

Environmental Permitting Programme: Developing the Standard Permit

21 June 2007

Founders' Hall, London

Background to Environmental Permitting Programme

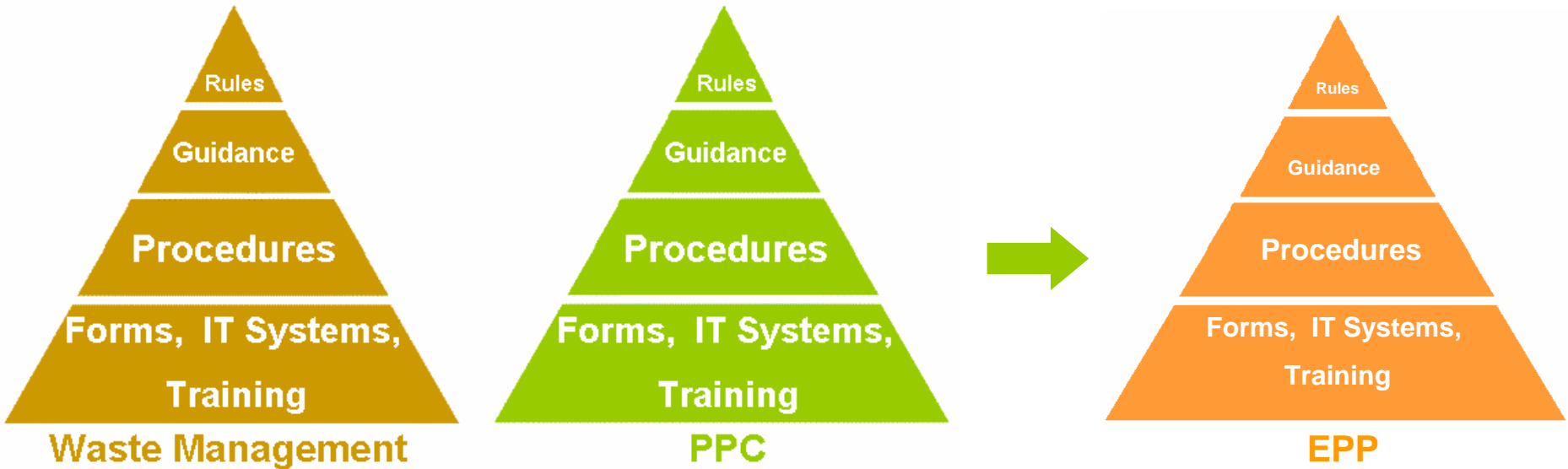
Sara Spillett

Joint Defra / Environment Agency / WAG EPP Team

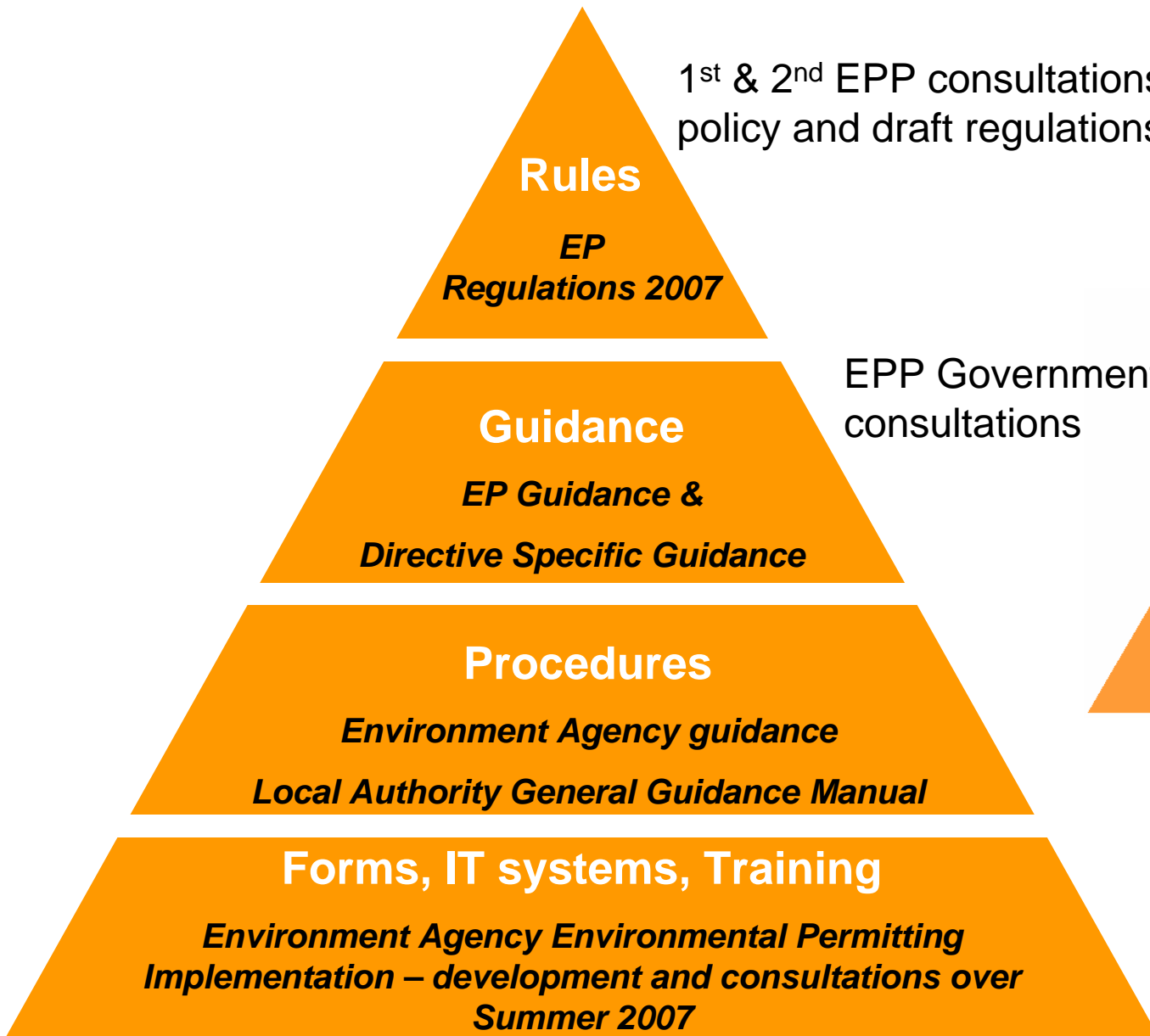
www.defra.gov.uk/environment/epp

epp@defra.gsi.gov.uk

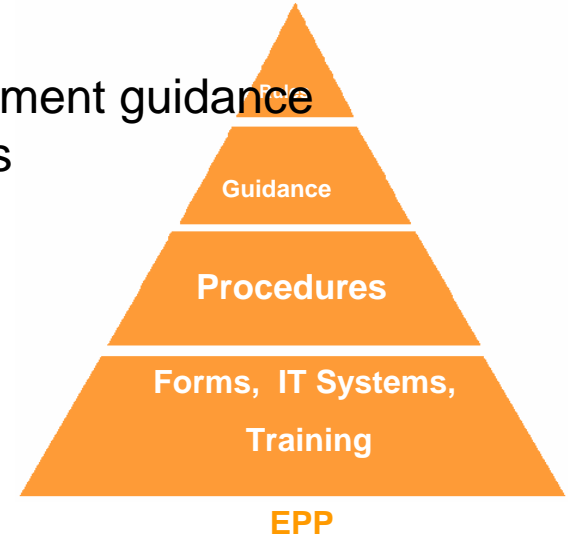
Environmental Permitting Programme Background



1st & 2nd EPP consultations on policy and draft regulations



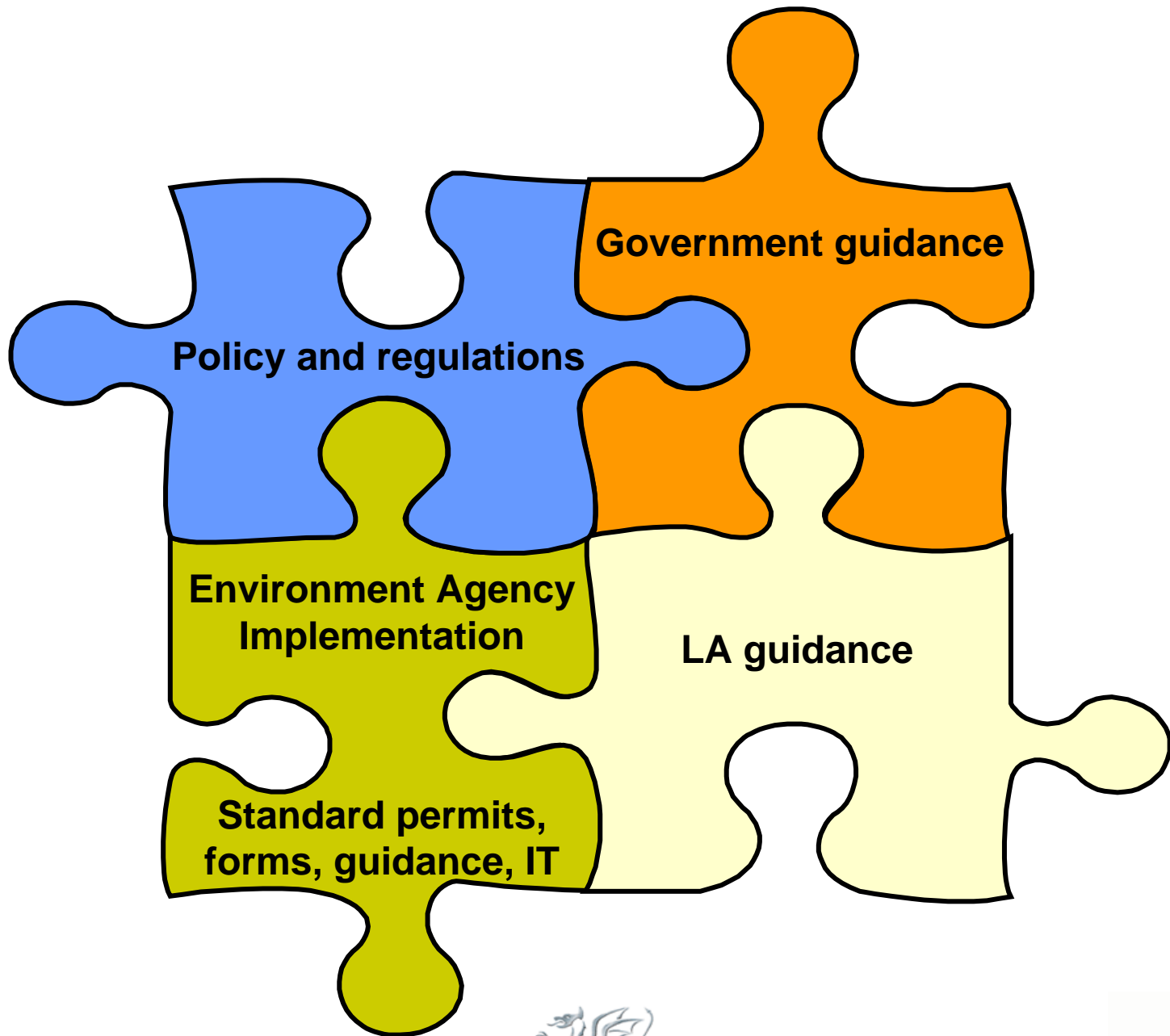
EPP Government guidance consultations



**Environmental
Permitting Guidance**
Directive Specific Guidance

EA Guidance





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Environment Agency Implementation

Crystal Moore
Project Manager



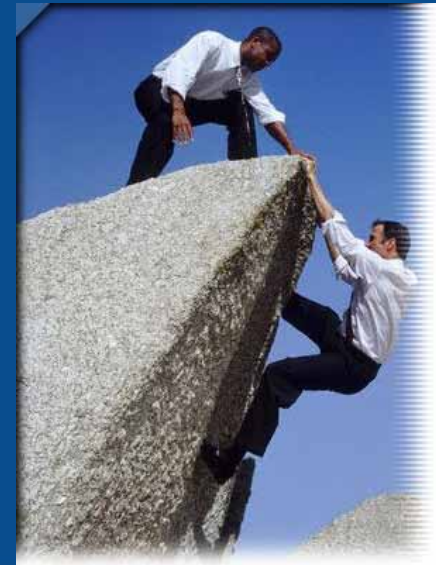
The journey so far.....

- Evolution of internal initiative & DEFRA reviews
- Planning
- Organising
- Scoping
- Refining
- Formal 'Project' set up in April '07

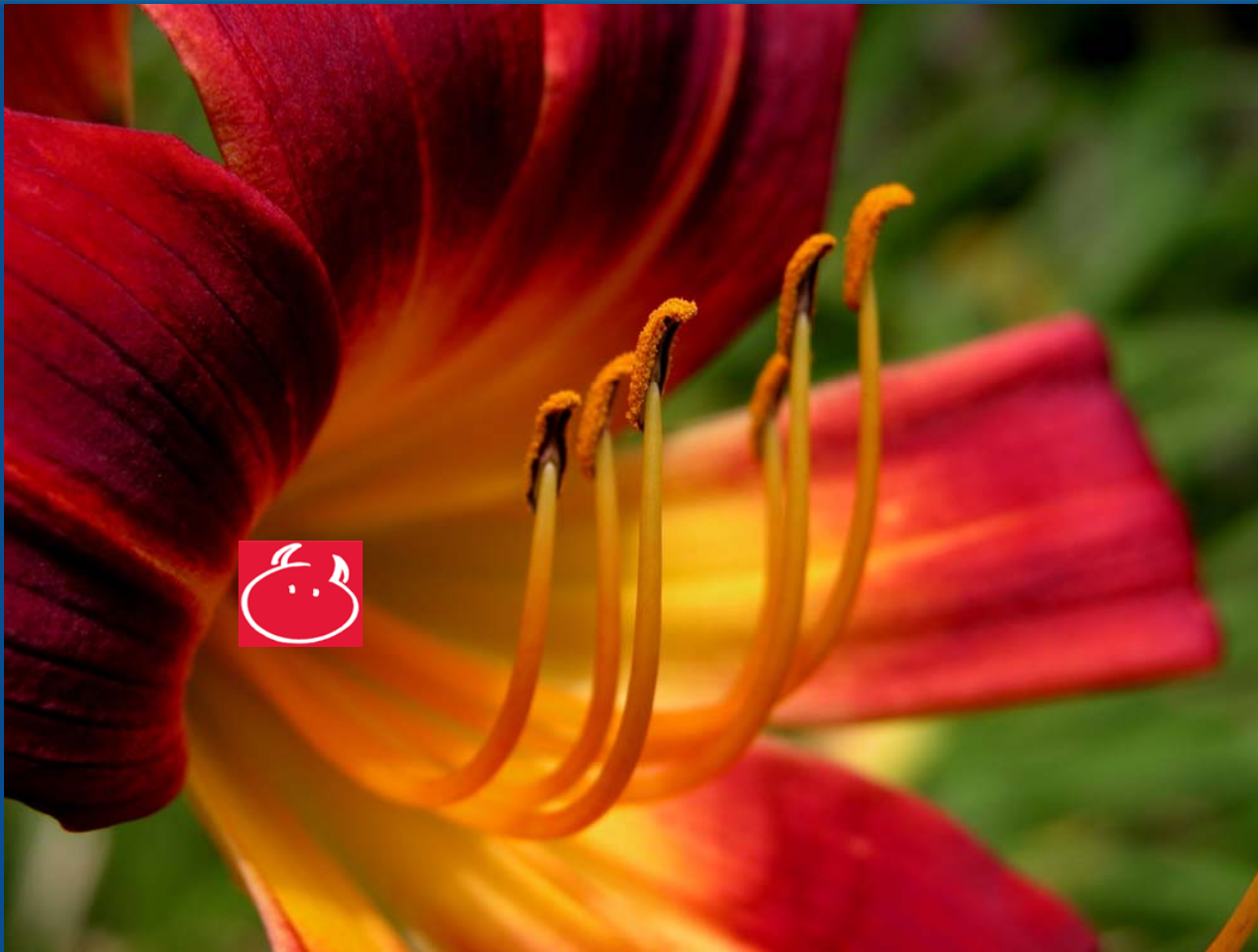
Scale of the task.....

- Harmonises many documents (~600, ~8,000 pages)
- Streamlines, clarifies and simplifies
- Sharpens customer focus
- Regulation proportionate to risk
- ~65 licences currently being road-tested
- **Have we missed any?**

....for April '08



Feedback to date



Implementation constraints

- Baseline conditions tested at appeal (PPC)
- Case law
- Cost/benefit

- Technical standards do not change
- Transitional arrangements

External Consultation Timeline

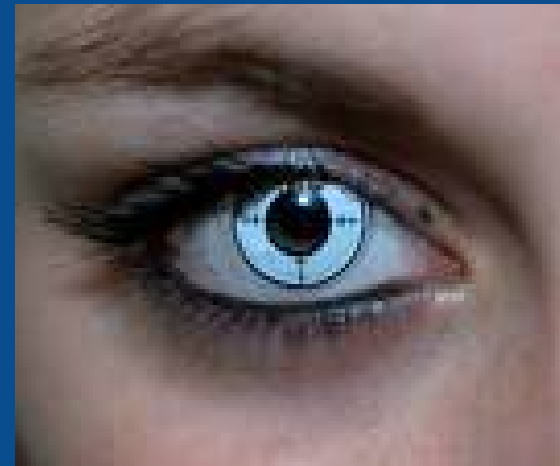
	A	M	J	J	A	S	O	N	D	J
Public Participation Statement	Consult									Publish
Standard Permits					Consult					
Generic Documents					Roadtest					
Sectorial Documents					Roadtest?					
Forms					Consult					

How do you want us to communicate?



What does success look like?

- You provide us with good quality input
- We get the detail right...first time
- Environmental standards maintained
- Consistent, risk-based approach delivered
- Documents clearer, simpler & less of them





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Standard Permits

Bob Barker

Mod Reg Technical Manager

What I Will Cover

- Common system and approach
- Standard Permits
 - What are they
 - How developed
 - Use
- What we would like you to consider today
- Breakout groups

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Modern Regulation

The Risk Spectrum

3 Tiers of Permits

Compliance effort

Permitting effort



Registrations

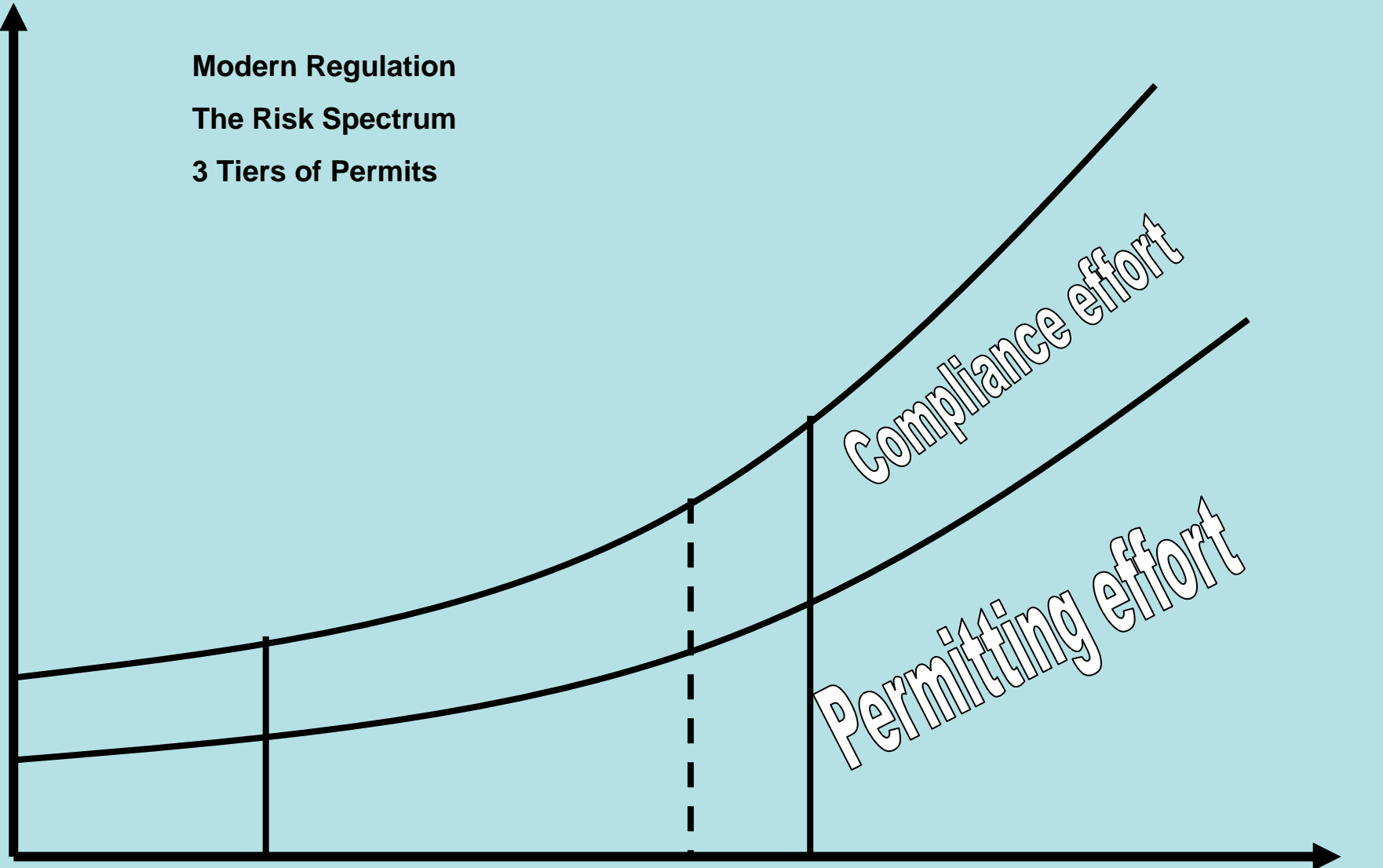


Standard Permits



Bespoke Permits

Environmental Risk



Changing the way we think

- Less time on low risk permitting- more time where we can make a difference
- Expect operators to comply-enforce if they do not
- Accepting of high level risk assessments in legislation and guidance
- Compliance

Standard Permits

- Suitable for an activity:
 - Low to Medium risk
 - Location independent
 - A reasonable number
 - Can develop a common set of conditions
 - Can define an envelope
- Implement a set of standard rules

Standard Permits

- Focus on Risk Based Environmental outcomes
- Less Restrictive
- Know what you are getting
- Pre consultation on conditions
- No site specific risk assessment
- Potential quick issue
- Cheaper than bespoke - fee and app. prep
- Reduced information/forms
- **Environmental standards will not be compromised.**



Standard Permit Development

- Work with organisations to develop consultation draft
 - e.g. Industry
 - Conservation bodies
 - LACORS
- Consult on the draft
- Finalise
- Publish
- Advertise

Changing the rules

- Develop consultation draft
- Consult
- Finalise and publish
- Opportunity for operators to move to bespoke
- Implement

Types of Standard Permits Planned

- Review and convert existing Fixed Licences into Standard permit eg:
 - Household, Commercial and industrial waste transfer station: variants for treatment and asbestos storage
 - Asbestos transfer station
 - Inert waste and excavation waste transfer station variant for treatment
 - Civic Amenity site: hazardous and non-hazardous
 - Composting: variants for windrows for green waste and manure, or in-vessel
- Mobile plant for treatment of waste soils.
- Any others of sufficient volume?

Consideration for today

- Breakpoints between Standard and Bespoke/Building
- Risk assessments/rules
- Application form
- Guidance on conditions

Breakpoint between Standard/Bespoke/Building

- Several breakpoints within FCL. Not needed for EPP permitting, might be for compliance
- Typically max 75000te/an unless less other reasons
- Typically Transfer stations no building less than 5000te/an
- What do you think are the right maximum and why?
- Are there natural technology breakpoint considerations?
- Are there natural commercial size considerations-now/future?
- Need clear standards and definitions.
- Most interest to Transfer activity?

Risk Assessment/Rules

- Process is one of expert judgement against headings
- Rules (controls) reduce risk to acceptable level eg:
 - Impermeable pavement with sealed drainage
 - distance from from European site/housing
 - no point source emissions
- You have a range of examples
- Is the process right?
- Are the common rules appropriate?
- Are the activity specific rules appropriate?
- Most interest to non transfer activities?

Application Form

- Significantly reduced
- Policy under development
- Technical competency
- Relevant conviction
- Financial provision
- Is the information asked for sufficient/too much?
- Is the commitment by the operator clear?
- Some overlap with Risk group

Guidance

- Outcome focused Rules
- Direction of compliance
- Is guidance sufficient?
- Management guidance -is level right/too little
- Small operator needs
- Medium/Large operator needs
- Public needs
- Amenity type rules (odour/noise etc)



Breakout sessions

- Choose your group
- Leader
- Chose person to feedback
- Your chance to influence
- We need your knowledge
- Feedback



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