



cc D.P.

Ref. A084/1021

PRIME MINISTER

Environmental Pollution

Your Private Secretary's letter of 24 January recorded your concern that the Government's public stance on environmental pollution matters, both national and international, often appeared defensive and reactive. You instructed me to arrange that the Official Committee on Environmental Protection (EP), which was about to take stock of issues likely to come up in 1984, should complete its report as soon as possible so that you could use it as a basis for a meeting of Ministers, now arranged for 5 April, to review the Government's overall policy on environmental pollution, and the scope for improving its presentation. The report is now attached.

2. The report deals first with the substance and presentation of the Government's general approach to environmental pollution, and then with the main specific issues arising in 1984: the Government's reply to the Tenth Report of the Royal Commission on Environmental Pollution; acid deposition; vehicle emissions; radio-active waste; pollution at sea; and agriculture and the environment. The points for consideration by Ministers are brought together in paragraph 51.

3. I am sending copies of this minute and the attached report to the Lord President of the Council, the Foreign and Commonwealth Secretary, the Secretaries of State for Energy, Scotland, the Environment, Trade and Industry, Employment and Transport, the Minister of Agriculture, Fisheries and Food, the Chief Secretary, Treasury, and the Parliamentary Under Secretary of State, Department of the Environment (Mr Waldegrave).

ROBERT ARMSTRONG

30 March 1984

ENVIRONMENTAL POLLUTION

Report by the Official Committee on Environmental Pollution

1. The Prime Minister has expressed concern that the Government's public stance on environmental pollution matters both nationally and internationally often appears defensive and reactive. This report by the Official Committee on Environmental Protection (EP) is intended to provide a basis for a discussion by Ministers of the Government's overall policy on environmental pollution and the scope for improving its presentation, with particular reference to issues likely to come up during 1984. The Committee had particularly in mind the wide-ranging Tenth Report of the Royal Commission on Environmental Pollution, published on 22 February 1984 (Cmnd 9149).

GENERAL ISSUES OF POLICY AND PRESENTATION

2. Environmental protection in the UK has a long history, and many successes. Such recent achievements as the elimination of urban smog and the restoration of the River Thames are well known. A decade ago we were regarded as setting an international example of environmental improvement. Progress has continued, as DOE's published environmental protection and water statistics show. But our approach has evolved along different lines to that of other members of the European Community, and the consequent arguments have tended to overshadow our achievements abroad and to fuel criticism from pressure groups at home. We need urgently to correct this.
3. The starting point for UK environmental protection policy, as with other policies, is a judgement about costs and benefits. Three particular features of our approach have attracted criticism:
 - i. our emphasis on Environmental Quality Objectives (EQOs), rather

than the Uniform Emission Standards (UES) favoured elsewhere in Europe;

ii. our requirement for use of Best Practicable Means (BPM);

iii. our demand for scientific evidence on which to base policy.

4. These are interlinked. An EQO defines the physical, chemical or biological state in which a part of the environment should be maintained. In turn, this rests on scientific judgement of the relationships between pollutants liable to be released and their effects. Best practicable means are the technical measures best able to abate pollutant discharges at acceptable economic cost (in contrast to "best available technology" which neglects the economic dimension).

Environmental quality objectives

5. In the UK we have used EQOs as the foundation of our water pollution control policy. They provide a means by which a Water Authority can regulate polluting discharges so as to maintain a water body in a state appropriate to its use, but to utilise the capacity of that body safely to receive some discharges. It follows that the standards for such discharges have to be set according to the characteristics of the receiving water - and its use. In contrast, the application of the same standard everywhere (UES), as favoured elsewhere in Europe partly in order to equalise the cost burden on industry, denies the principle of legitimate use of the receptive capacity of the environment.
6. The criticisms of EQOs partly result from this and partly from doubt over the science on which particular objectives rest. Forecasts of the behaviour of pollutants cannot always be relied on (for example the accumulation of about a quarter of a tonne of plutonium in the sediments of the Irish Sea was not foreseen when the first discharge limits for Windscale/Sellafield were set). There are arguments, therefore, for minimising releases to the environment of the most hazardous substances regardless of the quality of the receiving air or water, as a

precaution. It is also argued that by using the diluting capacity of British airs and waters we pass pollution on to our European neighbours and should minimise our discharges for their sake.

Best practicable means

7. A further argument arises over the approach we should adopt if we do seek to minimise releases. Since the 1860s we have used "best practicable means" (BPM) to curb releases of pollutants to air from major industries (generally without setting EQOs, on the grounds that air masses move and mingle in such a way as to make prediction of concentrations and effects impracticable). The use of BPM (set on a process by process basis by the Industrial Air Pollution Inspectorate) has undoubtedly allowed major improvements to the environment without imposing crippling costs on industry and there is a broad consensus in the UK that it remains the right approach wherever we decide that discharges should be minimised. Some European governments, however, consider that certain pollutant problems (like acid rain) are so serious that "best available technology" should be employed to control the emissions involved despite the heavy cost burdens that result.

The general approach in the future

8. Officials do not advise a rejection of any of the three principles that have underlain the British approach. But there is a case for reconsidering both how we present it and how we apply it in some circumstances.
9. So far as presentation is concerned, the use of best practicable means to achieve environmental quality objectives, defined on the basis of the best available scientific evidence, forms a logical system we need to explain better. The approach allows economic, scientific and social factors all to be taken into account in formulating policy. It allows alternative ways of disposing of pollutants - for example sea dumping landfill or incineration of sewage sludge - to be assessed to give what the Royal Commission terms the "best practicable environmental option". Officials

consider that in presentation it may sometimes be desirable to place less emphasis on the EQO approach by itself, stressing instead the concept of the "best practicable environmental option". The rationale behind this approach should be explained clearly, simply and forcefully.

10. There is one area where we should consider a change in policy. However logical the EQO principle, there is an argument for minimising releases of the most toxic pollutants (such as mercury, cadmium, lead or persistent biocides) partly because of scientific undertainty over their long-term effects. We already adopt this approach for radioactive substances and air pollutants. There may also be a case for minimising the release of pollutants liable to be transported across international frontiers. Even if we concede this point, however, we should stand firm on the need for BPM, with its economic dimension, in such circumstances.

11. Ministers are invited to agree that:

i. we should continue to support a scientifically-based EQO approach generally, as a logical and cost-effective foundation for environmental policy;

ii. we should, however, accept the use of "best practicable means" to minimise releases to water and land as well as air of the most toxic and persistent substances;

iii. we should ensure that the overall logic of the UK approach, with stress laid particularly on the concept of "best practicable environmental option", is much more clearly publicised and appreciated.

12. This general stance on policy needs to be reinforced by action in the following areas:

- research
- more positive tactics in international discussions

- wider provision of information
- better publicity for past achievements and current programmes.

Research

13. Our capacity to set an appropriate EQO depends on our understanding of the behaviour of pollutants in the environment and the quantitative relationship between exposure and effects. The development of "best practicable means" similarly depends on the continuing evolution of cost-effective abatement technology. Both demand research, and the UK insistence on this is hard to fault. But our stress on this need is attacked by environmental pressure groups and by some other countries who see it as a delaying tactic and point out that while we wait for certainty irreparable damage may be done.
14. Currently, Government spends some £29m on environmental pollution research, £14m of it through DOE. It has been a weakness, now corrected, that our effort on some sensitive topics (notably "acid rain") declined in recent years. All departments agree that it is essential to the credibility of our policy that we demonstrate that we are devoting adequate resources to answering the questions to which we attach importance; and that we are seen to be prepared to implement measures justified by research findings. Departments therefore need to re-examine the priority given to expenditure on environmental pollution research within their existing programmes.
15. There is a question of how far such research should be the responsibility of Government and how far of industries and companies responsible for pollution. Potential polluters may be expected to recognise the impact of their industrial processes and to be concerned with the development of technology to limit this damage. On the other hand, research by companies purporting to show that their products or emissions do not have harmful effects tends to lack credibility unless confirmed by disinterested scientists. The right approach may therefore be that basic and some

applied work on establishing the causes and effects of pollution should be funded by Government, but that manufacturers should be expected to provide evidence from trials of the properties of their products and to bear at least some of the cost of monitoring and most or all of the cost of development work related to abatement. In some cases, collaborative research may be appropriate, with Government expressing an intention to implement control measures once the necessary technical foundations have been laid, and industry funding part of the consequent work with an eye not only on the need to reduce emissions but also on markets for pollution control equipment. There may also be a case for getting industry to bear more of the cost of research related to Government control measures, for example by introducing higher charges for particular forms of control (eg licences for sea dumping) related to the quantity of pollutant involved.

16. Ministers are therefore invited to agree:

i. that the credibility of the Government's stance on environmental pollution both nationally and internationally depends upon the adequacy of its scientific foundation;

ii. that departments should re-examine the priority given to expenditure and effort on environmental pollution research within their existing programmes and overall limits on resources;

iii. that departments should find ways of encouraging industries and companies to devote more resources to research and development on environmental pollution and its abatement.

International relations

17. The discussion in the earlier paragraphs of this paper has inter alia suggested ways in which the United Kingdom Government's position might be improved internationally. Departments agree that it is a proper and necessary objective of United Kingdom policy on environmental pollution to be seen as a responsible nation with a proper concern for effects not just on the national but also on the regional and world environment. On the

other hand, many departments consider that the United Kingdom should continue to resist those pressures for harmonising pollution regulation which are motivated largely or solely by the desire to equalise cost burdens. Departments consider that the main need internationally is for the UK to be seen less as obstructively reacting to other countries' proposals and more as the promoter of sound environmental proposals of our own. Some specific opportunities for making constructive proposals, notably in relation to the UK's initiatives on lead in petrol and on vehicle emissions, are discussed later in this paper. Ministers are invited to endorse this general approach.

Availability of information

18. Criticism of the Government's policies has been assisted by the withholding of information about the composition of emissions to the environment. The Royal Commission has drawn attention to this in several reports and their Tenth Report contains the following recommendation (7.8):

"A guiding principle behind all legislation and administrative controls relating to environmental pollution should be a presumption in favour of unrestricted access for the public to information which the pollution control authorities obtain or receive by virtue of their statutory powers, with provision for secrecy only in those circumstances where a genuine case for it can be substantiated."

They also make a number of specific recommendations in accordance with this general principle. These recommendations are likely to attract wider support as part of this year's campaign for greater freedom of information.

19. Departments agree generally that, while there may be a number of cases where national security or commercial sensitivity justify secrecy, a policy of open disclosure of what is released to the environment under the various authorisations given to industry by statutory authority seems most likely to sustain public confidence and get the Government a good press.

Such a policy cannot at present be implemented in all areas because of statutory barriers.

20. Ministers are therefore invited to consider whether they agree:

i. that the general approach should be to eliminate unnecessary secrecy;

ii. that departments should examine their policies and practices, including relevant legislation, with a view to open disclosure subject to the minimum number of exceptions on grounds of national security or commercial sensitivity.

Publicity for past achievements and current programmes

21. All departments are agreed that the United Kingdom could do much more to secure credit both nationally and internationally for improvements in the environment achieved in recent years and current programmes of action. The Annex to this paper briefly illustrates some of the points which might be put across. Many public events provide an opportunity for this and in paragraph 24 a specific initiative is proposed.

SPECIFIC ISSUES

22. The main specific issues likely to arise in 1984 are as follows:

- the Government's reply to the Tenth Report of the Royal Commission on Environmental Pollution
- acid deposition
- vehicle emissions
- radio active waste
- pollution of the sea

- agriculture and the environment

The remaining paragraphs of this paper discuss these in more detail.

Reply to Tenth Report of the Royal Commission on Environmental Pollution

23. The Royal Commission's Tenth Report "Tackling Pollution - Experience and Prospects" was constructive and moderate in tone. The Government is committed, in a Parliamentary answer, to do its best to respond constructively" by the end of the Session". Departments agree that the reply to the Report provides an ideal opportunity for a wide-ranging positive statement of Government policy on environmental pollution which would take into account the points about the substance and presentation of policy discussed in the earlier sections of this paper. However, the reply will not be well received unless the Government is able to respond positively to several of the Royal Commission's specific proposals, for example those on the availability of information. The Department of the Environment is currently consulting other departments about the detailed recommendations and the possible content of the Government's reply.
24. The Committee considered whether sufficient progress could be made on specific issues to permit publication of the Government's reply just before the London Economic Summit which begins on 7 June, in order to make it easier for the Prime Minister to adopt a positive stance on the environment in that forum. Departments have concluded, however, that this would not be practicable because a number of major proposals require thorough analysis which cannot be completed by late May. They recommend instead that a separate, short, readable statement of UK environmental achievements and aims should be prepared for publication shortly before the London Economic Summit.
25. Ministers may wish to consider whether the timing of the Government's reply to the Royal Commission Report should be before the Summer Recess or in the autumn before the end of the 1983-84 Session of Parliament.

26. Ministers are invited:

- i. to endorse the proposal that the Government's reply to the Royal Commission Report should be used as an opportunity for a major wide-ranging positive statement of Government policy on environmental pollution;
- ii. to instruct departments to examine the detailed recommendations with a view to responding constructively and positively to as many as possible of them;
- iii. to endorse the preparation of a short statement of UK environmental achievements and aims for publication shortly before the London Economic Summit.
- iv. to consider whether they see advantage in publishing the Government's reply before the Summer Recess.

Acid deposition

27. In Europe, the current dominant environmental issue is the movement of air pollution across frontiers and the fear that this leads to acidification of the environment through the deposition of sulphur and nitrogen compounds either in dry form (particles and gases) or in wet form ("acid rain"). Damage to forests and the disappearance of fish in rivers and lakes have been attributed to this deposited acidity. A clear UK line, which can be argued positively and vigorously, will be needed for the following major international discussions:

- i. the international conference on acid deposition being convened by the Federal Republic of Germany on 25-27 June 1984;
- ii. the first discussion of the EC directive on large combustion plants at the Environment Council on 28 June 1984;
- iii. the meeting of the Executive Body of the UN ECE convention on

Long Range Transboundary Pollution in September 1984.

28. Acid deposition raises in an acute form most of the general issues discussed in the earlier sections of this paper. The UK's geographical position means that up to half our emissions of sulphur dioxide can leave the country on a westerly wind. Scandinavian governments allege that such emissions from our power stations and industrial plants are harming their environment (especially fisheries). The Federal Republic of Germany, which is under severe internal pressure because of the damage to its forests, wants to ensure that emission controls are applied on a wide European basis. There is, however, much uncertainty and dispute about the scientific evidence, for example about the extent to which acidification may be caused by local pollutants rather than long-range pollutants and about the cost effectiveness of the measures which would be required for controlling the emission of sulphur and nitrogen compounds. Nevertheless the proposed EC Large Plant Directive requires that total national emissions from such plants of sulphur dioxide (SO₂) and nitrogen oxides (NO_x) should be reduced by 60 per cent and 40 per cent respectively by 31 December 1995 from the 1980 level. Member states would be required to draw up programmes by 31 December 1986 to meet these targets. All new and substantially altered plants would be required to meet the specified emission limits from 1 January 1985. Acceptance in full of these proposals would involve in the case of power stations additional UK expenditure of some £2 billion capital and £400 million current annually and would raise electricity prices by some 5% phased over ten years.
29. The Department of the Environment's judgement, supported by the Foreign and Commonwealth Office, is that it is neither desirable nor politically sustainable for the UK to remain wholly opposed to the directive's proposals. Other departments, notably the Department of Energy, Department of Trade and Industry and the Treasury, are seriously concerned about the very large costs which would be imposed by the directive's requirements on UK electricity generation, and thus electricity consumers, and on many other large industrial plants.
30. It has therefore been agreed that a Working Party of the Official

Committee on Environmental Protection (EP(W)) should carry out an urgent study (with a report by mid-April) of costs and benefits associated with measures to reduce emissions of sulphur dioxide and nitrogen oxides. EP(W) will draw up possible profiles for the reduction in emissions, with associated costs. It will also examine the practicability of pilot installations.

31. Ministers are invited to note:

i. the need for a clear UK line on acid deposition which can be argued vigorously and positively in international discussions from June onwards;

ii. that major and difficult decisions will be required not later than May in the light of the report from EP(W).

Vehicle emissions

32. Vehicle emissions are another source of air pollution, though a relatively minor one in the UK (eg they contribute less than 10 per cent of nitrogen oxides and sulphur oxides leading to acid deposition). Our general policy hitherto has been to concentrate on controlling emissions that are a nuisance to the public, for example smoke from diesel engines and vehicle noise. On these matters, we have consistently pressed in Europe for more effective standards, and will be making further proposals in 1984/85 based on research and development now in hand (quiet heavy vehicle projects and diesel engine improvements). We are also committed to work for the total elimination of lead from petrol, and we shall need to argue hard for this in Community discussions over the next year. At the same time we, with France and Italy, will need to resist the West Germany proposal for fitting vehicles with 3-way catalysts - these are extremely costly (adding an estimated £2000 million a year to UK motoring expenditure) and rule out the use of fuel efficient engines (the so-called "lean-burn" engine) now under development by European manufacturers, which also offer a substantial reduction in NOx emissions. Ministers have already agreed (in correspondence) that we should make clear to the Commission our objections

to the German proposals, and the necessary action is in hand. In this area the UK has a major opportunity to develop its own positive proposals and seek wider acceptance of them. Ministers are invited to endorse this approach.

Radioactive waste

33. The Royal Commission's 1976 report on nuclear power and the environment (the Flowers report) stressed that a safe means of disposal of radioactive waste was an essential prerequisite for the development of the civil nuclear power programme. Serious problems, nationally and internationally, continue to place this goal in jeopardy. Sea-dumping of low-level waste is being challenged under the London Convention and by British trade unions, and the Council of Europe is to hold a Public Parliamentary Inquiry on radioactive waste in Stockholm this September. Domestically, the two main issues concern the discharges from BNFL's plant at Sellafield and the disposal of solid wastes.
34. Departments agree there is a compelling need to restore public confidence at Sellafield. There will be renewed public interest as the tourist season approaches over whether the beaches can be cleaned up in time to be opened for the summer. Public anxieties will remain about levels of radioactivity along the coast, and are unlikely to be dispelled completely by Sir Douglas Black's report, due in May, into apparent clusters of cancer cases. Progressive revisions to the authorisation for discharges of low-level wastes by pipeline are being formulated by DOE and MAFF. The Government has also said that there will be a comprehensive long-term plan for Sellafield to ensure that its environmental impact meets the highest standards that are reasonably achievable. There is pressure for the complete elimination of discharges, or for them to be made as low as technically achievable in the light of the levels achieved in other countries. The advice of the Radioactive Waste Management Advisory Committee has been sought on the implications of these different objectives, which will include their respective costs and benefits.
35. Ministers are invited:

i. to note that new, more stringent authorisations are about to be notified to BNFL;

ii. to consider whether the measures already announced are sufficient to restore public confidence in Sellafield, or whether other measures should be explored, with a view to a further announcement at about the time of publication of the Black report in May;

iii. to note that in any case a decision will have to be taken later this year about the long-term objective for the reduction of discharges.

36. High-level liquid waste will continue to be stored at Sellafield and Dounreay but there are current problems over disposal of intermediate and low-level solid wastes .
37. Some low-level wastes are buried at Drigg in Cumbria, and until 1983 some other low and intermediate-level wastes were dumped at sea. Trade union opposition prevented the latter operation in 1983, and this route may be difficult to re-open unless two reviews of the scientific evidence (jointly with the TUC, and internationally under the London Convention) produce clearly positive results. There will be no further progress until the autumn of this year at the earliest. If the route is not re-opened, new stores will have to be built for the wastes concerned.
38. The Nuclear Industry Radioactive Waste Executive (NIREX) is identifying suitable sites for new disposal facilities on land for low and intermediate-level wastes. The first two sites (a disused anhydrite mine at Billingham and a former ordnance depot at Elstow in Bedfordshire) have aroused strong local opposition. Before proceeding to public inquiries on particular sites, it may be desirable to Ministers to seek endorsement from Parliament for the policy of early disposal and for the general principles that authorising Departments will use in assessing proposals (which have been the subject of public consultation).

39. Ministers are invited to note:

i. that there will not be progress on the disposal of radioactive wastes at sea before the autumn at the earliest;

ii. the difficulty of finding sites for new disposal facilities on land for intermediate-level wastes, and the implications for the development of civil nuclear power;

iii. that decisions will be required soon on the procedures for public inquiries about land disposal sites, which may involve seeking endorsement from Parliament for the basic policy.

Pollution at sea

40. The Federal German Government has proposed a Ministerial Conference on the North Sea beginning on 31 October 1984. This aims at intensifying action to prevent pollution from land-based sources, from ships, via the atmosphere and by dumping of wastes under a range of existing Conventions and agreements. It brings a threat of conflict and of criticism of the UK because the German approach is strongly towards minimising emissions to the environment even of the substances permitted under present Conventions, and despite evidence that current practices do little harm. There is a strong thrust towards "sharing the cost burden" by making discharges on the coast meet the same standards as those on inland rivers and the UK is under particular pressure to phase out dumping at sea.

41. In official preparatory discussions so far, the UK has succeeded in ensuring that the Conference will have as a primary input the outcome of a scientific review of the state of the North Sea, and that the environmental quality approach should have the same validity as the uniform emission standards approach in relation to North Sea pollution. Our line has been that existing conventions provide adequate protection for the North Sea environment. It remains possible, however, that the UK may be isolated in resisting proposals to phase out sea-dumping in the North Sea over time. This would pose serious problems because some 30 per

cent of all UK sewage sludge goes to sea, along with 2.2 million tonnes of industrial waste and 12.9 million tonnes of dredgings, and alternative sites on land would be difficult to find. The UK objective is therefore to ensure that the North Sea Conference does not close options, but there are some difficult issues about UK dumping at sea in the longer term which will need to be considered in due course.

42. Ministers will have an opportunity later this year to consider in detail the line to be taken in the North Sea Conference itself. At this stage they are invited:

i. to endorse the objective of ensuring that we remain able to dump in the North Sea such wastes as are permitted under international conventions;

ii. to endorse the approach to scientific evidence and to EQOs adopted in preliminary discussions;

iii. to note that the Conference will require careful handling, if the UK is not to appear isolated and obstructive;

iv. to note that there are difficult long term issues about UK dumping in the North Sea which will have to be addressed in due course.

Agriculture and the environment

43. There has been an increasing effort in recent years to seek to harmonise agricultural and environmental interests. MAFF has, for example, recently increased capital grants for agricultural improvement in less favoured areas which may also benefit the environment and has discontinued grants for projects which may damage the environment. Free advice on conservation is available to farmers from the Agricultural Development and Advisory Service.

44. There is, however, some general concern about the implications of

agricultural change for conservation of the countryside, and the House of Commons Select Committee on the Environment have recently indicated their intention of considering the topic. There are also some current specific issues relate to straw and stubble burning; smell and nuisance associated with housed livestock; the safety of pesticides; and the nitrate content of water supplies.

45. The general issue has arisen particularly in relation to the working of the Wildlife and Countryside Act 1981. There is a complaint that agricultural support and financial assistance both under the Common Agricultural Policy and through domestic arrangements have tended to encourage changes such as ploughing of moorland and drainage of wetlands which have either destroyed attractive landscape or seriously eroded wildlife habitats. The 1981 Act created a framework for resolving such conflicts through a "voluntary approach", the prime feature of which was the management agreement under which farmers would agree to forgo the benefit of changes and improvements harmful to conservation in return for compensation. There is now concern that the cost of this approach is too high and that it will not be effective in stemming a tide of change adverse to conservation. Some management agreements are proving very expensive and in National Parks the local authorities are showing reluctance to enter into them. Ministers have, however, taken the view that it is far too early to come to any conclusion on how well the Act is working and that the important thing is to keep it under review.
46. As cereals production has increased, concern has grown about straw and stubble burning. A ban was recommended in the Tenth Report of the Royal Commission but the main alternative method of disposal, incorporation of chopped straw into the soil, interferes with cropping programmes and can reduce yields. The Government announced a substantially strengthened model bye-law on 20 March and the National Farmers' Union is revising its Code of Practice to reflect this and experience last summer.
47. MAFF will be publishing later this year national guidelines for the planning and operation of housed livestock. In addition, DOE are proposing that all buildings intended to house livestock within 100

metres of existing residential property should require planning permission; and are considering changes in the law to enable local authorities to take action if a nuisance is likely to arise rather than, as at present, only after it has arisen.

48. The non-statutory agreement, the Pesticides Safety Precautions Scheme (PSPS), under which manufacturers do not market pesticides without first having attained safety clearance from the Government, has recently run into difficulties both of Community law and of enforcement. The Minister of Agriculture, Fisheries and Food has therefore made proposals to the Ministerial Sub-Committee on European Questions (OD(E)) that regulations to give statutory support to the PSPS should be made under the Health and Safety at Work Act 1974.
49. MAFF and DOE are considering the question of nitrate levels in water supplies with the aim of agreeing a policy line during 1984. The DOE has proposed that the Water Research Requirements Committee, currently being set up, should consider this as a priority area for research. Meanwhile MAFF is increasingly giving emphasis in its advice to farmers to reduce nitrate pollution, along with all other forms of pollution, in current farming practices.
50. Ministers are invited:
- i. to consider whether they are content for the time being for further experience to be gained of the working of the Wildlife and Countryside Act 1981 before taking a view on whether further steps are needed;
 - ii. to take note of the action in train on specific subjects as set out in paragraphs 47 to 50 above, and to consider whether any further action is needed at this stage on these matters.

SUMMARY OF POINTS FOR MINISTERS

51. This paper has reviewed current issues in environmental policy, and their presentation. Ministers have been invited to note, or express views on, a number of points; these are listed below.

a General policy stance (paragraphs 2 - 11)

To agree that the United Kingdom should:

i. continue to support a scientifically-based Environmental Quality Objective approach generally, as a logical and cost-effective foundation for environmental policy;

ii. accept the use of best practicable means to minimise releases to water and land as well as air of the most toxic and persistent substances;

iii. ensure that the overall logic of the UK approach, with stress laid particularly on the concept of "best practicable environmental option", is much more clearly publicised and appreciated.

b. Research (paragraphs 13 - 16)

To agree that:

i. the credibility of the Government's stance on environmental pollution both nationally and internationally depends upon the adequacy of its scientific foundation;

ii. departments should re-examine the priority given to expenditure and effort on environmental pollution research within their existing programmes and overall limits on resources;

iii. departments should find ways of encouraging industries and companies to devote more resources to research and development on environmental pollution and its abatement.

c. International relations (paragraph 17)

To endorse the view that the UK should be seen as the promoter of sound environmental proposals of its own, and not just as reacting to the proposals of others.

d. Availability of information (paragraphs 18 - 20)

To agree that:

i. the general approach should be to eliminate unnecessary secrecy;

ii. departments should examine their policies and practices, including relevant legislation, with a view to open disclosure subject to the minimum number of exceptions on grounds of national security or commercial sensitivity.

e. Publicity for past achievement and current programmes (paragraph 21)

To agree that the United Kingdom should do more to secure credit both nationally and internationally for past achievements and current programmes of action on the lines of the Annex.

f. Reply to Royal Commission report (paragraphs 23 - 26)

i. To endorse the proposal that the Government's reply to the Royal Commission Report should be used as an opportunity for a major wide-ranging positive statement of Government policy on environmental pollution;

ii. to instruct departments to examine the detailed recommendations

with a view to responding constructively and positively to as many as possible of them;

iii. to endorse the preparation of a short statement of UK environmental achievements and aims for publication shortly before the London Economic Summit.

iv. to consider whether there is advantage in publishing the Government's reply before the Summer Recess.

g. Acid deposition (paragraphs 27 - 31)

To note:

i. the need for a clear UK line on acid deposition which can be argued vigorously and positively in international discussions from June onwards;

ii. that major and difficult decisions on the control of sulphur dioxide and nitrogen oxide emissions will be required not later than May, in the light of the report from EP(W).

h. Vehicle emissions (paragraph 32)

To endorse the preparation of policy proposals on "lean burn" engines as a route to the reduction of nitrogen oxide emissions from vehicles, and their deployment in the EC as a positive contribution to environmental policy.

i. Radioactive waste (paragraph 33 - 39)

In respect of Sellafield:

i. to note that new, more stringent authorisations covering radioactive discharges from Sellafield are about to be notified to BNFL;

ii. to consider whether the measures already announced are sufficient to restore public confidence in Sellafield, or whether other measures should be explored, with a view to a further announcement at about the time of publication of the Black report in May;

iii. to note that in any case a decision will have to be taken later this year about the long-term objective for the reduction of discharges from Sellafield;

In respect of disposal:

iv. to note that there will not be progress on the disposal of radioactive wastes at sea before the autumn at the earliest;

v. to note the difficulty of finding sites for new disposal facilities on land for intermediate-level wastes, and the implications for the development of civil nuclear power;

vi. to note that decisions will be required soon on the procedures for public inquiries about land disposal sites, which may involve seeking endorsement from Parliament for the basic policy.

j. Pollution at sea (paragraphs 40 - 42)

In respect of the North Sea Conference:

i. To endorse the objective of ensuring that we remain able to dump in the North Sea such wastes as are permitted under international conventions;

ii. to endorse the approach adopted in preliminary discussions of the need for scientific evidence and for EQOs to have the same validity as uniform emission standards;

iii. to note that the Conference will require careful handling, if the UK is not to appear isolated and obstructive;

iv. to note that there are difficult long term issues about UK

dumping in the North Sea which will have to be addressed in due course.

k. Agriculture and the environment (paragraphs 43 - 50)

i. To consider whether they are content for the time being for further experience to be gained of the working of the Wildlife and Countryside Act 1981 before taking a view on whether further steps are needed;

ii. to take note of the action in train on straw and stubble burning, housed livestock, pesticides and nitrate levels in water supplies, and to consider whether any further action is needed at this stage on these matters.

Cabinet Office

29 March 1984

PUBLICITY FOR PAST UK ENVIRONMENTAL ACHIEVEMENTS AND CURRENT PROGRAMMES

The Objectives

The following points would appear to be particularly worth making in publicity for the UK's past environmental achievements and current programmes:

Historic

- i. the UK being the first country to try to tackle the problem in the aftermath of the Industrial Revolution (Alkali Act of 1863, Public Health Act 1936)
- ii. the successes
 - (a) at home - in air (more hours of winter sunshine in industrial areas); in water (salmon return to the Thames; North Sea) and on land (no toxic wastes problems like Love Canal in the USA);
 - (b) abroad - UK instrumental in setting up London and Oslo Conventions (sea dumping); and prominent in Paris Convention (pollution from land based sources) and MARPOL (marine pollution from shipping). Major contributions to United Nations Environmental Programme (UNEP), OECD and other international bodies.

Present and
Future

- iii. action continuing apace on our remaining "old" problems - (N.B. the Merseyside initiative on water quality);
- iv. more subtle problems - acid deposition, agrochemical run-off, low levels of lead, etc. - now being pursued with equal vigour;
- v. emphasis switching from cure to prevention - eg screening of new chemicals before they reach the market, control of non-hazardous land wastes;

vi. present and future specific international initiatives by UK - proposals for EC Directives on lead in petrol, vehicle noise, anti-fouling paint;

Underlying principles

vii. determination to explain the principles on which our environmental protection policies are based; heavy emphasis on scientific evidence and cost/benefit;

viii. emphasis now increasingly on amenity, as well as public health: to improve the environment, not merely to remove health hazards. (eg aspects of stubble-burning, coal-mining waste on Durham beaches, Wildlife and Countryside Act, Operation Groundwork in NW England).

The Means

a. Using appropriate public occasions to give more ad hoc exposure to particular aspects of pollution control policy.

b. Preparation of comprehensive re-statement of UK environmental pollution policy, in response to the Royal Commission's Tenth Report; and, in the interim, a short pamphlet on achievements and goals, to be published in time for the London Economic Summit.