

26 February 2009

Simon Bingham
Environment Agency
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Westbury-on-Trym
Bristol
BS10 6BF

Dear Mr Bingham

Consultation on England and Wales Pollution Inventory 2009 - 2011

I am pleased to enclose a copy of FDF's response to the specific questions set out in the above Consultation (attached as Annex 1). This primarily focuses on issues around the introduction of Resource Efficiency Appraisal and Development (READ) metrics and associated data requirements.

Further to the Food and Drink Manufacturing READ workshop held on 13 January FDF would also like to take the opportunity to make the following additional points concerning the EA's plans around the interpretation and publication of READ data:

- The need to exercise caution when assessing priority sites for improvement based on REPI data especially when this is based on absolute resource usage as opposed to efficiency; there is also the need to carefully consider the language used when presenting such information;
- The draft FAQ document circulated in conjunction with the workshop makes clear that the EA intends to publish an annual report on its website with annotated graphs showing sector performance profiles for key REPI data from 2010. We also understand that a companion spreadsheet will be published containing all of the REPI data which would enable individual site data to be identified. Aside from the issues around data based on absolute consumption mentioned above, there is naturally some anxiety within the industry about the EA effectively publishing league tables of companies and sites given the potential for misinterpretation and manipulation of this information by third parties. For this reason we would like to see the implementation of READ given more time to 'bed in' and to allow confidence in the tool to grow before these public disclosure aspects are considered further with operators.
- The EA has provisionally proposed using ten Optimal Sector Classifications (OSC) to maximise the value of comparisons. FDF considers that further fine tuning of these groups should be considered to provide more valid comparisons. For example under the groups currently proposed a breakfast cereal manufacturer and a vegetable canner would both fall under the same classification as both are processes which involve treating raw vegetable-based foods. However, each could be expected to have quite different resource use profiles because of the quite different processes involved.

We would ask that these points be given further consideration by the EA in taking the READ project forward along with the specific points in response to the consultation questions attached.

Please do not hesitate to contact me if any points require clarification or elaboration.

Yours sincerely

A handwritten signature in cursive script that reads "D. Bellamy".

David Bellamy
Sustainability Manager

EA Consultation on England and Wales Pollution Inventory 2009 to 2011: FDF response to the consultation questions

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

FDF has no comments to make here.

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

FDF has no comments to make here.

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

Raw Materials Use

Footnote 7 suggests that all fuel and water is excluded from Section 2, Raw Materials Use. However the Q&A circulated in conjunction with the food and drink sector workshop on 13 January makes a further clarification that water which forms an integral part of the raw materials as they are received by the installation should be included whereas water which is combined into the product within the installation should be included under Section 4, Water Use. FDF would suggest that these additional clarifications be included as footnotes to the relevant metrics.

With respect to gross total raw materials consumption, footnote 8 allows for “scaling up” calculations to be used to determine total raw material use where this would otherwise be burdensome (e.g. in cases where there is a large inventory of raw materials). FDF supports including this option for operators. However there may be benefit in the EA developing some guidance as to how scaling up should be done in practice, perhaps illustrated with a few examples.

Energy Use

The Q&A states that CHP fuel use is accounted for under both Section 3(a), Gross Total Energy Use and Section 3(b), Net Electricity use and possibly other fuel metrics to ensure any efficiency savings/energy exports are not lost. FDF fully supports this approach as consistent with current practice under the Climate Change Agreements (CCAs). Regarding the issue raised in the Q&A about the option of adding an additional metric for surplus heat FDF considers that this would be desirable and would be consistent with practice under the CCAs.

Water Use

FDF notes that the draft Q&A circulated in conjunction with the food and drink workshop in January indicates that the EA is now minded to include through flow cooling water under Section 4 because of the connection with energy consumption, although is open to further discussion on the matter. FDF consider that there was some logic underpinning the EA’s

previous proposal to exclude cooling water which is returned to source. This logic is reflected in the Federation House Commitment, a water reduction initiative launched last year by FDF and Envirowise as part of the FDF Five fold Environmental Ambition. FDF would therefore welcome the opportunity to discuss this issue further with the EA, including the reasons behind the change of position, before any final decisions are taken.

As per our comments under 'Raw Materials Use' above we would recommend that a footnote be added clarifying what should be included under this section.

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

FDF agrees that READ has potential to help companies which the EA does not directly regulate. However we would like to suggest that this option be explored once more experience has been gained from working with EPR A1 installations and any teething issues have been resolved.