

ENVIRONMENT AGENCY - DRAFT FUNCTIONAL STRATEGIES

RESPONSE BY THE INSTITUTION OF ENVIRONMENTAL SCIENCES

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As the various Strategies follow similar content structure and similar principles we feel that a common answer can be given to the 10 questions posed applying equally to all Strategies. Some independent comments on particular Strategies follow.

QUESTION

1. Is the overall message clear and concise? YES
2. Is the level of detail suitable? YES (one exception)
3. Does the strategy reflect the overall Agency vision and the principles set out in the draft Strategy for the Environment? YES
4. Does the strategy accurately reflect the functions contribution towards the goal of sustainable development? YES
5. Has the correct target audience been identified? YES
but add Trades Unions
6. Are the key issues, influences and pressures correct? NOT ENTIRELY
Add - EA should be involved in constructing legislation. (including at EC level).
EA should manage - others should be involved in operations.
7. Are the strategic aims, objectives and priorities relevant? YES
8. Are they practicable at local level? YES
9. Do the strategies form a sound basis for implementing the duties and responsibilities of the Agency? YES
10. Do they form a basis for measuring the success of the Agency's actions? YES

COMMENTS

1. **Generally**
 - (i) An element of self regulation may be necessary and organizations should therefore be encouraged to install Environmental Management Systems.
 - (ii) Provision of guidance notes on best practice should be made to different industry sectors.
 - (iii) Best practice should be drawn from external sources where appropriate - overseas included.
 - (iv) EA has an important function to perform in ensuring that issues are NOT tackled in piecemeal fashion (e.g. packaging regulations with insufficient incineration capacity).
 - (v) Consider buying-in laboratory services on a competitive basis rather than 'in-house'.
2. **Pollution Control** minimize and dispose of waste at source to be promoted: implement policy of "polluter pays" (there appears to be a considerable shortfall of income against expenditure).
3. **Waste Management** this strategy is repetitious and needs re-drafting - see also attachment.
4. **Conservation** low income should not inhibit necessary activity.
5. **Recreation** The negative effect of recreation is insufficiently emphasized -
the destructive impact of over-use for recreation must be recognized and controlled -
there must be a balance between sustainable use and control.
Levels of capital expenditure are low and not set to increase -
more funding, e.g. lottery, must be found to expand essential projects.
6. **Radioactive Substances** see attachment.

IES COMMENTS ON RADIO ACTIVE SUBSTANCES

- Should the document be confined to radioactive substance or should this also include ionising radiation? If the latter, then there should be close liaison with the body responsible for ionizing radiation.
- Greater emphasis should be given to:
 - not producing in the first place if this can be avoided.
 - segregation of waste and decaying in order to dispose of as less risk category.
- There should not be a rush to decommission. Apparatus and plant should be made safe and decommissioned when appropriate techniques are developed.
- The EA should be involved in developing new legislation not just implementing.
- "Customer" should include - patients, researchers, operators.
- Trade Unions should be included with "stakeholders".
- Contingency planning should be developed. One would see the EA perhaps managing this but with the operations to be carried out by the staff whose day to day work is with the handling and control of radioactive materials.
- There should be liaison with other regulatory bodies - particularly on health and safety and other ionizing regulations.

IES COMMENTS ON WASTE MANAGEMENT & REGULATION

- Consider litter as well as waste
- Clearly establish the hierarchy for waste prevention and disposal options.
- Think in terms of "conception to grave" "rather than cradle to grave".
- Encourage manufacture of long-life, easily maintained products. Provide incentives when considering disposal options, include incineration and the advantages and disadvantages. Many landfill problems could be overcome and better utilization made of the waste by use of this option.
- We should be considering the reduction of waste at source rather than recycling of a percentage of the waste produced. The target should then be a reduction of waste sent to final disposal (landfill) relative to 1997 figures.
- Encouraging home composting should remove ~20% of household waste that is currently sent as waste for disposal.
- Consider neutralization and compaction of waste before disposal.
- Consider waste exchange and clubs to remove some materials from the waste stream and to neutralize others without recourse to further manufacture and expense of materials used for neutralizing.
- Consider wider use of "season tickets" where waste from an established source is routinely transported and disposed.
- Advice and guidance to all in the chains is very important and should be given more prominence.
- Whilst appreciating that the EA have a regulatory role, it is very important that the EA are seen to be working with organizations and providing what help they can. If this should fail, it is then the heavy hand should be applied.
- Similarly, the provision and dissemination of information to the public at large should be of high priority. Inform the public in a programmed way so that the correct information is given first. It is very difficult to correct incorrect information published by others, once this has entered the public domain.
- Replace "cradle to grave" approach by "conception to grave" approach: more efficient processes and procedures lead to less waste. If waste is not produced in the first place, then there is not the problem of having to dispose of it.
- The EA must have an important role to play in developing and implementing regulation both in the EC and UK. There is also a very important liaison role to ensure that all views are considered to get regulations correct the first time.