

Date: February 2009

**The Environment Agency consultation on England and Wales Pollution
Inventory 2009 to 2011**

Water UK welcomes the opportunity to comment on the Environment Agency's consultation on England and Wales Pollution Inventory 2009 to 2011.

Water UK represents the water and waste water service providers at UK and European level. Our members contribute to protection and enhancement of the environment and public health. We support the principles of sustainability, better streamline and efficient regulation.

In our response to the consultation we have provided some general comments and answered the specific questions that are of particular relevance to our industry.

General Comments

We note that READ data will be provided by EPR A1 operators and the proposal is that, with the exception of three named sectors and sites regulated under RSA, the Pollution Inventory will be used to collect this data which relates to sustainable consumption and production. Where this data is already provided under current permit requirements, the latter requirements will be withdrawn.

Further, the Agency is considering making the READ tool available to other facilities.

Whilst we support the principles of sustainability, measurement of performance, consistency of reporting and efficiency of data collation, the proposal raises serious concerns when applied to our industry in that we believe it could result in inaccurate and inappropriate reporting.

We would propose that the water sector is treated in the same way as the landfill sector (for similar reasons) and that READ data for our EPR A1 installations is not required to be provided to the Pollution Inventory.

Date: February 2009

Owing to the difficulties of separating out releases and transfers for the different parts of a site (and between sites) and to reduce the risk of double counting, emission data from our EPR A1 installations is included currently in the Pollution Inventory return for the whole sewage treatment works (STW) site. However, additional reporting regimes exist and we believe that there remains a risk of double or triple counting on the Pollution Inventory the volumes of waste we treat, landfill and incinerate or recover. The same difficulties would apply in respect of READ data.

The water industry has developed sustainability indicators and publishes annually a comprehensive document, "Sustainable Water" which includes data and information on water, energy and raw material usage and waste generated. This data is accurate, appropriate and consistent across the sector. A copy of the latest report is available from the Water UK website using the link below. We have initiated discussions with other members of the EA on how to use the information in the report to work towards a sustainable water sector. We would be pleased to discuss the details with Pollution Inventory Team.

Reporting Regimes

Multiple reporting regimes can lead to multiple reporting of the same material. Within the water industry we hold a small number of Part A(1) EPR permits in respect of certain sludge treatment processes. The boundary of the Part A(1) installation will occupy a small part of and be located wholly within the boundary of the sewage treatment works site. Reporting requirements are specified in the permit. The STW site may also be subject to other waste controls (exemption and/or licence containing reporting requirements) and be used for import and export of sludges from other STW sites prior to final recovery or disposal of the sludge from or at yet another site.

It is perfectly feasible, therefore, that the same sludge might be reported several times as it is treated on one site, imported and exported at another site and then incinerated or recycled at the final treatment centre.

In essence, in respect of STW:

- the whole site is not Part A(1) permitted

Date: February 2009

- a Pollution Inventory return will be made for the whole site (including the Part A(1) installation) if it is captured under the reporting criteria listed in the Ministerial Direction, 2004
- the site does not "manufacture" or have a commercial output. It treats sewage and sludge and a single portion of sludge will be treated on a number of different sites under different permit
- the other permits and regulations carry reporting requirements which are not mutually exclusive. These various returns may appear on the Pollution Inventory and be construed as new waste when, in reality, it is the same material

Specific Comments

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

Yes, we understand and agree with the reasons given and express our support for the proposal.

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

Yes, we accept the need to gather information on potential Specific Pollutants in order to inform River Basin Management Plans. However, we repeat the concerns that we have expressed in previous consultation responses that data provided to the Pollution Inventory in respect of emissions from sewage treatment works is largely estimated. The large flows discharged from STW combined with estimated concentrations can result in emissions being over-stated and this information, therefore, should be treated cautiously.

Question 3: Do you have any suggestions to improve the READ (Resource Efficiency Appraisal and Development) metrics, or alternative ideas to measure resource efficiency in EPR regulated industry?

Date: February 2009

We do not believe that READ data for our EPR A1 installations should be provided to the Pollution Inventory.

The water industry publishes comprehensive information annually on progress towards a sustainable water sector.

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 a national database and receive feedback?

Our support for the principle of each sector developing sustainability indicators is illustrated by the water industry publishing annually a comprehensive document, “Sustainable Water” which includes data and information on water, energy and raw material usage and waste generated by the sector.