



FROM THE EXECUTIVE DIRECTOR

TEL 020 7591 3200

e-mail: j-hayler@esauk.org

07 July 2020

Emma Howard Boyd
Chair
Environment Agency
By email

Dear Emma,

ESA has been pleased to see your recent comments on the need to build back better and the importance of investment in low-carbon infrastructure as we recover from the coronavirus crisis.

As you of course know, the recycling and waste industry could play an important role as part of a green recovery by delivering new recycling and recovery facilities which create jobs and boost local economies, whilst at the same time saving carbon emissions as we move towards a more circular economy.

ESA's Members are keen to play our part and make a full contribution to the recovery. We are however deeply concerned that our efforts will be frustrated during the next critical 6-18 month period by a lack of permitting capacity at the Environment Agency. As you know from our letter of 22nd May to Sir James Bevan, this is a serious and ongoing concern for the industry which predates coronavirus and is holding up 100's of £millions of investment into vital waste and resource management infrastructure. We are also aware from discussions with other sectors that this is clearly not an issue which affects only the waste and resources sector.

There is currently an average waiting time of five months for applications and variations even to be assigned to an officer for processing and dozens of recycling projects are being held up by permitting delays at significant cost to operators. Whilst we recognise that C19 will have had some impact on EA working patterns, the numbers of EA permitting staff – and associated permitting fees - have not reduced since the start of the pandemic, so in our view provide little mitigation for these long delays.

Whilst recent discussions with your National Permitting Service leads have been informative, they unfortunately have not given us any confidence that permitting service levels will improve in the short to medium term.

I would stress again, that whilst C19 has certainly exacerbated this issue, permitting delays have been steadily worsening over the last few years. In our view fundamental change is needed to the

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permitting system to bring about much needed change for such a business-critical aspect of the Environment Agency's remit.

We would welcome your support in ensuring that the recycling and waste industry is able to realise a full contribution towards a green recovery.

I look forward to your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Hayler', with a stylized flourish at the end.

Jacob Hayler

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