

26.02.09

Consultation on England and Wales Pollution Inventory 2009 to 2011

EEF, the manufacturers' organisation, has a membership of 6,000 manufacturing, engineering and technology-based businesses and represents the interests of manufacturing at all levels of government. Also comprising Engineering Construction Industries Association (ECIA) and UK Steel, EEF is a leading provider of business services in employment relations and employment law, health, safety and environment, manufacturing performance, and education and skills.

EEF is fully engaged on the issue of resource efficiency and have just produced a major piece of research into the drivers and barriers and potential solutions for resource efficiency in UK manufacturing. The report "business benefits of sustainable resource management" identifies and analyses the positive effects of resource efficiency in UK manufacturing and outlines major benefits and opportunities. It promotes a greater understanding of sustainable manufacturing offering a handbook of practical solutions applicable for a wide range of factory environments.

Our response to the specific questions put forward in the consultation is provided below.

Question 1: Do you agree with the substances that we are proposing to remove from the Pollution Inventory? If not, why not?

Reflecting the Government's 'Regulator's Compliance Code', EEF advocates a risk-based, proportionate and targeted approach to regulation. We, therefore, support the Environment Agency's (EA's) decision to remove 30 Volatile Organic Compounds (VOCs) from the Pollution Inventory substance list on the grounds that further data requirements for these substances, based on the low quantities and few sites which report them, would be an unnecessary burden.

Questions 2: Do you agree with the addition of the 8 substances to the Pollution Inventory? If not, why not?

There is concern that chlorine present in significant discharges of drinking water could exceed the reporting threshold of 0.1kg. A result of this action would be that installations that use large quantities of drinking water could exceed the threshold and, thus, be required to monitor their discharges for no significant environmental benefit. We would ask the EA to reconsider the practical implications of this threshold value.

Question 3: Do you have any suggestions to improve READ metrics, or alternative ideas to measure resource efficiency in EPR regulated industry?

READ is an appropriate tool for sites to measure and to improve their resource efficiency, and should be used in direct engagement with EA site inspectors. However, the decision to publish results of the READ scores and to benchmark performance within sectors for each Pollution Prevention and Control (PPC) site should be resisted. For example, the steel sector produces a vast range of products, which are manufactured through a number of differing process routes; developing a generic sector performance profile would, therefore, not be effective or representative. We are concerned that the publication of READ scores could lead to some misleading and unfair assumptions being drawn about the sector unless an appropriate level of explanation was provided as evidence. This activity would require additional resource and industry expertise.

Equally, the use of aggregated scores or indices for reporting purposes does not necessarily suit all sectors. The steel sector is dominated by one major company and any results would ultimately depend on their performance.

It is important that the anticipated benefits of the READ initiative (£3m-£16m per annum) are justified, and the methodology explained, in any future review.

Question 4: Would you like the READ tool to support non-EPR (Environmental Permitting Regulations) A1 installations, e.g. by helping them to give data voluntarily to their trade association or to national database and receive feedback?

We would advise that the READ tool only be extended to EPR A1 installations in the first instance. Only when the tool has been appropriately tested and proved suitably robust should any extension to its scope be considered. However, we would question whether the submission of voluntary data would provide an accurate indicator of industry action.

The recommendation that trade associations may act as a data agent for the EA has not been thought through. This proposal places increased demand on a trade association's limited resources and is unlikely to win widespread support. EEF does not support this recommendation.