

11/2/97

Comments on -

**ENVIRONMENT AGENCY CORPORATE PLAN 1998-99
OUR FORWARD LOOK TO 2000-01**

First a few general points -

- * I am disappointed with the document on the whole, there is a great deal of repetition and it appears that the document has been written by several different groups (not bad in itself) with poor editing.
- * Reading through the document raises the fundamental question - "is the balance of duties / function of the Environmental Agency (EA) correct ?"
Would it not be better for the EA to have regulatory responsibilities - for licensing, monitoring and regulation and Local Authorities (LA) to have operational responsibilities - for conservation and recreation? Air, and water, are no respecters of LA boundaries and LAs can not really be expected to have proper control over Air Quality in their areas particularly if the area contains motorways and trunk roads over which they have no control. Also LAs are struggling to get to grips with Air Quality measuring. The EA could, I'm sure, perform this function more efficiently, with greater flexibility and at lower cost if this was part of their remit.
Further, there appear to be blurred responsibilities for navigation that need to be clarified. Who has responsibilities for rivers, tidal rivers, canals ?
- * Throughout the text, there is reference to the EA having inadequate resources. Are the EA trying to take on too much themselves ?
Could they not for example get "industry" to carry out more monitoring themselves following a management system that has been agreed with the EA and for the EA then to monitor the system and carry out the occasional crosscheck? - eg p26
Could they also not get representatives of different sectors to write guidance notes which the EA would then just check for consistency ? The industries themselves have first-hand knowledge of what is happening in their own sectors - eg p28
Owners should be encouraged to carry out their own surveys on contaminated land and report these to the EA. This should certainly be done whenever any development is anticipated on a particular site.
- * Associated with lack of resources, the EA in this document appear to be making heavy weather of some of the operations, particularly those associated with radioactivity.
- * The examples of new duties listed in Figure 8.7 contain many duties which I would have thought were already part of the EA remit. It appears also that many of these could be combined rather than being taken in isolation with repetition of work.
- * One of the items that is repeated many times is "the polluter pays principle". I agree with this entirely but is it being followed through ? this should be extended to include the "user" and "waster" so that, for example, where water companies have leaks, they pay for the water that is wasted. The principle does not seem to be followed through in that we would expect each EA function to be self supporting. In all cases, the EA is receiving Government grants. If the polluter were really paying then grants would not be necessary. It would be much better for Government grants to be in the form of interest-free loans so that the EA could take on longer-term projects comfortably.
- * A number of activities are shown in Figures by numbering maps - eg Figs 1, 25, 26; In principle, this is a good idea. In practice, there is much repetition. It would have been

far better to separate the different EA functions and illustrate what they have achieved, or intend to achieve, on individual maps.

- * It is particularly disappointing to find no reference in Chapter 6 to the EA seeking third party audit of their operations and certification to an environmental standard such as ISO 14001.

Looking at specific items in the document -

- * p3 it is implied in the later text but not spelled out - "the EA should intend to work with industry to bring about improvement to our environment" then "to be a firm but fair regulator"
- * p5 Fig 1.1 - "8" this should include the provision of contingency plans to initially try to avoid and then alleviate the effects of any similar accident.
"27" - the issues should be investigated as widely as possible and not taken as T5 in isolation. I believe the EA is also considering the London wide plan. At least these two should be combined.
"28" - should EA have operational responsibilities or monitor the work of others ?
- * p6 - "Water resources" there should be some targets for reducing leaks.
- * p7 - "capital works for flood defence" - should be through interest free loans from Government and not subject to delays.
Should "charges for (polluting) discharges and water abstraction licences" not be increased further so that the polluter really is paying ? This will surely encourage improvement in practices.
- * p11 - Principal aim - 'In discharging achieving sustainable development and advising Ministers what is appropriate.
Welcome "integrated approach to environmental protection"
5th ■ under "Aims" - there should be additional aims -
 - * to reduce the amount of waste produced in the first instance - eg excess packaging, junk mail.
 - * to reduce the amount of litter produced.
- * p12 - Figure 2.1 - I find this quite confusing. Would it not be better to make reference to eight Regions and then to the Areas in these Regions - eg the three Areas in the Thames Region.
- * p13 - mention should be made of the overlap with the EEA and what they are doing to influence EC legislation at source rather than trying to catch up later.
- * p14 - I would like to see the strategy document.
The ■ points under "forward Strategy" should really be the hub of this document.
- * p15 - 2nd ■ - part of the overemphasis on radioactive / nuclear. There are many other forms of waste to be considered - again on p16
3rd ■ - is this really meant ? Surely this should read that air quality is not affected by discharges from major industries ?
"pressures" in centre of page should be identified and addressed - and p17
The 9 +s further down do not appear to have been addressed systematically.
The progress with LEAPs should be carefully assessed. Many overlap with LA plans already in place and, particular with the shortage of resources that has been referred to many times, repetition should be avoided.
- * p17 - care to avoid duplication of information with others. there is an information maze !

- * p18 - 6th ■ - current US stance on CO2 emissions !
exploit --> achieve - does not appear so devious !
- * p20 - should targets not refer to units of production ?
No mention made of CO. Should this not be reduced - perhaps at the expense of CO2
Quality of Land - How many contaminated sites ?
- * p21 - Further attempts should be made to limit waste at source
2nd ■ - limiting of imports of waste from EU countries. If there are no transport risks
and the necessary technology is available in GB for the safe destruction of the waste
should this not be the preferred route. The charges must reflect the investment in
technology that permits this.
Water quantity targets seem modest.
- * p23 - Aims 2nd ■ - should this not be in all cases ?
8th ■ - How ?
Performance Targets - 2nd ■ modest
- * p24 - What is meant by "quality of visit" - if quality improves, then quantity should
decrease. This is an area where EA could get the polluter to do more monitoring and, if
necessary, treatment.
When will DTA be implemented ? The path has been trodden by other Countries.
- * p25 - Figure 5.2 - improvements modest.
- * p26 - what does the first paragraph mean.
- * p27 - IPPC will replace IPC and will involve considerable more effort.
- * p28 - an example of where industry could be asked to do more and EA less.
- * p29 largely a repetition of p20
Producers should be able to give some indication of metal emissions from their mass
balances.
- * p30 - Targets for VOC emissions seem modest.
- * p32 - if Figures are not near to text then give page number. Figure 5.25 not particularly
relevant here anyway.
Last ■ - "average" exposure not a good target. There should be some target for those
living near to nuclear sites.
- * p33 - It seems unbelievable that a database library of authorisations has been
delayed. How are EA controlling ?
- * p36 - First aim with waste should be to reduce at source
It should be remembered that litter is part of waste. There should be some aim for this.
- * p37 - Imported wastes - can these be subdivided in to types ?
- * p38 - "move towards full cost recovery" - welcomed.
- * p39 - Figure 5.20 - Is it not the intention to reduce transfrontier shipments ?
- * p40 The numbers, sectors and locations of contaminated land sites should be
established.
All sites should be returned to a state that they can be used for any purpose. there
have been examples where uses have changed with effects that should have been
foreseen.
- * p41 - top of second column - surely the investigation of site remediation should be the
responsibility of the owner with EA performing a monitoring role. ?
- * p44 - 'nearly everyone' - who doesn't require an Agency licence ?
- * p48 - Flood defence - add "Visually attractive" to aim and objectives. EA is already
doing well

- * p53 - Who is paying the increased levies ?
- * p54 - Figure 5.39 - shouldn't causes not be established ?
- * p57 - Shouldn't management of recreation be for others ?
- * p59 - From where does "recreational income" come ?
- * p63 - Are canals included ?
- * p65 - Why have number of boats registered suffered a downward trend ?
Locks must be repaired. Get Government grant for long term and increase lock fees to pay for in the short term - the "user pays"
- * p66 - EA should go for a full, accredited environmental management system and then encourage others to follow. This will reduce the overall load.
- * p69 - Value for money - "The Agency actively aims to improve the quality of regulation to ensure the minimum burden with the maximum benefit to society" should be stated right up front.
- * p75 - Figure 8.3a - Why no income from contaminated land ?
- * p76 - Expenditure justification - I hope this is the responsibility of a budget holder with authority rather than being delayed by committee.

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