

Response written by
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5/02/99

Consultation on the Environmental Technology Best Practice Programme

The closing date for receipt of comments is **5 February 1999**. Please note that we reserve the right to make your responses publicly available unless you clearly ask us not to.

If you have any queries about submitting your response, please contact David Percival at the DTI, tel 0171 215 1056.

Are you familiar with the Environmental Technology Best Practice Programme or have you used its services in the past?

- yes
- no

Please indicate the nature of your organisation:

- Manufacturing industry or commerce
- Trade Association
- Environmental technology equipment supplier
- Consultant
- University
- Local Authority
- Other
- Professional Institute.

Consultation questions

1. Do you believe that a lack of reliable information hinders business from taking cost-effective steps to improve environmental performance?

- yes
- no

2. Is there a need for impartial information from a government source?

- yes
- no

3. Is there a role for a national Environmental Helpline?

- yes
- no

Please add any comments on the role for a national information programme, or how it should interface with locally-delivered services.

Business Links are the appropriate delivery mechanism for government advice to companies. Additional agencies degrade the 'one stop shop' concept. However, Business Links may need to access central advice on specialist issues, including environmental technology. ~~Now~~ Access to publications rather than a helpline may be sufficient in this respect.

4. Should any future programme continue to target similar issues as before or is there a case for the programme to shift its emphasis into other areas? Please rate the following priorities:

	Priority				
	High	Medium	Low		
The programme should continue to focus on the manufacturing process	5	4	3	2	1
The programme should address product design	5	4	3	2	1
The programme should cover broader cultural and economic issues	5	4	3	2	1
The programme should directly assist suppliers of environmental goods and services	5	4	3	2	1

Comments:

The programme is not able to change business culture as this depends on economic conditions. Support of specific suppliers is anti-competitive and may stifle efficiency and innovation. Manufacturing processes remain the main source of environmental hazards and so should still be targeted. Incentive design has the potential for far greater improvement of environmental performance across product life-cycles.

5. To what extent should the programme focus on helping companies meet environmental legislation at minimum cost, rather than promoting improvements which are cost-effective in their own right?

	<u>Priority</u>				
	High	Medium	Low		
The programme should focus on helping companies meet legislation at minimum cost	5	④	3	2	1
The programme should focus on promoting cost-effective improvements	5	④	3	2	1

Comments:

The programme should aim to improve the standard of Best Available Techniques Not Entailing Excessive Cost, Best Practicable Environmental Option and Best Practicable Means. This means promoting cost-effective technology that yields higher environmental standards and thus moves the legislative benchmark of acceptable practice up a notch.

6. Should the programme aim at stimulating short-term incremental improvements or should it promote step-change improvements? If it were to take the latter approach, would it be necessary to have a greater emphasis on R&D?

	<u>Priority</u>				
	High	Medium	Low		
The programme should aim at stimulating short-term incremental changes	5	4	3	2	①
The programme should focus on promoting step-change improvements	⑤	4	3	2	1
The programme should place emphasis on R&D	⑤	4	3	2	1

Comments:

It is extremely difficult for a programme with a relatively small budget to achieve significant incremental change across the business community against the prevailing economic climate. The programme's resources will be far better used in developing and promoting step change improvements.

7. Should the programme be largely targeted at specific sectors or should it do more of a cross-sectoral nature?

	<u>Priority</u>			
	High	Medium	Low	
The programme should be targeted at specific sectors (5)	4	3	2	1
The programme should be aimed at cross-sectoral issues	5	4	3	2 (1)

Comments:

<p>Environmental damage is mainly caused by a small number of sectors who can be targeted effectively by the programme. Cross-sectoral issues such as building and transport efficiencies will respond little to an information programme. Higher legal standards on product design are required to achieve the latter effects.</p>

8. If you believe the programme should target specific areas, what criteria should be used to determine priorities?

	<u>Priority</u>				
	High	Medium	Low		
- environmental impact of waste and emissions	(5)	4	3	2	1
- consumption of resources in relation to sustainability of supplies	(5)	4	3	2	1
- cost saving opportunities for business	5	4	(3)	2	1
- number of businesses in the sector	5	4	3	(2)	1
- potential for uptake of measures by other companies	5	(4)	3	2	1
- commercial opportunities from solution both in UK and overseas	5	4	(3)	2	1

Comments:

Action purely to save costs and produce products with commercial opportunities are better facilitated by the market place.
 It is the role of Government to facilitate those changes that the market can not deliver, in this case the protection of the environment.
 The number of businesses involved may have little bearing on the scale of the environmental impact.

9. Assuming that any continuing programme continues to have similar objectives to the current one, are the existing mechanisms for information transfer the most effective, or should others be developed?

	Useful				Not useful	
- a telephone helpline	5	4	3	②	1	
- half day free on-site consultancy	5	④	3	2	1	
- benchmarking guides	5	④	3	2	1	
- guides describing good practice on specific issues	5	④	3	2	1	
- guidance on environmental priorities	5	4	③	2	1	
- case studies	5	④	3	2	1	
- electronic communication tools:						
internet	5	④	3	2	1	
CD ROMs	5	4	③	2	1	
management software	5	4	③	2	1	
- waste minimisation clubs	5	4	③	2	1	
- events (seminars, workshops, visits)	5	4	3	②	1	
- direct marketing techniques, articles in press etc.	5	4	③	2	1	

Others would be useful as follows:

The use of collaboration with other agencies e.g.
 The Environment Agency could effectively market the service to target sectors.
 Business Links could effectively deliver the service.

10. If the programme priorities should be altered, in what way should the promotional mechanisms change?

See above.

11. What role should the programme play in relation to wider policy initiatives? Should the programme play a role in supporting:

- | | | |
|------------------------------------|--------------------------------------|--------------------------|
| sectoral sustainability strategies | <input checked="" type="radio"/> yes | <input type="radio"/> no |
| voluntary agreements | <input checked="" type="radio"/> yes | <input type="radio"/> no |
| company environmental reporting | <input checked="" type="radio"/> yes | <input type="radio"/> no |
| environmental management systems | <input checked="" type="radio"/> yes | <input type="radio"/> no |

Comments:

To improve effectiveness, the programme should support other initiatives where possible. However, the most important initiative is the legislative programme operated by the Environment Agency and support of this should be the priority.

12. Assuming that the future programme continues to be principally an information and best practice dissemination programme, how can impact best be measured? Please rank the following in order of priority:

- surveys of programme users 4
- surveys across business as a whole 2
- surveys to benchmark environmental performance 1
- monitoring of take-up of programme outputs 3

Please add any further comments:

Benchmarking studies are vital to any performance measuring. The progress of businesses in ~~length~~ as a whole in targeted sectors can then be measured, as long with the proportion of progress attributable to the programme. It is all too easy to manufacture indicators of success to support a worthy ideal, but if the programme is not producing real environmental benefits it should be dropped in favour of something more effective.