

→ GR A type attached letter  
CONFIDENTIAL bc DP.

CONFIDENTIAL

No. 4-  
of the Royal Society -  
the other way I set  
went to Professor Johnson  
primarily of the (Cabinet Office)  
who had some notes  
which were in  
with him.

PRIME MINISTER

Before Christmas the Policy Unit put a note to you arguing that the Government's case on environmental pollution was not being adequately presented. In response to this, I commissioned a note from Sir Robert Armstrong on how the machinery of Government has worked in this area, and how it might be strengthened. He has reported - see attached - that the handling of pollution issues has been deficient. He endorses the suggestion for an additional sub-committee of E, with a meeting of Ministers to be held to set the scene for this. Mr. Gregson is conducting a stock-taking of the policy framework and the issues likely to come up during the course of the year. This will take a few weeks to complete.

Policy Unit are naturally anxious to make progress, and prefer to hold the introductory meeting of Ministers as soon as possible, using their note as the basis of the discussion.

✓ We are faced with a choice of an early meeting to give impetus to work in this area, or a later meeting which could be better documented, and could draw on the Gregson exercise. My own view is that a better focussed meeting somewhat later would be preferable.

An alternative which may combine the best of both approaches would be for a letter to go to Mr. Jenkin, expressing your concern and urging full cooperation with the Cabinet Office exercise. This would achieve the effect of galvanising the Department of the Environment, and also would strengthen Mr. Gregson's hand in completing his exercise. You could also send Mr. Jenkin a copy of the Policy Unit note on a personal basis. (It has already been discussed with Mr. Waldegrave who is known to be sympathetic.)

Agree I write along the lines of the attached?

AT

Yes - but let

them get a little

further with the Rules Bill

just not

18 January, 1984.

CONFIDENTIAL

D10

NBPM

AT  
13/2



SECRETARY OF STATE FOR ENERGY  
THAMES HOUSE SOUTH  
MILLBANK LONDON SW1P 4QJ  
01 211 6402

Andrew Turnbull Esq  
Private Secretary to  
the Prime Minister  
10 Downing Street  
London SW1

10 February 1984

*Dear Sir*

ENVIRONMENTAL POLLUTION

*file with FEHB*  
My Secretary of State has seen your letter of 24 January, and shares the Prime Minister's concern on the Government's public stance on environmental issues. He therefore welcomes the initiative and agrees that ministerial discussion would be timely in an area of growing national and international importance.

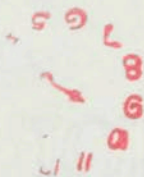
I am copying this letter to the other recipients of yours.

*Yours sincerely  
Michael R.*

M F REIDY  
Private Secretary

Env. Affairs : Env. Pollution

Sept '79



11 FEB 1984



CONFIDENTIAL

CC NO

Ant Prime Minister ②

Mr Jenkins has accepted the case to give EP issues greater prominence.

2 MARSHAM STREET  
LONDON SW1P 3EB  
01-212 3434

AT 31/1

My ref:  
Your ref:

Dear Andrew

31 January 1984

ENVIRONMENTAL POLLUTION

Thank you for your letter of 24 January. My Secretary of State looks forward to a discussion with the Prime Minister in due course.

She may wish to know that her concern was anticipated last autumn when my Secretary of State, on a proposal from Mr Waldegrave, set in hand work to review our overall policy and presentation on environmental issues, both in the UK and in the EC. This work will form the basis of our paper for EP.

As your letter recognises, it is sometimes difficult to reconcile a responsible environmental policy with the increasingly emotional demands of some pressure groups; in the particular case of lead in petrol, however, the Government's response to the Royal Commission's report was immediate and, on the whole, very well received.

Our paper for EP will be submitted as soon as possible.

I am copying this letter to the recipients of yours.

Yours sincerely

L. Robinson

LUCY ROBINSON  
Private Secretary

Andrew Turnbull Esq

Env. Affairs

Royal Commission

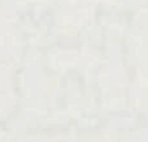
Education

Jan 29

31 JAN 1984



CONDOR



NBPM  
AT 31/1

Foreign and Commonwealth Office

London SW1A 2AH

CDP

31 January, 1984

Dear Andrew,

Environmental Pollution

Sir Geoffrey Howe has seen a copy of your letter of 24 January to John Ballard.

Sir Geoffrey welcomes the Prime Minister's initiative in this field. He has commented that environmental issues were identified as an important part of the Government's election manifesto, and have been reflected in our EC new policies proposals. He entirely agrees that it is right for us to be seen to be keeping the initiative on all these topics, and looks forward to taking part in Ministerial discussions on the subject.

I am copying this letter to recipients of yours.

Yours ever,

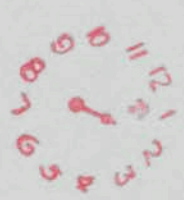
Peter Ricketts

(P F Ricketts)  
Private Secretary

Andrew Turnbull Esq  
10 Downing Street

ENVIRONMENTAL AFFAIRS & Effects of acid rain: Sept 79

ENVIRONMENTAL AFFAIRS  
1111 1111 1111 1111



31 JAN 1980



10 DOWNING STREET

FCO FM  
CDP  
cc MOD  
SO

From the Private Secretary

24 January, 1984

Dear John

ENVIRONMENTAL POLLUTION

The Prime Minister has become increasingly concerned in recent months that the Government's public stance on environmental pollution matters both nationally and internationally often appears defensive and reactive. The Government is properly concerned to evaluate the scientific evidence and to balance environmental and other considerations responsibly, but it is easy for pressure groups both at home and abroad to make the running. Where positive policy changes have been made, for example relating to lead in petrol, the Government has not always received full credit.

The Prime Minister understands that the Official Committee on Environmental Protection (EP) is about to take stock of the issues likely to come up during 1984 to identify potential issues of difficulty so that policy options can be exposed in good time before the Government has to take up a public position. She has instructed the Secretary of the Cabinet to ensure that EP completes this report as quickly as possible. As soon as it is available she has it in mind to have a meeting with your Secretary of State and the other Ministers mainly concerned to review the Government's overall policy on environmental pollution and the scope for improving its presentation.

I am sending copies of this letter to Janet Lewis-Jones (Lord President's Office), Brian Fall, (FCO), Michael Reidy (Department of Energy), Callum McCarthy (Department of Trade and Industry), David Normington (Department of Employment), Dinah Nichols (Department of Transport), Ivor Llewelyn (MAFF), John Gieve (HM Treasury) and Richard Hatfield (Cabinet Office).

Yours sincerely  
Andrew Turnbull

(Andrew Turnbull)

J. Ballard, Esq.,  
Department of the Environment

JC



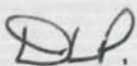
MR TURNBULL17 January 1984INDUSTRIAL POLLUTION

Sir Robert Armstrong's minute confirms that the handling of questions of environmental pollution has been inadequate. The official committee machinery has hardly been used and there is no Ministerial committee specifically charged with these issues.

Our earlier minute to the Prime Minister stressed the serious policy and political difficulties which we are encountering in this area. We are concerned that Sir Robert's proposals to await an interdepartmental review at official level will further delay consideration of this problem by Ministers.

We recommend that an early meeting of Ministers chaired by the Prime Minister is required to raise the profile of the whole issue. We are rapidly losing public confidence in this sensitive area and we must take steps to regain the initiative.

Our earlier paper could be a suitable basis for this discussion as the issues are presented more starkly than is likely from an interdepartmental review. The meeting could also discuss whether a Sub-Committee of E is required. More detailed changes in the official machinery of Government would depend upon the outcome of the meeting and the official review.

DAVID PASCALL

Ref.A084/159

MR TURNBULL

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Industrial Pollution

In your minute of 12 December 1983 you said that the Prime Minister would welcome my views on the machinery of Government for dealing with questions of industrial pollution and on how it might be strengthened, in view of the notes presented by the Policy Unit on 9 December.

The existing machinery

2. Many departments have responsibility for particular areas of pollution: the Departments of Trade and Industry, Energy and Transport, the Minister of Agriculture, Fisheries and Food, the Department of the Environment (waste disposal), and the Department of Employment and the Health and Safety Executive. A general co-ordinating responsibility rests on the Department of the Environment. This is exercised through a Central Directorate on Environmental Pollution, headed by an Under Secretary with four divisions dealing with policy planning and co-ordination, European Community and other international co-ordination, toxic substances and economics and statistics. The Directorate reports to the Chief Scientist, Department of the Environment (Dr Holdgate). It is supported by scientific advice from the Department of the Environment, and by independent advice from the Royal Commission on Environmental Pollution.

3. The Directorate is the successor to the Central Unit on Environmental Pollution, which started life in the Cabinet Office and was transferred to the Department of the Environment in Autumn 1970.

4. There is also an Official Committee on Environmental Pollution (EP), chaired by the Cabinet Office (Mr Gregson), which is supported by a working group on detailed issues chaired by the Department of the Environment. These committees have hardly been used at all.

5. There is no Ministerial committee specifically charged with questions of environmental pollution. Questions requiring interdepartmental discussion at Ministerial level usually go to E(A).

Comment

6. I believe that the Policy Unit is quite right to say that the handling of questions of environmental pollution has been inadequate. My inquiries suggest that this is because the general co-ordination on questions of environmental pollution has taken a low place in the Department of the Environment's priorities for policy attention and staff resources, and because the Central Directorate has become largely reactive and does not sufficiently try to foresee problems or take a lead. Persistent attempts by the Cabinet Office to get issues such as acid rain brought to the Official Committee (EP) have been choked off by the Department of the Environment, and issues have been dealt with by interdepartmental correspondence as the Department of the Environment thought necessary. Mr Gregson has however - indeed already had before you sent me your minute - concluded that a stocktaking of all the main issues is required, and asked the Department of the Environment to prepare and circulate to his Committee, for discussion later this month or early next, a paper which:

- i. sets out the overall policy framework on environmental protection within which DOE are seeking to operate both nationally and internationally;
- ii. takes stock of the environmental protection issues likely to come up during 1984 which may give rise to significant interdepartmental and/or Ministerial interest;
- iii. identifies, so far as is practicable at this stage, potential areas of difficulty, so that we can consider what steps may be necessary to expose policy options and resolve differences in good time before the Government has to take up a public position.

Possible Changes

7. We shall be better able to see whether the official machinery as it now exists is capable of performing better, when we see the results of Mr Gregson's initiative. Whatever those results, however, I am sure that the subject needs more high-level Ministerial attention. I agree that it would be useful to identify a group of Ministers specifically charged with this subject; that could well be a new Sub-Committee of E. The Secretary of State for the Environment would probably feel that he should be asked to chair it, but this is pre-eminently a subject where industrial and environmental interests conflict, and it would probably be better not to have a representative of either as chairman. Unless the Prime Minister wanted to take it on herself, I suggest the Lord President or the Lord Privy Seal (or conceivably the Chancellor of the Duchy of Lancaster, though he might be thought to be too parti pris for industry). Other members should include the Secretaries of State for Trade and Industry, Energy, the Environment, Employment and Transport, the Minister of Agriculture and the Chief Secretary, Treasury; and perhaps the territorial Ministers. Mr Gregson's official committee could then report to the new Ministerial sub-committee its conclusions in the review which Mr Gregson has commissioned.

8. I have considered what changes there might be in the arrangements at official level. I believe that the existing arrangements are capable of providing a better service, if the Department of the Environment is prepared to put better staff into the Central Directorate, particularly at the senior levels, and the Secretary of State and other Ministers in the Department are given clearly to understand that environmental pollution requires more political attention, forethought and active pursuit from the Department of the Environment than it seems to have been getting. If that is the course that the Prime Minister decides upon, she will want herself to talk to the Secretary of State for the Environment, and I will talk to his Permanent Secretary about the staffing.

9. But at a time when the Secretary of State for the Environment is to take up with problems of local government organisation and finance, the Prime Minister may think that this course risks not achieving what is needed. The alternative would be to recreate a small unit in the Cabinet Office - like the Information Technology Unit - which could be given the task of identifying potential problems of environmental pollution and taking the initiative in getting them addressed by the departments concerned, reconciling conflicting interests as far as possible, and preparing reports for Ministers. Such a unit could work with a "Minister for Pollution" (presumably in the Department of the Environment) as the Information Technology Unit worked with Mr Baker as the Minister for Information Technology, but it would become in effect an executive secretariat for the new Ministerial sub-committee. It would in effect take out the nucleus of the Central Directorate, and we should have to think carefully what to do about the rest of the Central Directorate's functions, and the unit's relations with the Department of the Environment.

10. But there would be disadvantages in this course. It would cause difficulties with the Department of the Environment. It would cause some additional strains and tensions within Government (as the Information Technology Unit did). And, since the unit's existence would certainly become known, it could raise expectations which it might well not be possible or desirable to match by subsequent policies and allocation of resources.

11. On the whole, therefore, I recommend setting up a new Ministerial sub-committee of E, as proposed in paragraph 7, but reserving a decision on changes in the official arrangements until we have the results of the review which Mr Gregson has put in hand. It would be useful if the Prime Minister set the scene for the establishment of a new sub-committee of E and laid the political foundations for a sharper and more sensitive approach to the problems of environmental pollution by holding a meeting of the Ministers chiefly concerned, and then by saying something in Cabinet, for which I would provide her with a brief.

P.01205

DRAFT LETTER FOR THE PRIVATE SECRETARY TO THE PRIME MINISTER  
TO SEND TO THE PRIVATE SECRETARY TO THE SECRETARY OF STATE  
FOR THE ENVIRONMENT

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ENVIRONMENTAL POLLUTION

The Prime Minister has become increasingly concerned in recent months that the Government's public stance on environmental pollution matters both nationally and internationally often appears defensive and reactive. The Government is properly concerned to evaluate the scientific evidence and to balance environmental and other considerations responsibly, but it is easy for pressure groups both at home and abroad to make the running. Where positive policy changes have been made, for example relating to lead in petrol, the Government has not always received full credit.

2. The Prime Minister understands that the Official Committee on Environmental Protection (EP) is about to take stock of the issues likely to come up during 1984 to identify potential issues of difficulty so that policy options can be exposed in good time before the Government has to take up a public position. She has instructed the Secretary of the Cabinet to ensure that EP completes this report as

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quickly as possible. As soon as it is available she has it in mind to have a meeting with your Secretary of State and the other Ministers mainly concerned to review the Government's overall policy on environmental pollution and the scope for improving its presentation.

3. I am sending copies of this letter to the Private Secretaries to the Lord President, the Foreign and Commonwealth Secretary, the Secretaries of State for Energy, Trade and Industry, Employment and Transport, the Minister of Agriculture, the Chief Secretary, Treasury and the Secretary of the Cabinet.

CONFIDENTIAL

File



289  
ber Mr. Mount

10 DOWNING STREET

*From the Private Secretary*

SIR ROBERT ARMSTRONG

INDUSTRIAL POLICY *POLLUTION?*

The Prime Minister has received the attached paper from the Policy Unit. She acknowledges that there is a problem in this area, both of co-ordination of policy and of its presentation. She proposes to call a meeting of the relevant Ministers, but before doing so would welcome your views on the machinery of Government for dealing with these questions and on how it might be strengthened.

MR. A. TURNBULL

12 December 1983



PRIME MINISTER

4

INDUSTRIAL POLLUTION

This note is well timed. Bernard has become increasingly concerned about the co-ordination of information and he is setting up a meeting of information officers in the Departments concerned.

The problem, however, runs deeper than presentation as responsibility through Whitehall is extremely diffused. There is no-one whose responsibility it is to co-ordinate the various parts of Government and to present the case strongly.

The Policy Unit have suggested a meeting of Ministers, following which an environment sub-committee of E could be set up. My understanding is that there is already such a committee at official level but that it has relatively little status. In consequence many of these questions get dealt with in the committee on European questions where the slant is always what the UK should be doing to keep in step with Europe rather than try to identify what is the best course in itself.

Before calling a meeting of Ministers, you might want to take advice from Sir Robert Armstrong on how he thinks the machinery of Government could be strengthened in this area.

AT

What about the Environment

Ronald Court under  
D.E.S. ? It takes  
introduces.

9 December 1983

CONFIDENTIAL

cc (BT) JOP  
9 December 1983  
Policy Unit

PRIME MINISTER

INDUSTRIAL POLLUTION

I attach a note by David Pascall. I am sure that this problem is going to provide some of the sharpest political challenges in this Parliament. The Sellafield saga is genuinely worrying. There may be more to come.

At present, we appear to be reacting tardily and shamefacedly to pressures - from Europe, from the Royal Commission, from TV programmes. We do not seem to initiate policies or take the lead in Europe often enough.

One reason is that the DoE is in reality only a glorified Ministry of Housing and Local Government. William Waldegrave confirms our impression that its Environment staff is small and of poor quality.

As a result, DoE tends to be trampled on by the vested interests represented by MAFF, DTI and Energy. Even in cases where Britain could easily take a lead - eg "lean-burn" car engines - DoE finds it difficult to get a hearing.

The public interest is not properly served by these arrangements. And the Conservatives tend to be branded as uncaring Philistines - thus creating a breeding ground for the SDP and the Liberals.

David suggests a meeting of Ministers to raise the profile of the whole issue. You might then wish to set up an Environment Subcommittee of E to give DoE a continuing forum in which to raise these questions at a level which reflects their true political importance.

Yes not now to R.C.

FERDINAND MOUNT fm

CONFIDENTIAL

PRIME MINISTER7 December 1983INDUSTRIAL POLLUTION: PUBLIC CONCERN AND GOVERNMENT POLICYThe General Problem

The recent publicity given to potential health hazards associated with the Sellafield (formerly Windscale) nuclear reprocessing plant is just the latest example of a more general problem.

We are losing public confidence. The Government is continually being forced on to the defensive in the face of public concern over pollution issues. In some cases, subsequent investigation has revealed a justified need to make policy changes. In others, we have not received credit for positive and responsible policy changes.

For example, the public perception of our approach to lead in petrol is of a Government forced to take action following the activities of CLEAR. In fact, we took a responsible decision and did not use the lack of conclusive scientific evidence as a reason for delaying action.

On acid rain, we are perceived as being indecisive and indifferent to a major environmental problem. However, we are faced with the dilemma that the massive investment which would be needed to reduce sulphur dioxide and nitric oxide emissions from industrial and utility power plant would not necessarily solve the problem.

At Sellafield, the public has gained the impression that it needed a television programme to highlight a potential problem which was subsequently shown to have been causing Government concern.

Of course, these issues are highly emotive and complex. It is particularly easy for pressure groups to influence public opinion and to embarrass the Government on specific issues. Government, on the other hand, has to be vigilant and act responsibly. We do not want to jeopardise economic recovery for the sake of gold plated environmentalism yet we must give proper attention to environmental concerns. This usually requires very difficult

trade-offs between environmental/health standards and the costs of implementation, a concept which the public find difficult to understand.

Government is going to be continually faced with a series of difficult issues. The social and environmental acceptability of scientific developments and new technologies will be a major challenge. We must retain public confidence in our response.

### The Issues

We enclose a note which discusses some of the issues which we consider likely to be most important.

Many are likely to be the subject of interdepartmental argument. The Departments of Energy, Trade and Industry and Agriculture tend to defend the interests covered by their departments and do not always take pollution issues seriously enough.

Industry generally often gives the impression of being impervious to the public good although the balance between industrial costs and environmental standards is always difficult.

The executive control of environmental policy is widely spread both throughout Government departments and other organisations, notwithstanding the central role of the Department of the Environment. This results in inconsistencies of approach.

Our approach in the EEC is defensive and we are becoming increasingly isolated.

### What is to be Done?

The need to act responsibly in these areas will always tend to require a cautious approach. However, we must be better at identifying those areas where we are potentially vulnerable. Once identified, we need to take positive steps to improve both policy formulation and presentation. We must obtain greater credit for what we are doing.

The scientific data base in many areas is of very variable quality. We must ensure that adequate research, not necessarily

publicly funded, is being carried out on both pollution effects and on more cost-effective technologies.

In many areas we shall still be concerned more with political than scientific questions. Unless we adopt a more positive approach generally, we are likely to be continually reacting to public and international pressures. We may be forced into unnecessary or inappropriate investment.

We shall only regain public confidence if we are leading rather than following public opinion.

Recommendation

✓ We suggest that a small meeting of relevant Ministers under your Chairmanship could usefully consider these questions including particularly

- the importance of restoring public confidence
- the need to identify those areas where we are potentially vulnerable
- how the Government could adopt a more positive approach to both policy formulation and presentation.

DLP.

DAVID PASCALL

7 December 1983INDUSTRIAL POLLUTION: THE ISSUES1. Acid Rain

The problem of acid rain will not go away and public concern is growing.

There is now general scientific acceptance that the causes of acid rain are not sufficiently understood to justify confidence that any of the proposed solutions will be effective. Even the Germans now accept that reducing sulphur dioxide emissions from power stations alone is unlikely to help although public pressure for action is forcing them in this direction.

Acid rain presents a far broader problem than that of sulphur dioxide alone. Up to half the acidity in rain and mist may be due to nitric acid. Ozone and other oxidants from car exhausts play a crucial role in converting sulphur dioxide and nitrogen oxides to strong acids. These oxides also cause direct tree damage. The interaction between deposited acids and the chemistry of waters and soils is complex. Land use practices, farming methods and forestry can all contribute to increased acidity.

It is no longer likely to be enough for us to deflect calls for action with the argument that more research is needed to understand the problem. It is true that we have reduced sulphur dioxide emissions by 30% since 1972, albeit from a higher level than the rest of Europe. However, our current defensive attitude coupled with that of the CEEB is likely to force us sooner or later into measures which may not be appropriate or cost-effective.

We need to be more positive in recognising that major new fossil fuel plant will require cost-effective systems for reducing emissions. We should acknowledge and promote cost-effective methods of reducing emissions on current plant.

We need more scientific monitoring and research on causes and solutions. The Royal Society's recently announced £5 million programme financed by the CEEB and NCB and the Department of the Environment's £1 million per annum programme are only small steps in the right direction.

## 2. Car Exhausts

We have made a major step forward in our proposals for removing lead from petrol. We have also agreed in Europe on further reductions in other emissions such as unburnt hydrocarbons, nitric oxides and ozone. This will not only improve the quality of the environment generally but will also contribute towards solving the problem of acid rain.

Nevertheless, we are under strong pressure to go beyond current agreements. The Germans are pressing for standards that could only be met by catalytic converters on car exhausts. Although catalyst systems could offer significant pollution reductions, these are unlikely to be achieved in practice. There are a range of technical and operational problems associated with such systems which also impose a substantial energy penalty.

A more positive approach and an opportunity for a positive UK initiative is through engine design.

Most European manufacturers are developing 'lean burn' engines. An increased air:fuel ratio in the combustion chamber ensures more complete combustion so that hydrocarbons and carbon monoxide are virtually fully oxidised to carbon dioxide. In addition the combustion temperature is kept down, so reducing the amount of nitrogen converted to nitrogen oxides. As a result fuel economy is improved and pollution reduced for only a small increase in cost.

The removal of lead and pollution controls which stimulated the development of lean burn engines would be major achievements for the Government. Public health would be protected. The consumer would benefit from improvements in fuel economy and engine design. Octane ratings could be optimised by balancing refinery costs against fuel consumption costs. The environment would benefit through a further reduction in nitrogen oxides, hydrocarbons and ozone. The costs and potential technical drawbacks of catalyst systems would be avoided.

Such a policy would show the Government to be taking the initiative in meeting the best interests of individuals, industry and the environment.

### 3. Nuclear Wastes

The discharge of low level radioactive waste at Sellafield is a source of great public concern. Irrespective of the facts of the situation, recent events have severely shaken public confidence. The Government's commendable speed in asking Sir Douglas Black to enquire into evidence that Sellafield is connected with abnormally high rates of cancer in the local population has only added to this concern. BNFL's complacent attitude has been equally disturbing, particularly as it has now been revealed that the Government has been putting considerable pressure on BNFL to improve the situation.

The ability to dump any nuclear wastes at sea is likely to be shortlived. Political considerations in the face of international opinion are likely to make dumping unacceptable irrespective of any scientific justification.

We are already seeing the public controversy which Nirex's plans for the disposal of intermediate level waste is generating. The Government has already accepted that high level wastes will be stored for fifty years. It may prove necessary to abandon plans for disposal of intermediate waste and to store them instead under surveillance. Appropriate treatment could then take place at a later date when technologies are further advanced.

It is essential that Government restores and maintains public confidence in the disposal of all nuclear waste.

### 4. Marine Environment

The marine environment generally will become a major problem for the Government. The UK dumps considerable quantities of sewage, sludge and industrial waste and international controls are likely to present greater problems for us than for most other countries. Next year the German Government is convening a European Ministerial Conference on the North Sea where we could well be isolated.

### 5. Environmental Quality Objectives

The UK is continually out of step with the rest of the EEC



on the question of Environmental Quality Objectives (EQOs) versus fixed emission limits.

We favour EQOs which enable us to assess the ability of the receiving media to accept pollution discharges. We have consistently opposed fixed emission limits favoured by our community partners. With fast flowing rivers, estuary discharges and island status the use of EQOs enables us to justify higher discharges than would be acceptable in Europe.

However, there are some classes of industrial pollutants where reductions in absolute terms are desirable on environmental grounds. In addition the greater flexibility offered by EQOs is often used by industry to minimise the costs of pollution control.

In view of our continued political isolation in the EEC, we need to review whether acceptance of fixed emission limits in some cases would not have both political and environmental benefits. It is expected that the forthcoming tenth Royal Commission Report will also recommend that we rethink our position and approach to Europe on this issue.

#### 6. Agricultural Environment

There will be increasing conflicts concerning environmental standards, the productivity of farm land and the preservation of the countryside. The Wildlife and Countryside Act is giving increasing cause for concern. A significant part of the compensation paid to farmers under this Act reflects subsidy forgone. In effect, farmers are being subsidised for not being subsidised.

#### 7. Toxic Effects of Chemicals

There is increasing concern about the toxic effects of chemicals with particular emphasis upon the relationship to cancer. Published research is conflicting. Policy decisions could have a significant impact on the chemical industry.

#### 8. Asbestos

There is growing public concern about the level of asbestos

present in many domestic situations - ironing boards, some cements, boarding, roofing, some pipe lagging, brake drums etc. Although the Health and Safety Executive are tightening up regulations, there is no threshold level for asbestos which means that some people will always be at risk. This, coupled with the practical difficulty of improving the situation, makes asbestos a potentially difficult problem.

9. Pesticides and Fertilisers

There is already public concern about certain pesticides including 2-4-5T which contains very small quantities of dioxin. Nitrates have been put forward as a cause of gastric cancer although this has not been proved. The Royal Commission suggested that it was preferable to take nitrates out of water systems rather than to ban nitrate fertilisers. In all these areas a difficult balance will need to be drawn between compulsory controls and voluntary codes of practice.

DLP.

DAVID PASCALL