PREM 19/1216

PART 1

C

Confidential Filing

The Seventh Report of the Royal Commission on Environmental Pollution. (+ Eighth Report on Pollution of the Sea). et seq.

Effect of Acid Rain

ENVIRONMENTAL AFFAIRS

PART 1

September 1979

Referred to	Date	Referred to	Date	Referred to	Date	Referred to	Date
		5.4.84					
10.9.79		13.4.84					
17.9.79		9.5.84					
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PART 1 ends:-

CDL to S/S Env. 31.5.84

PART 2 begins:-

DB to Dr. Nicholson + att.
1.6.84

TO BE RETAINED AS TOP ENCLOSURE

Cabinet / Cabinet Committee Documents

Reference	Date
CC(83) 33rd Meeting	10/11/1983

The documents listed above, which were enclosed on this file, have been removed and destroyed. Such documents are the responsibility of the Cabinet Office. When released they are available in the appropriate **CAB** (CABINET OFFICE) CLASSES

Signed J. Gray Date 16/9/2013

PREM Records Team

Published Papers

The following published paper(s) enclosed on this file have been removed and destroyed. Copies may be found elsewhere in The National Archives.

Command 7644 - Royal Commission on Environmental Pollution: Seventh Report – Agriculture and Pollution. Published by HMSO September 1979. ISBN 0 10 176440 5

Command 8358 - Royal Commission on Environmental Pollution: Eighth Report – Oil Pollution of the Sea. Published by HMSO October 1981. ISBN 0 10 176440 5

House of Commons HANSARD, 12 March 1984, columns 117 to 128: Environmental Pollution

House of Commons HANSARD, 7 March 1984, columns 833 to 835: Environment

Signed J. Gray Date 16/9/2013

PREM Records Team

Prime Minister (2)

The DoE booklet has now arrived. Had Cockfield would have liked more in it on preserving wildlife and the countryside.

Await printed booklet from DoE

DMB 4/6

DMB 5/6

cc DP

CABINET OFFICE,
WHITEHALL, LONDON SW1A 2AS

Chancellor of the Duchy of Lancaster

31 May 1984

Dear Patrick,

BOOKLET ON UK ENVIRONMENTAL ACHIEVEMENTS

Your Private Secretary's letter of 29 May to David Barclay was copied to me.

The booklet seems to have been written almost entirely from the point of view of the control of pollution. The story it tells there is a good one. But the other aspect of the environment, namely the protection of the countryside and of wildlife is dismissed in a couple of column inches. It is as unconvincing as it is short. Unfortunately - for us that is - the potection of the countryside is of great public interest: the popular view is that the Wildlife and Countryside Act has made matters worse not better; and that our own forming policy has subsidized the despoliation of the countryside. I was hoping that this booklet would have provided some of the answers to these criticisms - if answers exist.

I say this because I had been hoping that we could send the booklet to our candidates in the European Elections. But I suspect that its use in that connection would be limited.

I am copying this to the other recipients of your Private Secretary's letter.

Booklet in folder att. to file

Yours,

Arthur

COCKFIELD

The Rt Hon Patrick Jenkin MP
Secretary of State for the
Environment
Department of the Environment
2 Marsham Street
London SW1P 3EB

ENV AFFAIRS : Env Pollution
Sept 79

FILE

10 DOWNING STREET

From the Private Secretary

30 May, 1984

NUCLEAR POWER

I enclose a copy of a letter to John Ballard recording the discussion which took place at Chequers last Sunday after the scientific presentation on acid rain.

There is one point not recorded in that letter of which you should be aware. The Prime Minister felt that it emerged very strongly from the proceedings that an increase in our nuclear generating capacity would be the most cost effective way to reduce our emissions of SO_2. Indeed, Sir Walter Marshall argued that it would actually save the CEGB money.

There was widespread agreement among those present that improvements at Sellafield should have very high priority, since they virtually held the key to the future of the civil nuclear programme. The Prime Minister also commented that the trade unions representating those who worked in the power equipment industry could usefully do more to advance the cause of nuclear power.

I am sending copies of this letter only to John Ballard (Department of the Environment), Ivor Llewelyn (Ministry of Agriculture, Fisheries and Food), and to Richard Hatfield (Cabinet Office).

(David Barclay)

M. Reidy, Esq.,
Department of Energy

RESTRICTED

cc MASTER SET

cc. FCO
D/T
CS, HMT
D/TI
CO (Hatfield)
Dr. Nicholson (CO)
MAFF
SO
WO

10 DOWNING STREET

From the Private Secretary

30 May, 1984.

Pt 1

Acid Rain

Following the presentation on acid depositions which took place at Chequers on 28 May, the Prime Minister chaired a brief discussion. Those taking part were your Secretary of State, the Minister of State (Department of Trade and Industry), Mr. Baker, the Parliamentary Under Secretary of State (Department of Energy), Lord Avon, the Parliamentary Under Secretary of State (Department of the Environment), Mr. Waldegrave, Sir Walter Marshall (CEGB), Sir John Mason, Sir Herman Bondi (NERC), Dr. Peter Chester (CEGB), Dr. Martin Holdgate (Department of the Environment), Dr. Robin Nicholson (Cabinet Office), and Mr. David Pascall (No.10 Policy Unit).

Opening the discussion, Dr. Nicholson said that the morning's presentations had demonstrated two things: that acid depositions were associated with genuine ecological problems; and that the causal links were very uncertain. For each major pollutant extreme solutions had been canvassed (e.g., the draft EEC directive on SO_2 emissions, the Japanese approach to reducing NO_x emissions, and the three-way catalyst used in the United States to tackle vehicle emissions). Grave doubts attached to the cost effectiveness of these measures. There were, however, other possible approaches which were cheaper and could be of benefit.

The Prime Minister reminded the meeting that the UK would be launching an environmental initiative at the London Summit. It was

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/ important

important to be clear about the research which would give the most immediately useful results. A range of views was expressed on this topic. There was support for the programme being conducted under Royal Society auspices, which would provide helpful insights into the situation in Scandinavia. Arguably, however, the greatest political pressure would come from the Germans in relation to forest damage. It was suggested therefore that there were 5 priority areas for research.

(i) The causes of forest decline (including investigation of possible resistant strains);

(ii) The critical variables in the pollution of fresh water (as in the Royal Society's programme);

(iii) The effects of different land and catchment management policies;

(iv) The role of photochemical oxidants;

(v) The cost effectiveness of possible counter measures.

In pursuing these priorities there was a need for full coordination between the various UK bodies involved, and for more effective monitoring across Europe.

The Prime Minister then introduced a preliminary discussion of the UK's policy stance. It was agreed that extreme and expensive options had to be avoided. At the same time, the UK could take credit both for its record in reducing emissions of SO_2 specifically, and for the initiatives it had taken on vehicle emissions (relating to lead in petrol, and to the lean-burn engine). The popular assertion that the UK was a major cause of high SO_2 levels in Central Europe could be rebutted, as could any suggestion that there was a direct causal link between the atmospheric SO_2 and forest damage.

/ Further

Further work was required on probable trends in the UK's emissions on SO_2, NO_x and hydrocarbons. This should take account of known developments, e.g., the commissioning of new nuclear power stations, and provide a base line from which Ministers could judge the need for additional measures. A range of options could then be explored, relating possible target reductions (including the 30% reduction in SO_2 emissions by 1995 which would be implied by membership of the 30% Club) to the cost of achieving them.

Summing up the discussion, the Prime Minister said that the policy issues raised would be considered further by Ministers at a meeting on 19 June. Meanwhile, a defensive brief should be prepared for the London Summit. (The contents of this brief have been specified separately, in my minute of 29 May to Richard Hatfield.)

I am sending copies of this letter to the recipients of my minute to Richard Hatfield of 29 May, and also - with a copy of that minute - to Ivor Llewelyn (Ministry of Agriculture, Fisheries and Food), John Graham (Scottish Office), and Colin Jones (Welsh Office). A copy of this letter also goes to Richard Hatfield (Cabinet Office).

David Barclay

John Ballard, Esq.,
Department of the Environment.

24

CC DP

2 MARSHAM STREET
LONDON SW1P 3EB
01-212 3434

My ref:

Your ref:

29 May 1984

Await printed version.

DJB 29/5

Dear David

BOOKLET ON UK ENVIRONMENTAL ACHIEVEMENTS

I attach for information a copy of an (uncorrected) proof text of the booklet on UK environmental achievements which my Secretary of State undertook to have prepared by the London Economic Summit.

As you will see, the text has already had to go to the printers; and if the booklet is to be ready for the Summit by 7 June, it is too late to change it. But we have incorporated as many as possible of the comments which officials in the Departments with a particular interest made on a draft circulated last week.

I am copying this to the Private Secretaries to all Cabinet Ministers, the Chief Whip, and Sir Robert Armstrong.

Yours,

Andrew

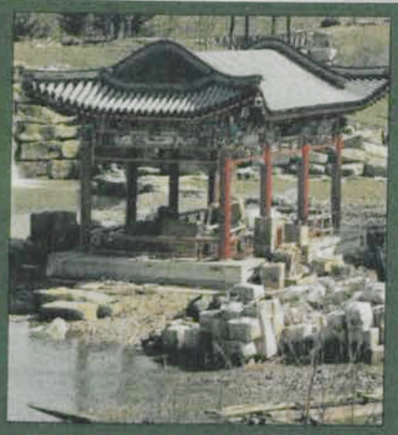
ANDREW ALLBERRY
Private Secretary

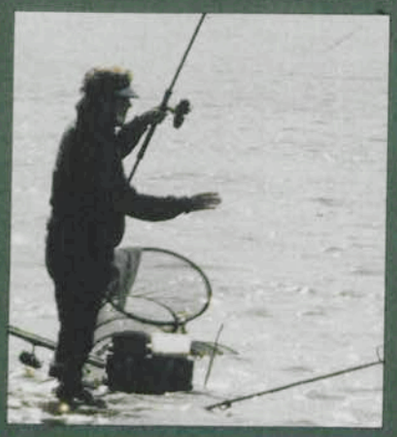
David Barclay Esq

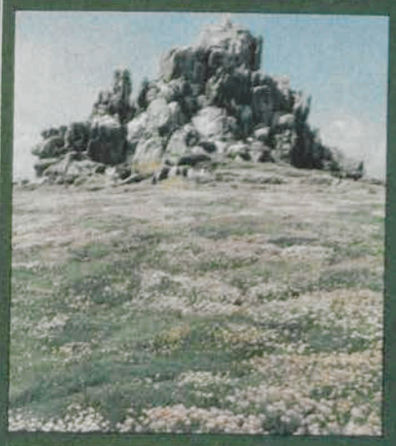
Environmental Protection

Problems, Progress, Practice, Principles and Prospects

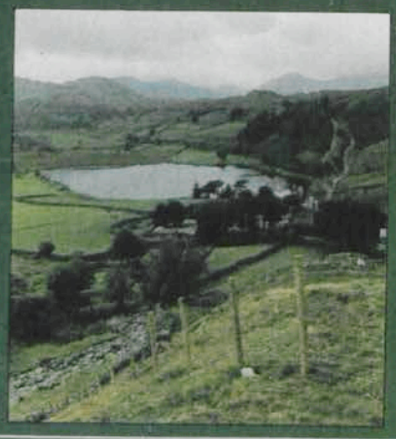
THE DEPARTMENT OF THE ENVIRONMENT








The Rt Hon Patrick Jenkin MP

Message from the Secretary of State for the Environment

We in Britain are sometimes too modest about our achievements. This is certainly true in relation to the improvement of our environment. Indeed, to read our newspapers or watch our television, one might be tempted to believe that things are forever getting worse. In fact, the exact opposite is the case. Things are steadily getting very much better.

So the purpose of this booklet is to set the record straight. It describes the problems we have faced, the way in which we have tackled those problems, and the considerable success we have had.

Of course there is still much to be done. Some of the most worrying problems are international and Britain is determined to play a full part in finding solutions. It is my purpose that we continue to build on the firm foundations described in the pages of this booklet.

Patrick Jenkin

Problems

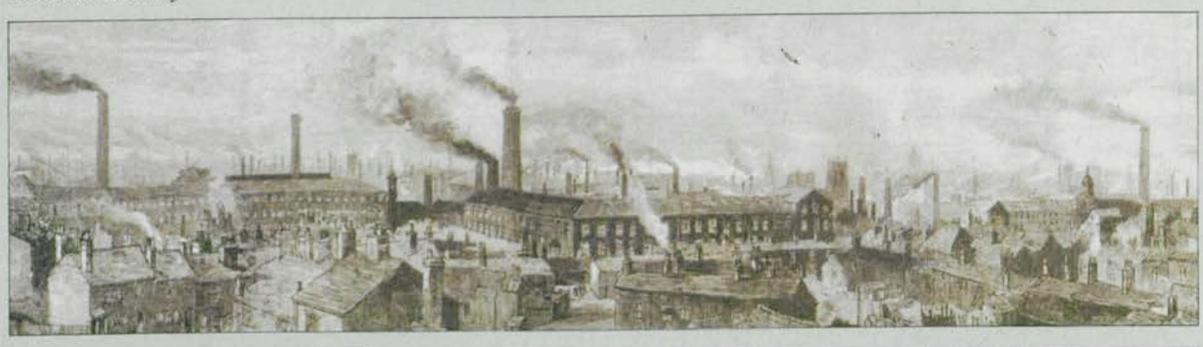
Just over 200 years ago the industrial revolution began - in Britain. Mines were opened and mills and factories were built in thousands to exploit plentiful supplies of coal, water and iron ore and the inventiveness of the new industrialists - men like Watt, Arkwright and Wedgwood. Millions of people eventually came to work in the great urban areas that sprang up. Industry ruled.

Right: The conditions experienced by foundry workers in late Victorian times.

Below centre: Leeds during the nineteenth century.

By the middle of the last century, much of Britain's air was smoky and acrid. Rivers were dying or dead, choked with industrial effluent, domestic sewage, or both. The new industry, and the sheer number of people moving to work in it, had taken their toll. Something had to be done to safeguard public health.

Below: Coalbrookdale during the eighteenth century. Abraham Darby bought the local ironworks in 1708 and discovered how to extract iron using coke instead of charcoal. The foundry was later producing parts for the first iron bridge and the first railway locomotive.



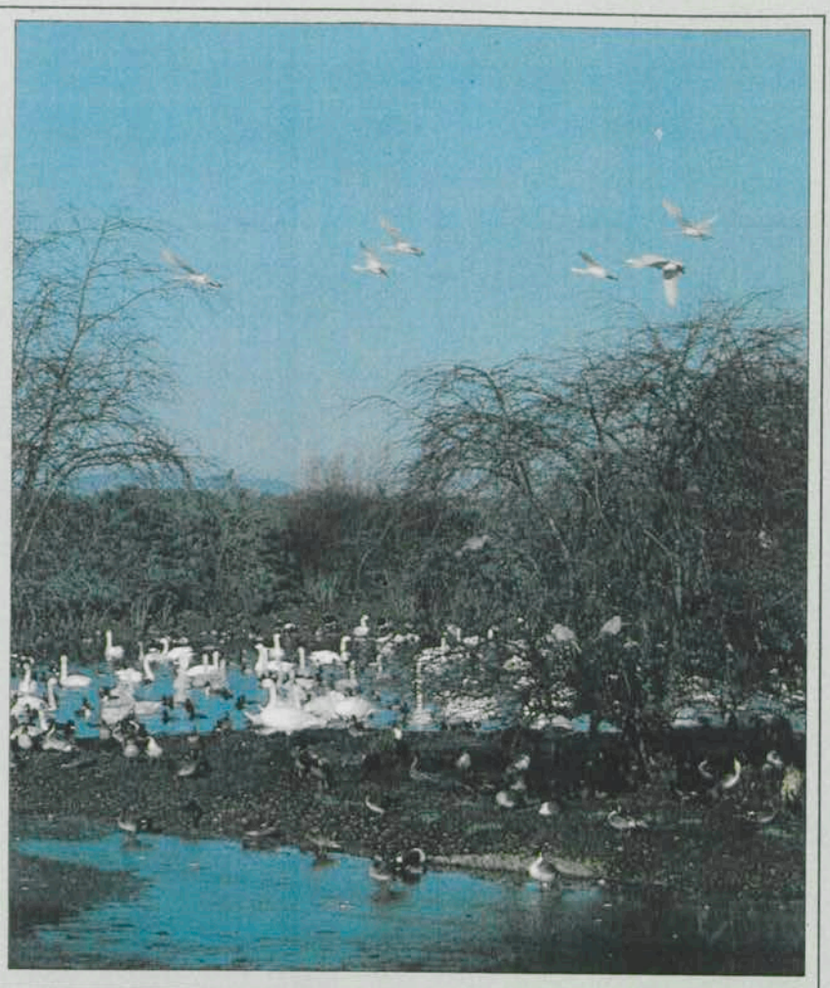
Progress

The Public Health Act of 1848 introduced measures to control freshwater pollution. The Alkali Act of 1863 tackled the worst types of air pollution - beginning with hydrochloric acid gas emissions from the old alkali industry. Environmentalism was born - in Britain.

Over the years since then, steadily increasing efforts have been made to improve the state of our environment - concentrating initially on the safeguarding of public health, but broadening later to include the protection of wildlife habitats and conservation of the countryside.

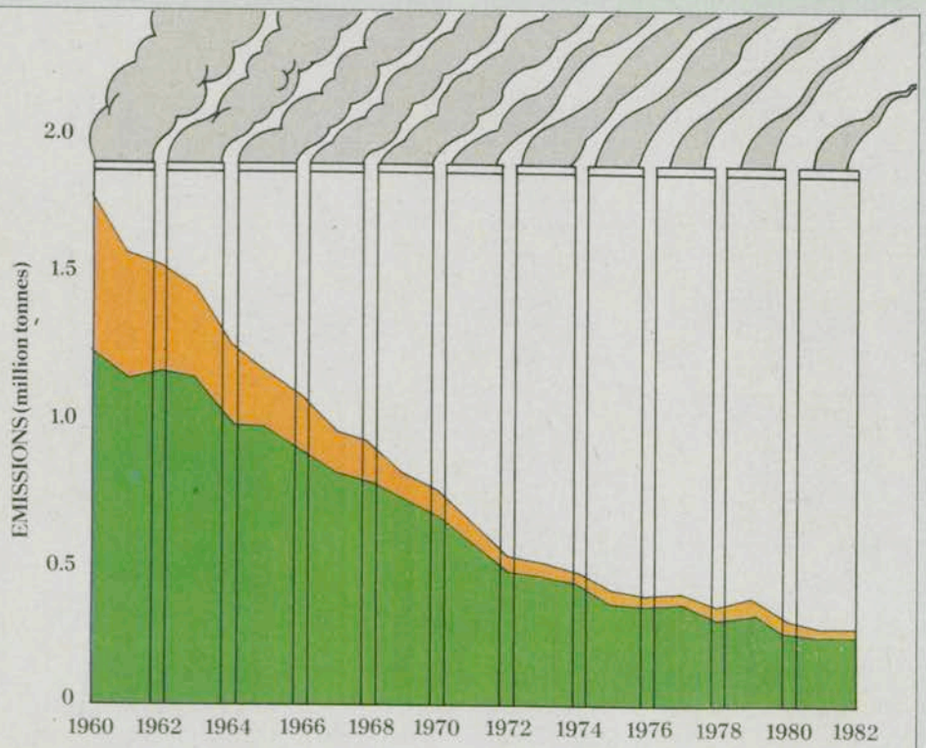
The results are there for all to see.

- Emissions of smoke have fallen by over 85 per cent since 1958 - partly as a result of the Clean Air Acts of 1956-1968, but also as a result of the switch from coal to cleaner, more convenient fuels (such as natural gas).

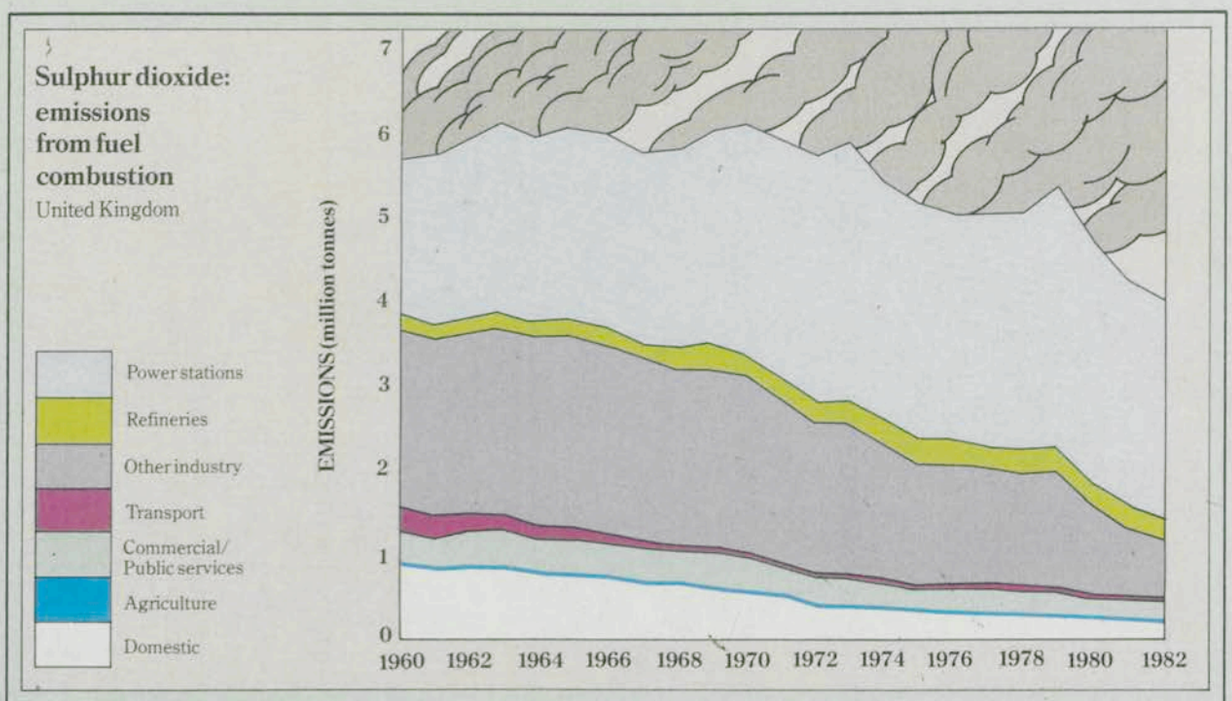


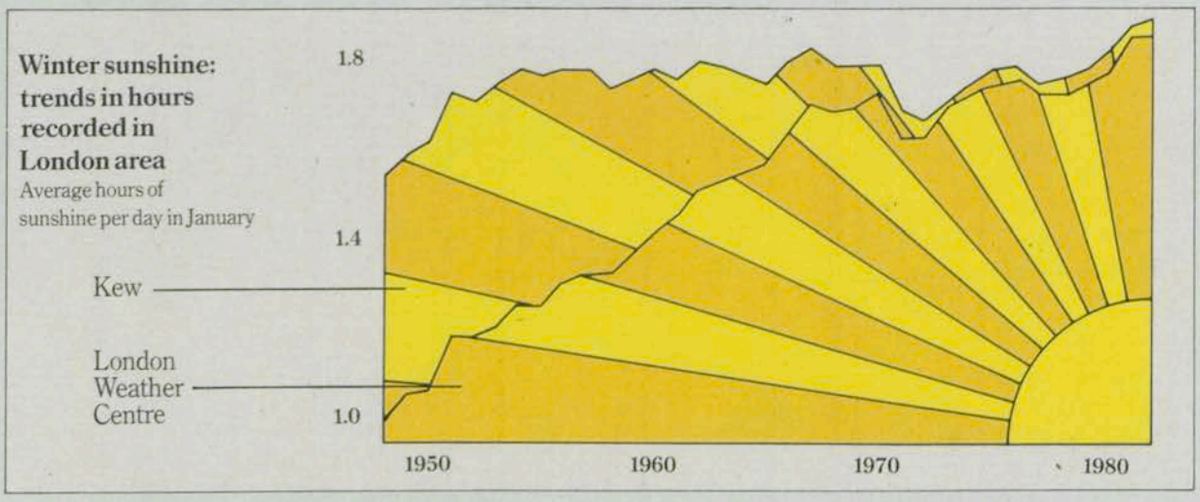
Right: Slimbridge Wildfowl Trust in Gloucestershire.

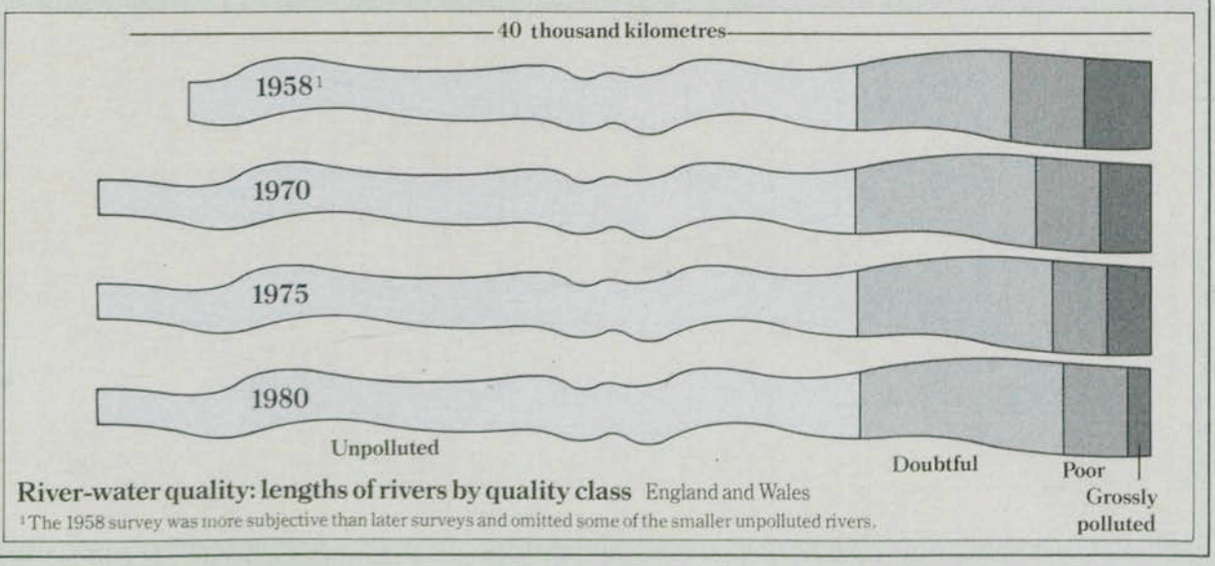
Smoke: emissions from coal combustion
United Kingdom



Progress







River-water quality: lengths of rivers by quality class England and Wales

[1] The 1958 survey was more subjective than later surveys and omitted some of the smaller unpolluted rivers.

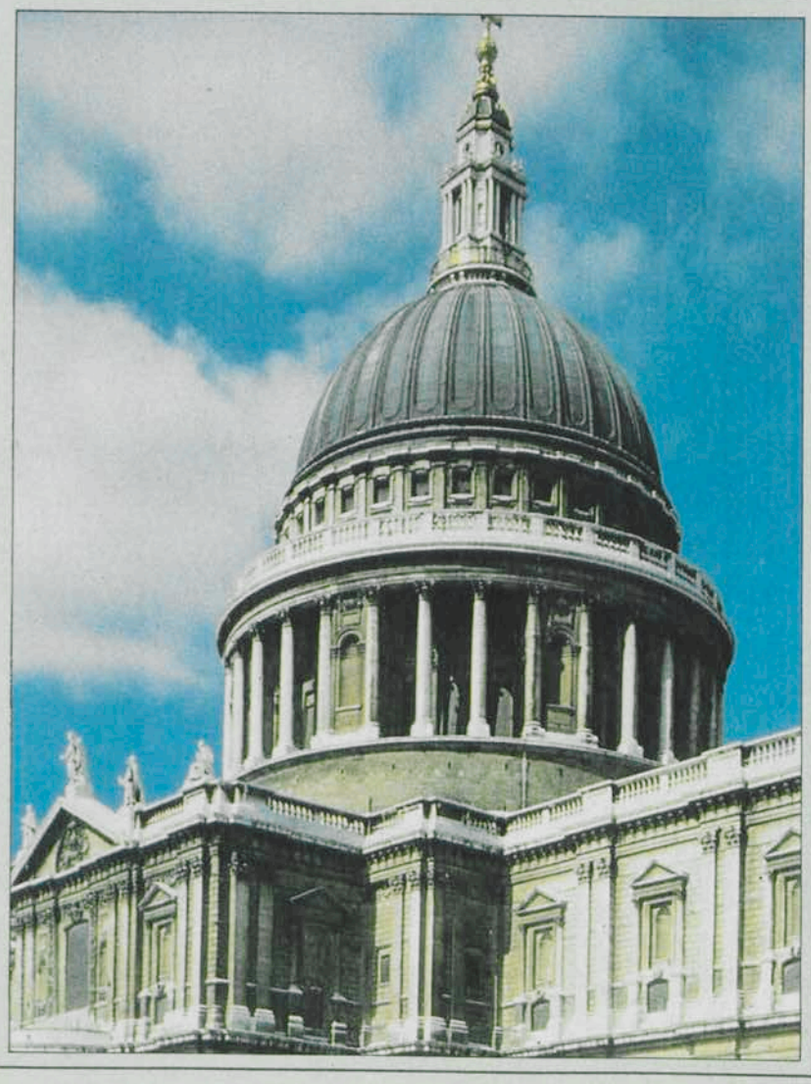
Progress

- Sulphur dioxide emissions have fallen by a third since 1970.
- Cleaner air means more sunshine. The amount of winter sunshine in central London is now almost the same as it is on the outskirts.
- Between 1958 and 1980 the length of tidal and non-tidal rivers and canals in England and Wales classed as grossly polluted fell from 7 per cent to 2½ per cent of the total length of those waterways. The first mature salmon since 1835 was recently caught in the Thames.

Right: London, midday, December 1962. 'Smog' obscures all but the closest objects. People cover their faces with scarves or masks to keep out the chemicals and dirt.

Above: Fishing in the River Thames today is not only a peaceful, but also a productive, pastime.

Right: London, midday, December 1983. Winter sunshine glints on the dome of St. Paul's.



Progress

- In round figures, over the last decade or so 17,000 hectares of derelict land have been reclaimed in England; 6,000 in Scotland; and 3,000 in Wales.
- A number of pesticides with dangerous side-effects (such as DDT) have been or are being phased out. Over the last 20 years there has been a steady decrease in pesticide residues in food.
- Several species of birds which were endangered ten years ago are now increasing dramatically in numbers.

Question – How have these improvements been achieved?

Answer – By a variety of measures tailored to meet particular needs.

Above left: Dereliction – St. Helen's, Lancashire.

Below: Thorpe Water Park near Chertsey, Surrey, was previously a disused gravel pit.

Practice

Above: Scunthorpe ironworks in the 1950s.

Below: A modern factory in Scotland.

Smoke from house chimneys has been reduced by enabling local authorities:

i. to declare smoke control zones within which the emission of smoke from housing is banned;

ii. to help people to pay for the installation of special grates for burning smokeless fuel.

Smoke from lorries, buses and other diesel-engined vehicles has been reduced by setting tighter standards to be met by manufacturers and enforcing better maintenance through annual inspections. Pollution from railway engines has been much reduced by the switch from coal burning to electric and diesel power.

Government chemists and engineers exercise increasingly strict control of noxious emissions from industry.

Below centre: Steam locomotion was picturesque but had its problems.

Below: The high-speed train of the present.

Practice

Discharges to water courses are carefully regulated by the water authorities, which are committed to a progressive improvement in the condition of the waters under their care. A particular discharge to fresh water is allowed only if, taken in conjunction with all other discharges, it will not jeopardise the particular uses to be made of that particular stretch of water. This applies both to direct discharges by industry and to discharges from sewage treatment works (to which most industrial discharges are in fact channelled).

Discharges direct to the sea or to estuaries and sea-dumping of wastes are regulated on the same lines. The sea has a much greater absorptive capacity than fresh water, and we can use this capacity to advantage. But we rely on the sea and the sea-shore for sea-food. Sea-birds and a wide variety of other wildlife depend upon them. They are important for amenity purposes. We cannot, and do not, allow them to be damaged by indiscriminate discharges. So we monitor the effects of existing discharges to sea, and assess the likely effects of proposed discharges with great care before granting any new consents.

Over the last few years we have successfully tapped the North Sea's oil and gas reserves in extremely hostile waters without damage to the environment. This is a great achievement.

Below: A puffin in flight over Flamborough Nature Reserve in North Yorks.

Top: The challenge - sewage effluents polluting a river.

Above: The response - an analytical chemist evaluates samples of river water for dissolved oxygen, ammonia content and pH - all very important parameters for the health of fish and other river organisms. The Thames Water Authority maintains mobile laboratories on launches and sludge vessels.

Principles

Each of the problems required its own solution, and we have therefore adopted a flexible approach - taking each problem as we find it rather than attempting rigid controls across the board. No industrial nation can eliminate waste entirely from its production processes; nor can we clear up every black spot overnight. But by concentrating on the worst problems first and applying sensible control measures in each case taken on its merits, we have restored most of our environment to an acceptable quality.

Our approach is simple. Discharges and emissions of harmful substances must be kept as low as can reasonably be achieved: the more harmful the substance, the tighter the control. Where wastes have to be disposed of, we strongly support the 'best practicable environmental option' - the option which will protect the environment most effectively without excessive cost. In practice, we rarely need to impose standards which are so stringent that to meet them would jeopardise the very viability of the industry on which we depend for our livelihood.

We believe that the pragmatic approach which has served us so well in the past will continue to do so in the future.

But some pollution problems are international in character, and to these an international response is often necessary. Different countries may have similar problems but different methods of dealing with them and different priorities. International negotiations are often protracted and frustrating.
But they are well worthwhile if the end product is a more effective instrument for improving the environment. Britain has helped to develop proposals in a wide range of international groupings in recent years, and we have a number of successful initiatives to our name - leading, for example, to the protection of endangered species, such as the whale.

We shall continue to press, both within the European Community (EC) and more widely in bodies such as the United Nations, for environmental measures which are based on sound science and economical good sense. The more carefully money is spent on each environmental measure, the more improvements will be possible.

Question - But can there be all that many environmental problems left to solve, given the progress that has already been made towards solving them?

Answer - Alas, environmental problems still abound.

Below centre: St Katherine's Dock in the heart of London has been transformed from an industrial eyesore into an attractive and functional area.

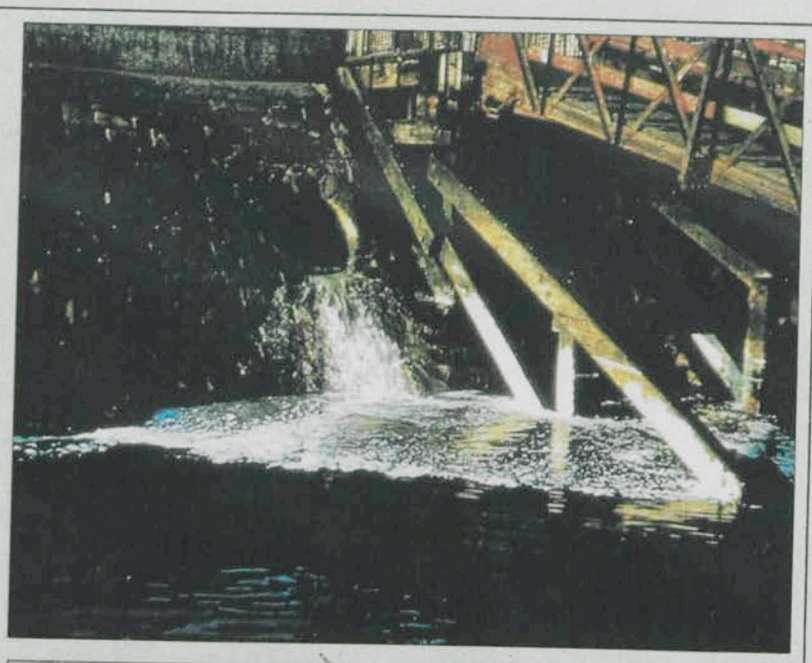
Below: This 70-tonne machine is a powerful aid in disposing of 15 million cubic metres of waste material from coal mines in the Barnsley area of Yorkshire.

Prospects

There is widespread international concern about 'acid rain' (more properly, 'acid deposition' because there are dry forms) and the effects it may have on forests, rivers and lakes. In Britain, about £4 million will be spent in 1984/5 on research to help determine precisely how acid deposition affects the environment. We are also playing a full part in following up the United Nations Economic Commission for Europe Convention on Long Range Transboundary Air Pollution.

On a European scale, an EC scheme is in place to ensure that industry and government have enough information on chemicals before they are marketed on a significant scale to ensure that their potential health and environmental effects can be assessed. The need for this kind of precautionary approach is illustrated by the fact that there are no fewer than 129 items on an EC list of existing substances which require investigation to decide the level of control needed to ensure that releases to water do not cause irreparable damage.

At home, some of our estuaries, particularly those whose rivers and banks are the sites of older industries and of large centres of population, are nowadays categorised as grossly polluted and need to be cleaned up. The cost can run into thousands of millions of pounds; and it is only recently that we have been able to make a start on some. In particular, the Mersey Estuary, the rivers in its catchment, and their general surroundings are to be cleaned up. But the effort and cost are high and it is a task for a generation.



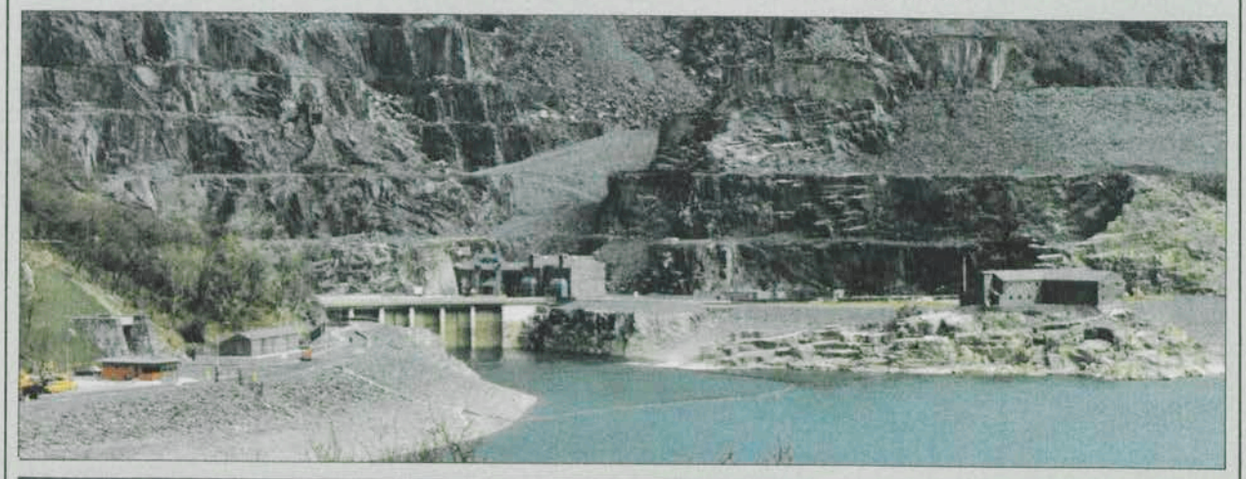
Top: Sewage being discharged into the River Tyne, Newcastle.

Above: Marine biologists analyse the day's catch collected from the circulating water screens of the Thurrock Power Station. The once heavily polluted Thames has been cleaned to such an extent that 98 species of fish have been recorded in water which, as recently as 1960 supported only eels.

Prospects

There are still a handful of older industrial plants whose air pollution record also leaves much to be desired: although their emissions are not having any detectable effect on human health or causing appreciable harm to the environment in general, they are dispiriting and an eyesore. Acceptable solutions need to be found without jeopardising the livelihood of communities dependent upon the works for employment.

Left: A typical old industrial valley in South Wales.



Middle: The Dinorwic pumped water scheme - built entirely inside a slate mountain in North Wales - has the fastest response of any comparable scheme in the world, being able to contribute 1,320MW of its total 1,880MW output to the national grid within ten seconds of demand. Buildings have been kept to a minimum on the surface to ensure that the area of outstanding natural beauty is not impaired.

Left: The Drax Power Station complex near Selby in Yorkshire. A glasshouse complex has been built that uses excess heat from the power station cooling water for the production of horticultural crops. In addition, the pulverised ash from the station is being used to build a landscaped hill which will screen the complex from public view.

Prospects

Waste tips can contain substances which may be harmful and, if the tips are not properly planned and managed, may leach into water-courses. Even though their contents are harmless, quite a few tips have caught fire - causing smoke, smells and subsidence. Waste disposal needs to be carefully controlled. A comprehensive new system has been introduced in recent years to ensure that this happens.

There are also other problems with land. In particular land previously used for industrial purposes or for waste disposal requires special care as it is brought back into beneficial use. The need for this was recognised early in Britain.

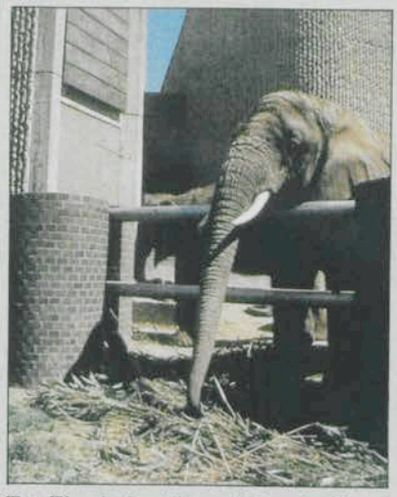
Building on land which is chemically contaminated will always need special attention if people's health and the fabric of the buildings are to be properly protected. Government advice on this has been available for some time and is being continually updated in the light of experience and new knowledge.

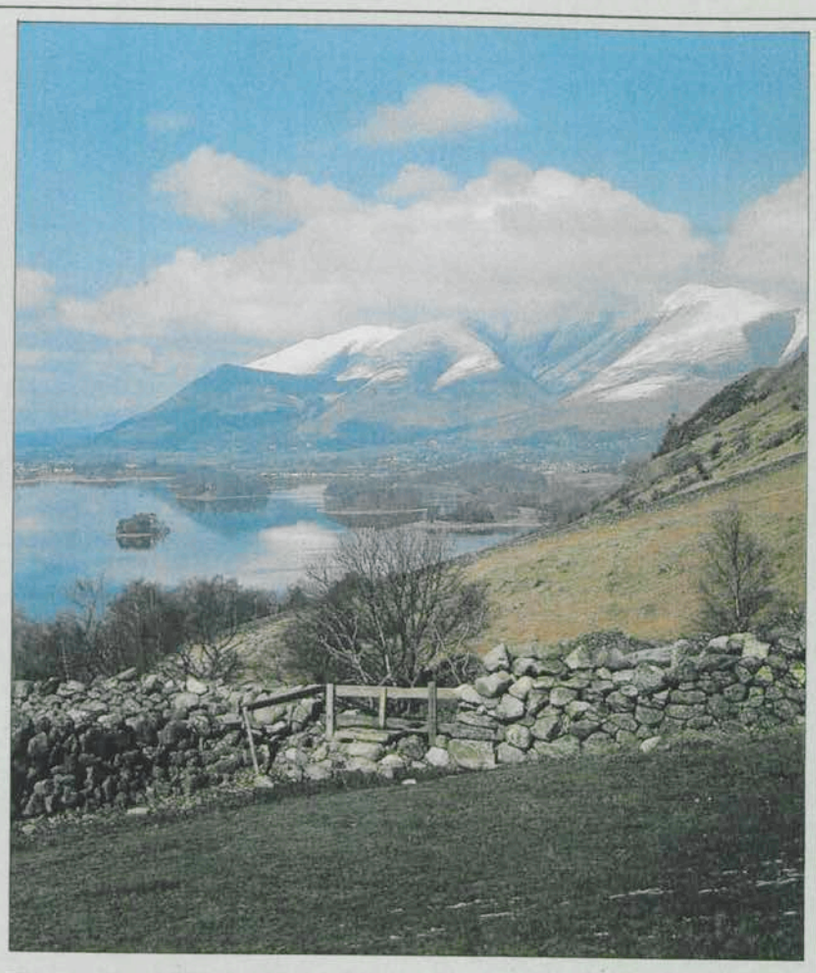
There is also derelict land to contend with: some 34,000 hectares in England and 13,000 in Wales currently justify reclamation (there has been no recent survey in Scotland). The transformation of 100 hectares of derelict dock area in Liverpool into the site of an international garden festival in under 2½ years is a dramatic example of what can be done. Last year local authorities in England were invited to spend up to £75 million on reclaiming derelict land - most of it reimbursed through Government grant-aid; and in Scotland and Wales the Scottish and Welsh Development Agencies spent £23 million and £11 million respectively. The programme is to continue.

Top: The Lea Valley, once an industrial wasteland, has since been landscaped and transformed.

Below: Liverpool - the 1984 International Garden Festival. Intensive work has transformed a derelict waterfront into the largest horticultural event of the year.

Prospects





Top: The elephant house in London Zoo.

Right: Derwentwater in the Lake District.

Bottom: The golden eagle - once threatened with extinction in this country.

There is widespread concern about the protection of the countryside. A major step forward came in 1981 with the passing of the Wildlife and Countryside Act.

Funds are now being provided for management agreements with owners and occupiers to safeguard areas of special landscape and wildlife interest.

So far six Nature Conservation Orders have been made, giving special protection to important wildlife sites. More generally, Government-sponsored advice is now widely available to farmers and landowners on how best to integrate effective wildlife and landscape conservation and successful farming.

We are also doing our best to protect wildlife species, both at home and elsewhere. In association with other EC countries we have banned the import of whale and certain seal pup products; we have introduced a system of licensing zoos to ensure that captive animals are not kept in unsuitable conditions; and new controls are in place to protect wild birds and to make it more difficult to take them or their eggs from the wild.

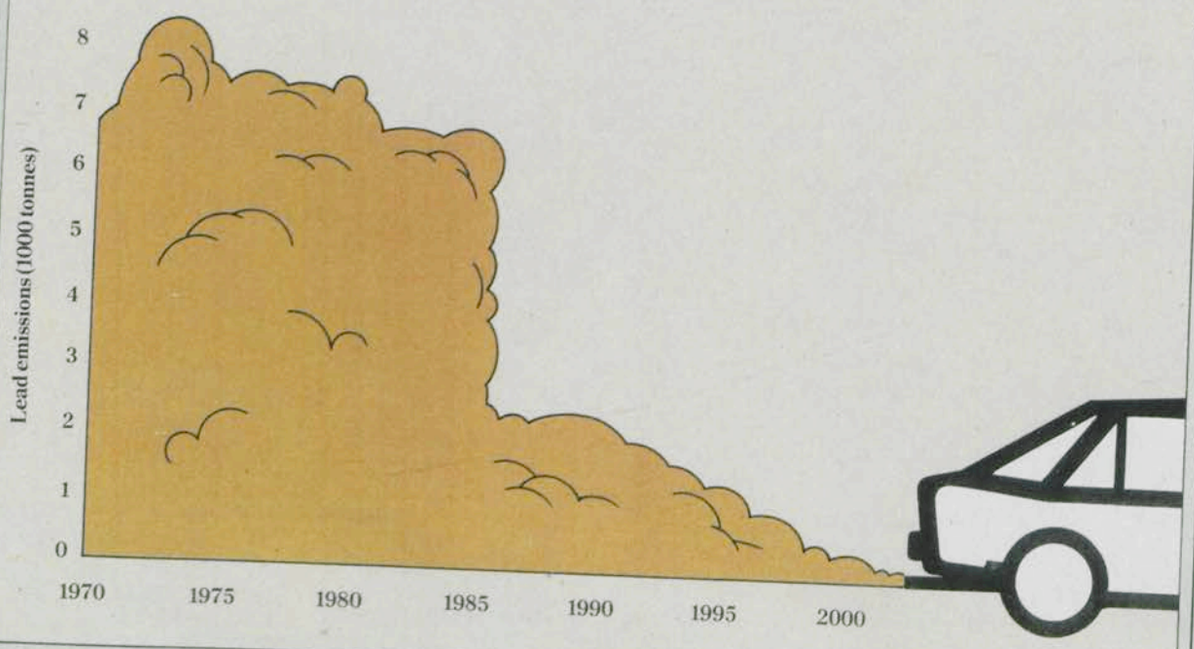
Prospects

In addition:

- the problem of lead in the environment is being tackled more vigorously than ever before. It is steadily being phased out of food-can solders, and petrol-lead levels will be down by two-thirds by the end of 1985. By 1990 at the latest, we aim to start phasing out leaded petrol. Also by 1990, we shall have completed a nation-wide programme to treat water supplies so as to minimise their tendency to dissolve or carry lead;
- lead is the best known example of a substance where a broad approach to reducing exposure has been adopted. But some other substances - for example, asbestos - have raised sufficient concern in recent years to justify a similar broad approach. They, like lead, are characterised by a real and perceived hazard and properties which make them extremely persistent once released into the environment. Other examples of difficult substances are the 'heavy metals' mercury and cadmium, and polychlorinated biphenyls (PCBs). Our intention is that in each case, the people most at risk should be identified, the risk should be assessed, and any action necessary should be taken. The aim for the future is to 'manage' such substances so as to reduce exposure to them to the minimum practicable;

Above: Heavy traffic around Parliament Square in London.

Total UK lead emissions from vehicles
achieved and planned (despite increasing car mileage).



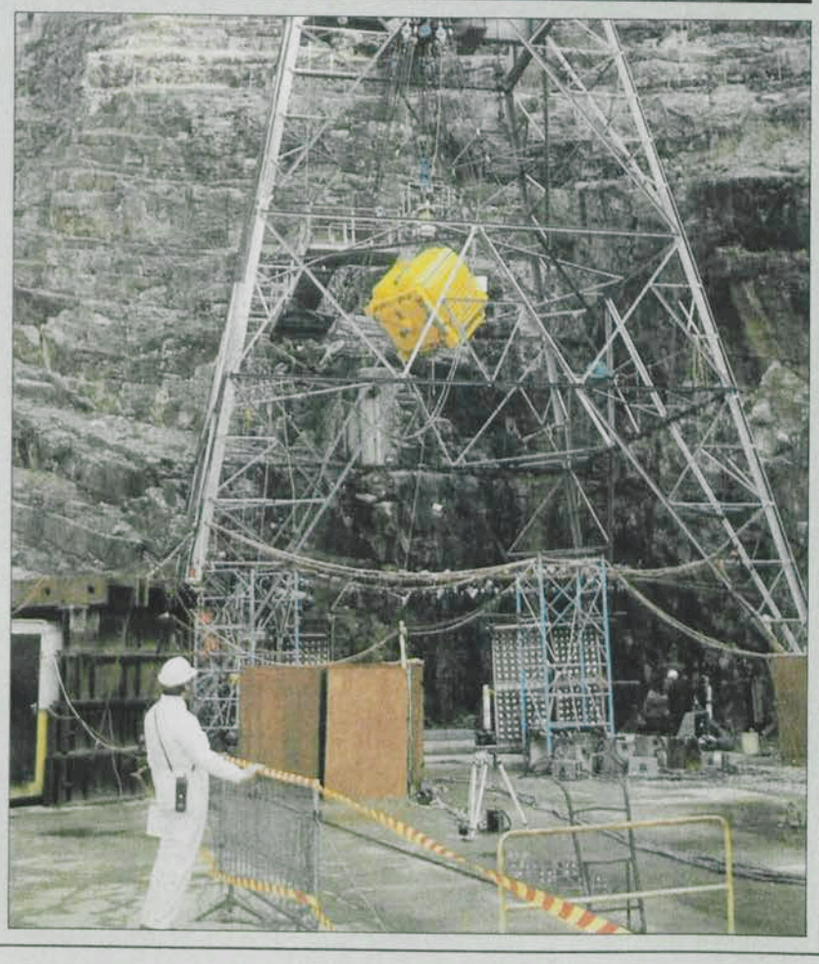
Prospects

- the main discharges of radioactive waste, which are from the Sellafield reprocessing plant, have been cut in recent years. There will be another big reduction in 1985 - beta/gamma radiation to 10 per cent of the level in the early 1980s, and alpha radiation to 20 per cent of that level; and further reductions are planned. Plans are being worked up for the development of land sites for depositories for low and intermediate level wastes;
- vehicle emissions are being progressively reduced. In 1986 the levels are due to be reduced to the lowest ever, with good prospects of further reductions resulting from advanced engine design;
- more stringent model by-laws have been introduced to deter irresponsible straw burning. The farmers' code of practice has been brought into line with these by-laws;
- water sources and water supplies are being carefully monitored to ensure that levels of nitrate are kept within acceptable limits;
- where sewage contaminates bathing waters which have been designated under the relevant EC Directive, substantial capital schemes are being undertaken to achieve conformity with the Directive's standards;

Top: Sellafield reprocessing plant.

Right: A 48-tonne nuclear fuel flask dropped under experimental conditions to test its strength survives intact.

Below: Stubble burning.

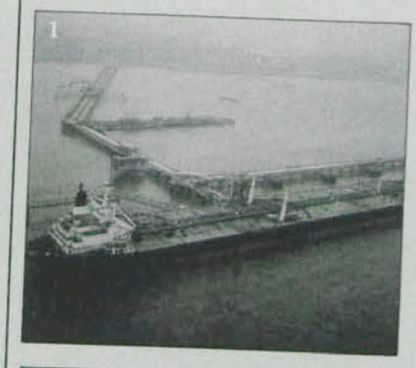


Prospects

- a new Hazardous Waste Inspectorate has been set up to help local authorities to improve their control of waste management and to work towards consistent and environmentally acceptable standards in this field;
- special, comprehensive Government advice is available on the handling of hazardous wastes;
- we encourage recycling of materials whenever this is economic, and in particular have given strong financial and technical support to the development of full-scale plants for the production of fuel derived from waste;
- the UK Pollution Abatement Technology Award Scheme has just completed a very successful first year. The quality of the entry showed that ingenuity and innovation are very much alive in Britain, and the scheme will be repeated annually in future;
- to supplement existing material, comprehensive Government advice on the redevelopment of contaminated land is being prepared;
- Government-backed research and development to produce quieter heavy lorries is continuing so as to enable manufacturers to meet much tighter European standards that will come in at the end of this decade. Regulations banning excessively noisy motorcycle exhausts have just been made. Aeroplanes are getting progressively quieter. Everything practicable is being done to give us more peace and quiet.

In September 1983, the Sivand *collided with a jetty in the Humber (1), spilling 6,000 tonnes of crude oil (2). Prompt action by the Government's Marine Pollution Control Unit (3) ensured that the oil was cleared quickly, with no apparent long-term damage to the environment (4).*

Photographs provided by ITOPF



Dartmoor National Park

Postscript

To help us to respond effectively to problems old and new we are fortunate in having in recent years had a standing Royal Commission on Environmental Pollution. Their periodic reports on the environment as a whole or significant aspects of it have been and will remain invaluable as a check on the past and a guide to the future.

Britain has a good record on environmental issues. But there are always new challenges and new problems. This pamphlet shows that we do not intend to rest on our laurels. Protecting the environment is a continuous process, which we intend to maintain.

Prepared for the Department of the
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SUBJECT EC Master file DSS ECDP

10 DOWNING STREET

From the Private Secretary

MR. HATFIELD

CABINET OFFICE

ACID RAIN

A presentation was held at Chequers on Sunday 27 May on the subject of acid rain. A record of the proceedings will be circulated shortly.

You should, however, know immediately that the Prime Minister asked for a defensive brief to be prepared for her use at the Economic Summit, when the subject may well be raised by Chancellor Kohl.

This brief, which will need to be prepared in consultation with those scientists who took part in the presentation, should cover the following ground:

(i) contain a concise statement of the UK's record in reducing emissions of SO_2;

(ii) enable the Prime Minister to counter two assertions -

(a) that UK emissions are a major contributor to levels of SO_2 and NO_x in central Europe;

(b) that there is a direct causal link between acid deposition and forest damage. (Reference could be made here to the German Government's paper for the Munich Conference);

(iii) confirm our willingness to take cost-effective measures to combat air pollution (e.g. our proposals in the Community on lead in petrol, and on lean-burn engines); and to contribute actively to research in this field (e.g. Royal Society and CEGB programmes);

(iv) make clear that although we are open to every new opportunity, we regard the costs of the draft EEC directive as prohibitive (CEGB estimates should be included). We believe it would be wrong to make a commitment in advance to any specific target reduction in SO_2 levels by any specific date.

/ Could

ECL

Could this brief please reach us on the same timetable as the other material being prepared for the Summit?

I am sending copies of this minute to Peter Ricketts (Foreign and Commonwealth Office), Michael Reidy (Department of Energy), John Ballard (Department of the Environment), Dinah Nichols (Department of Transport), John Gieve (Chief Secretary's Office, HM Treasury), Neil McMillan (Kenneth Baker's Office, Department of Trade and Industry) and Robin Nicholson (Cabinet Office).

DM Barclay

29 May 1984

Sources of Emissions

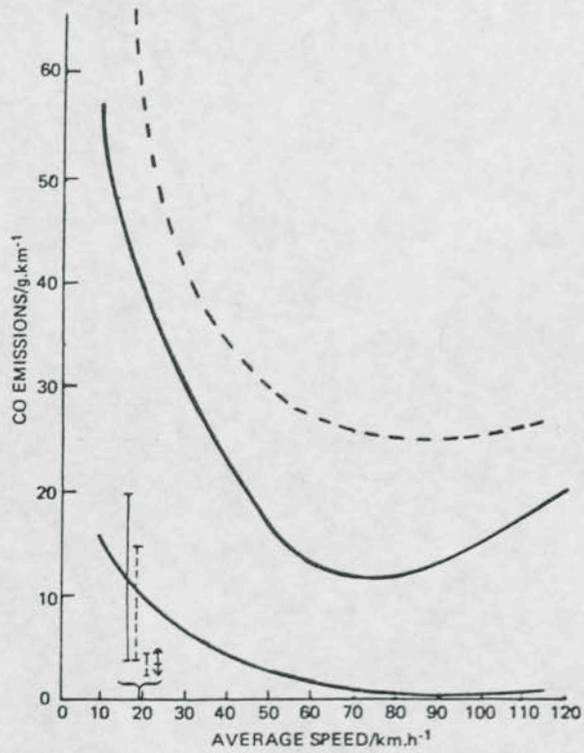
Sulphur Dioxide SO_2	65% Power Stations 19% Industry	Acid
Nitrogen Oxides NOX	46% Power Stations 34% Vehicles	Acid
Hydrocarbons THC	Vehicles	Ozone Smog

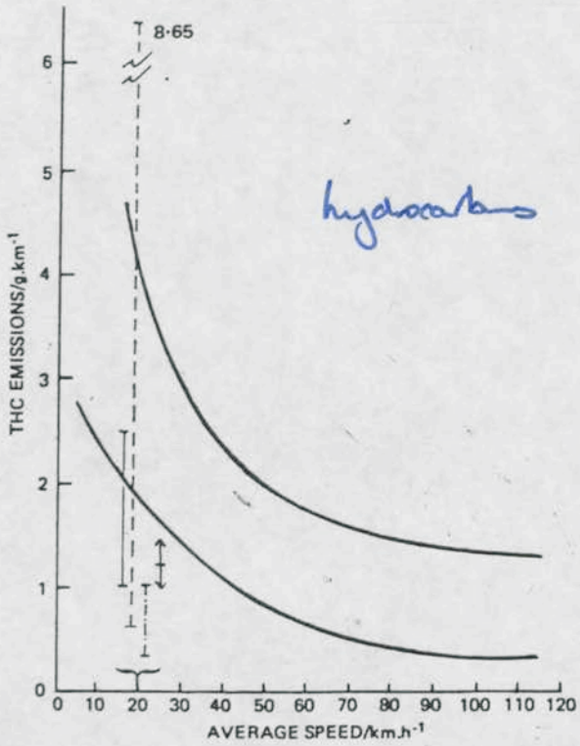
Abatement Methods

Prevention at source

Removal at or near source

Counter ecological effect





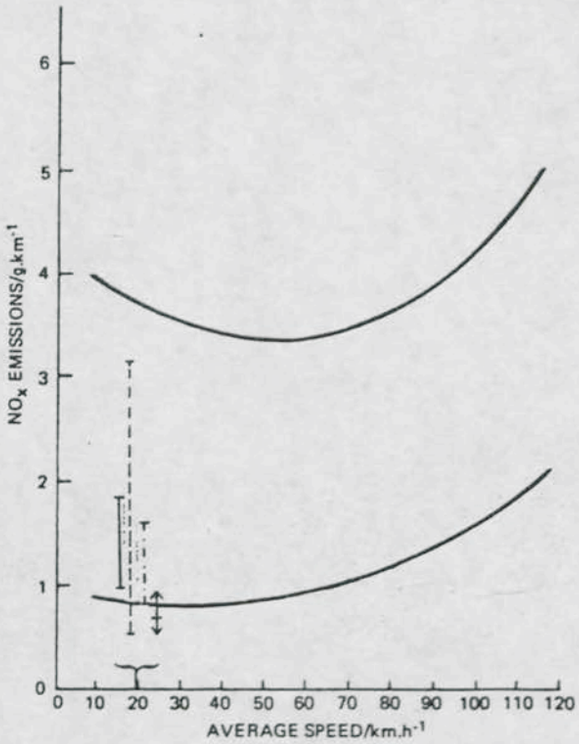


Figure 8

Emission estimates for technology systems meeting arbitrary criteria for emissions and costs. ref. (20).

	system 4p	Improved Conventional
+£100 − Fuel	system 15/16	Lean Burn
+£200 + Fuel	system 23	Improved Conventional + Oxidation Catalyst
+£600 + Fuel	system 29	Improved Conventional + 3-way Catalyst

W.0387

25 May 1984

PRIME MINISTER

Presentation on Acid Deposition - Chequers 27 May 12.00

Background

You have had two meetings with colleagues on policy for environmental protection which have covered a number of problems but especially acid deposition, radioactive waste, secrecy of environmental protection data and compensation for conservation areas.

2. Policy decisions will need to be made (as was the case for lead in petrol) by forming a judgement on the balance of scientific evidence, the size of the environmental problem, the availability of abatement measures and their cost-effectiveness. This presentation will provide the scientific and technological background to emissions from power stations and vehicles which are believed to be associated with acid deposition. The consequential ecological problems include the death of fish, especially in Scandinavian lakes, and die-back of trees especially in German forests.

3. The UK is a signatory of the 1979 Geneva Convention on Long-Range Transboundary Air Pollution which requires countries to draw up policies and strategies to combat emission of atmospheric pollutants. At the Stuttgart Summit in 1983, EC countries agreed to 'take action' to combat acid rain problems. The EC has since produced a draft directive, the large plant directive, which would require reductions in emissions from large plants by 60 per cent for SO_2 and 40 per cent for NOX by 1995 from 1980 levels. The draft is based on

an EC cost/benefit analysis of a variety of problems allegedly caused by acid rain but the analysis has been widely criticised. As a possible alternative to the EC draft directive, twelve countries have formed a '30% club' which pledges reductions of 30% in acid emissions in the same time period.

Handling

4. Attendance at the meeting is shown in Annex 1 and the programme I have arranged is in Annex 2. I suggest you call on me to introduce the programme and I will then also do the links between each of the presentations. I have asked each of the presenters to speak for 10 minutes - my 10 minutes is split between the first and last items.

5. I will suggest that questions during the presentations are confined to points of clarification and that general discussion takes place at the end - I suggest this because the presentations are so inter-related that premature discussion would suffer from the lack of information due to be given in subsequent presentations.

6. I will state that the presentations have been designed to meet two objectives:

(a) To present the scientific evidence on acid deposition to enable you and your colleagues to form a judgement on the present balance of the evidence

(b) To present the state of the art and possible future developments on abatement technologies so that the cost-effectiveness of these may be judged against the nature and urgency of the threat.

7. With allowance for some questions, the presentations should be complete by around 1 o'clock allowing about half an hour for general discussion before lunch. During this discussion, which will be generated primarily by questions from you and your colleagues, it is probable that the members of the presenting

team whose knowledge ranges very widely over this subject will wish to make comments which are not confined to the areas covered by their presentations. Not surprisingly there will be some disagreement amongst the presenters on the weight to be attached to various pieces of evidence.

8. The discussion may tend to veer towards policy-making, in particular Sir Walter Marshall may wish to take advantage of the occasion to present the CEGB view. I advise that, at least initially, you keep the discussion on science and technology because this will be the only opportunity for you to question the experts and you have, of course, a policy discussion scheduled for 19 June.

9. I imagine that the discussion may continue in small groups over lunch and you may want to have a further general discussion over coffee before concluding the occasion.

Conclusions

10. There will be no need for decisions, of course, and you will just want to end by thanking the presenters for their work and your colleagues for joining you.

11. My guess is that the impression left will be as follows:

(a) Acidification of lakes and streams: problem fairly well understood, local treatment by lime neutralisation of the acidity fairly effective, long-term solution is reduction of SO_2 and NOX from power stations and vehicles.

(b) Abatement of acid emissions at power stations: flue gas desulphurisation is effective but expensive, other technologies are being well researched in the current CEGB/NCB research programmes and will be more cost-effective.

(c) Forest die-back: problem complex and poorly understood, no clear sign of effective local measures, real danger of very expensive, ineffective panic measures being sought. Vehicle emissions are the most likely major cause.

(d) Control of vehicle emissions: "3-way catalysts"* are theoretically attractive but service performance is dubious and large expense certain. Lean-burn engines will probably have some effect, are neutral in cost terms and are sound vehicle technology. If further research identifies ozone (and hence hydrocarbon emissions) as a real source of forest die-back, lean-burn engines plus an oxidation catalyst* (much less expensive than a 3-way catalyst) is the probable answer.

* 3-way catalysts control CO, NOX and hydrocarbons, oxidation catalysts control hydrocarbons only.

RBN.

ROBIN B NICHOLSON
Chief Scientific Adviser

Cabinet Office
25 May 1984

Annex 1

Attendance

The Prime Minister	
Mr Patrick Jenkin	Secretary of State, Department of the Environment
Mr William Waldegrave	Parliamentary Under Secretary of State, Department of the Environment
Mr Kenneth Baker	Minister of State, Department of Trade and Industry
Lord Avon	Parliamentary Under Secretary of State, Department of Energy
~~[Mr John Moore~~	~~Financial Secretary, Treasury~~]
Sir John Mason	Formerly Director General, Meteorological Office
Sir Hermann Bondi	Chairman Natural Environment Research Council
Dr Peter Chester	Director, CEGB Central Electricity Research Laboratories
Dr Martin Holdgate	Chief Scientist, Department of the Environment
Dr Robin Nicholson	Chief Scientific Adviser, Cabinet Office
Sir Walter Marshall	Chairman Central Electricity Generating Board
Mr David Pascall	Prime Minister's Policy Unit
Mr David Barclay	Prime Minister's Private Office

Annex 2

PROGRAMME FOR SUNDAY, 27 MAY 12.00 MIDDAY, CHEQUERS

Emissions from combustion plants and vehicles and their relation to acidified lakes and die-back of trees

Presenters:	Sir John Mason, FRS	formerly Director General, Meteorological Office
	Sir Hermann Bondi, FRS	Chairman, Natural Environment Research Council
	Dr P F Chester	Director, Central Electricity Research Laboratories, CEGB
	Dr M W Holdgate, CB	Chief Scientist, Department of the Environment
	Dr R B Nicholson, FEng, FRS	Chief Scientific Adviser, Cabinet Office

Presentation: 12.00 - 12.50

1.	Sources of emissions	Nicholson
2.	Chemical changes in the atmosphere	Mason
3.	Effect of acid deposition on lakes and streams	Bondi
4.	Effect of atmospheric chemicals on forests	Holdgate
5.	Abatement technologies for power stations	Chester
6.	Abatement technologies for vehicles	Nicholson

? DTI — ? Trippier
? Tony Newton

pa
DMB
24/5

PRIME MINISTER

Presentation on Acid Rain

I have been exploring dates for a technical presentation on acid rain. Assuming that you would like to fit this in before the Economic Summit, the only days that you could also offer lunch to the participants are over the Whitsun weekend at Chequers.

The following could come on Sunday 27 May:

- The Secretary of State for the Environment
- Mr. Waldegrave
- ~~The Chief Secretary~~
- Dr. Nicholson
- Mr Kenneth Baker
- Lord Avon
- Sir John Mason
- Dr. Peter Chester (CEGB)
- Dr. Martin Holdgate (Chief Scientist, DOE)
- Sir Herman Bondi (or another NERC scientist)
- Sir Walter Marshall

Although he would be willing to change his arrangements if necessary, the date would cause some personal inconvenience for Mr. Walker. He could, if you agree, be invited to send a junior Minister from his Department.

Agree to proceed with a presentation at 1200 on 27 May at Chequers?

Agree the above guest list, plus Mr. Walker or a junior Energy Minister?

What about Sir Walter Marshall.

Can he not come?

MT

DMB

18 May 1984

Environmental Affairs

Le rc

MRS PLATMAN
QUESTIONS

c. Dr. Nicholson
Mr. Ingham.

Parliamentary Answer on Acid Rain

The Prime Minister has decided that she would like to place on record the attached statement on acid rain.

Could you please arrange for the question to be tabled, and for the answer to issue as soon as possible.

David Barclay

18 May 1984

DMB 22/5

David
PQ being answered today.
Copy attached at back.
Charlotte 22/5

SM

Mr. Barclay.

No objection.

A. J. C. 19/5.

PRIME MINISTER

You will recall the suggestion at your meeting on the Science Budget that you might make a Statement by way of Parliamentary Answer on the UK's record on acid rain.

I attach a possible draft Question and Answer, prepared by Dr. Nicholson in consultation with the Department of the Environment.

It might be better to defer consideration of a Statement until after a decision has been taken on the Foreign Secretary's proposals for a Summit initiative on environmental pollution.

Agree to wait until then?

I think we could go ahead before that mt.

DMB

11 May 1984

Q: To ask the Prime Minister whether in view of recent criticism she will make a statement on the UK's record on acid rain.

A: The relationship between emissions from power stations and other combustion plants and environmental damage attributed to acid rain is uncertain. ~~For example~~, Scientific evidence now suggests that vehicle emissions and ozone play an important part in the process leading to forest damage.

The Government therefore believes that it is important to develop a better understanding of the scientific basis of what is more correctly termed acid deposition so that cost-effective action can be taken to prevent damage to the environment. For this reason, the CEGB and the NCB have funded a major international study under the auspices of the Royal Society, in collaboration with equivalent learned societies in Norway and Sweden, costing £5m over 5 years.

Even as this research continues, the trend of emissions is strongly down in the UK. Since 1970 there has been a 34 per cent reduction in sulphur dioxide emissions, and whereas in 1950 25 per cent of such emissions in Europe* came from the UK, now the figure is 11 per cent. I therefore do not accept criticism which singles out the UK for blame.

* Excludes USSR

Background Note

The phenomenon known as acid rain, but referred to more accurately as acid deposition (acid mist and dry deposition of particulates are also significant) has become a major environmental issue in Scandinavia (where it is blamed for reductions in fish populations in rivers and lakes) and West Germany (which has become alarmed at the deterioration in its forests). The UK is often singled out for special blame. This is because it emits relatively large amounts of sulphur dioxide and nitrogen oxides from its largely coal-fired power stations and it is argued that the prevailing winds carry these primary pollutants which are then converted into the secondary pollutants - sulphuric acid, nitrogen dioxide and nitric acid - and deposited in Continental Europe, particularly Scandinavia, as acid rain.

Yet the atmospheric chemistry underlying this process, and indeed the local processes whereby acid deposition is implicated in environmental damage are far from clear and are extremely complex. Scientists generally accept there is a relationship between increased acidity in fresh water and the decline of fish stocks, but even here, knowledge is imperfect and there are several intervening variables. Furthermore, there are sources of environmental acidity other than acid rain, and the relative contributions of these various sources is not established. For this reason, the CEGB and the NCB have funded a major international study under the auspices of the Royal Society, in collaboration with equivalent learned societies in Norway and Sweden, costing £5m over 5 years.

In connection with forest damage in Central and Western Europe, it is becoming clear that local pollutants and local conditions are crucial, with vehicle emissions significant as a source of nitrogen oxides and hydrocarbons. It is possible that ozone, formed during photochemical reactions involving nitrogen oxides and hydrocarbons is more directly implicated in forest damage than acid deposition as such. This is especially the case in hot, dry summers as most of Europe has had in the late 70s and early 80s.

/ The UK

The UK is most vulnerable to criticism on the grounds that it has shown reluctance to act to curb power station emissions by retrofit programmes, rather than that it is the major source of pollutants in Europe. The decline in overall UK emissions has been achieved by other industrial plants switching to low sulphur gas and oil but power stations are now correspondingly more significant as sources of sulphur and nitrogen oxides. But the UK has argued that, without understanding the science, there is a risk of undertaking expensive and ineffective remedial action on power stations.

In comparative emissions, the UK is far from the worst offender in Europe. Six other countries export more sulphur emissions than the UK (Italy, FRG, GDR, Poland, Czechoslavakia and Yugoslavia) although UK total emissions are about the same as Italy, West and East Germany, and Poland (see table below).

Monthly sulphur emissions, and exports to other countries

	Total emissions (tonnes)	Emissions to other countries (tonnes)
Czechoslovakia	116,100	70,600
France	145,400	58,000
Germany, East	172,200	109,500
Germany, West	165,400	91,800
Hungary	70,100	46,300
Italy	167,200	119,100
Poland	173,500	90,200
Spain	69,100	17,400
USSR	379,000	20,400
UK	173,000	64,100
Yugoslavia	141,500	69,300

Source: ~~OECD~~ UNECE

Tuesday 22 May 1984

(Answered by the Prime Minister on Tuesday 22 May 1984)

UNSTARRED No. 147 Mr Tom Sackville: To ask the Prime Minister, whether in view of recent criticism she will make a statement on the UK's record on acid rain.

The relationship between emissions from power stations and other combustion plants and environmental damage attributed to acid rain is uncertain. Scientific evidence now suggests that vehicle emissions and ozone play an important part in the process leading to forest damage.

The Government therefore believes that it is important to develop a better understanding of the scientific basis of what is more correctly termed acid deposition so that cost-effective action can be taken to prevent damage to the environment. For this reason, the CEGB and the NCB have funded a major international study under the auspices of the Royal Society, in collaboration with equivalent learned societies in Norway and Sweden, costing £5m over 5 years.

Even as this research continues, the trend of emissions is strongly down in the UK. Since 1970 there has been a 34 per cent reduction in sulphur dioxide emissions, and whereas in 1950 25 per cent of such emissions in Europe* came from the UK, now the figure is 11 per cent. I therefore do not accept criticism which singles out the UK for blame.

* Excludes USSR

MASTER

cc Environmental Affairs: Effect of Acid Rain: Sept 79

CONFIDENTIAL

cc LPO MAFF Gregson
D/N FCO Parrott
D/M DTI
SO DOE Mr. Coles
DOT CO Nicholson
WO

MLE
RM

10 DOWNING STREET

17 May, 1984

From the Private Secretary

ENVIRONMENTAL POLLUTION

The Prime Minister chaired a meeting after Cabinet on 17 May to discuss environmental pollution. The meeting had before it your Secretary of State's minute of 14 May, together with comments from the Secretary of State for Energy contained in his minute of 16 May. In addition to your Secretary of State, those present were the Lord President, the Secretaries of State for Energy, Employment, Scotland and Transport, the Minister of Agriculture, the Chief Secretary, Mr. Whitney (FCO), Mr. Lamont (Department of Trade and Industry), Mr Waldegrave (Department of the Environment) Dr Nicolson and Mr. Gregson (Cabinet Office).

The meeting noted that a decision had been reached the previous day to adopt a proposal from the Foreign and Commonwealth Secretary that a United Kingdom initiative on industry and the environment should be taken at the London Summit.

Introducing his paper your Secretary of State said that it started from the proposition that the Government needed to adopt a more positive stance on environmental pollution, for both domestic and international reasons. A draft statement had been prepared on the United Kingdom's record in this field, for publication before the Economic Summit. A text would be circulated to colleagues shortly. He proposed that officials should undertake further work on possible future action in four main areas:

- air pollution, in particular acid rain and vehicle exhausts.

- the environmental impact of nuclear power.

- the countryside and wildlife conservation.

- secrecy (in response to the recommendation on this subject by the Royal Commission on Environmental Pollution).

RAMAAQ

CONFIDENTIAL

da

In discussion concern was expressed about the costs associated with some of the measures included in your Secretary of State's paper, in particular the possibility of a commitment to join the 30% Club. Estimates varied, but the cost could be such as to add 3 per cent to electricity prices. Decisions of this magnitude should be reached only after thorough consideration of the cost implications, and with due regard to other priorities. On the other hand it was argued, in relation to acid rain specifically, that changes already in train could take us a long way towards qualifying for membership of the 30% Club; and it was quite possible that technical developments could reduce the residual cost very substantially. This possibility underlined the importance of obtaining a satisfactory research basis for decisions.

In relation to Sellafield, concern was expressed about the implications for the nuclear power programme if confidence in the cleanliness of the plant could not be restored. As regards disposal of nuclear waste, the position had arguably been reached where neither land nor sea disposal was a tenable option - instead it might be necessary to look again at the possibility of longterm monitored storage at existing nuclear sites.

Support was expressed for the 'lean-burn' approach to reducing vehicle emissions rather than the fitting of catalytic convertors as currently favoured by the German Government (who were under pressure from the Greens). The Secretary of State for Transport argued that there was a case for a separate research initiative on pollution from diesel engines.

On the Wildlife and Countryside Act, the Prime Minister said that the legislation was clearly defective in a number of respects. Compensation was expensive, and the case for paying it at all was questionable in some circumstances. The meeting recognised that it was a difficult time to propose changes in the Wildlife and Countryside Act which would be to the detriment of agricultural interests. But the Government could equally be criticised if it took no action to remedy manifest defects in the compensation arrangements.

The Royal Commission's recommendation on secrecy was already being considered interdepartmentally, in the context of the Government's response to the Report as a whole. It was important to bear in mind the danger of encouraging scaremongering about environmental issues as a result of premature or incomplete release of information.

RAMAAQ

In summing up the discussion, the Prime Minister said that notwithstanding the urgency of the issues involved, it was essential to take considered decisions with due regard to relative costs and benefits. Your Secretary of State should prepare three further papers, in consultation with the Secretary of State for Energy, the Minister of Agriculture, the Chief Secretary of the Treasury and other Ministers involved. These papers should deal separately with acid rain, Sellafield, and the Wildlife and Countryside Act. They should consider a range of options and include a full assessment both of possible technical developments and the cost implications. The paper on acid rain was the most urgent, and should be circulated in good time to enable decisions to be reached before the Munich Conference and the EC Environment Council.

The Prime Minister added that she would arrange for a technical presentation on acid rain, to precede collective discussion of the Government's policy.

Copies of this letter go to the Private Secretaries to those Ministers who attended the meeting and to Colin Jones (Welsh Office) and Richard Hatfield (Cabinet Office).

(David Barclay)

J. Ballard, Esq.,
Department of the Environment

RAMAAQ

File RM

10 DOWNING STREET

From the Private Secretary

MR GREGSON
CABINET OFFICE

ENVIRONMENTAL POLLUTION

You should be aware that the Secretary of State for Wales has registered an interest in the current interdepartmental consideration of Environmental Pollution. I have sent him a copy of the past papers.

David Barclay
17 May, 1984

RM

A. J. C. 10/5.

F. a.

J. Coles, Esq.,
10 Downing Street.

With the compliments of

W.J. ADAMS

FOREIGN AND COMMONWEALTH OFFICE

LONDON, SW1A 2AH

cc PC

Foreign and Commonwealth Office

London SW1A 2AH

17 May 1984

R. Hatfield, Esq.,
Cabinet Office,
70 Whitehall,
London, S.W.1.

Dear Hatfield,

LONDON ECONOMIC SUMMIT INITIATIVE ON THE ENVIRONMENT

1. As agreed at the Prime Minister's meeting with CR. yesterday afternoon on Summit initiatives (Mr. Coles' minute of 16 May to Sir Robert Armstrong refers), I enclose a draft Speaking Note for Sir Robert Armstrong's use at the weekend.

2. We have cleared it on the telephone at official level with DOE, Department of Energy and Cabinet Office, but I am also sending copies, together with this letter, to Mr. Coles and to the Private Secretaries to Permanent Secretaries in all interested Departments.

Yours sincerely,

James Adams

W.J. Adams

/Copies to

Copies to: Private Secretaries to:

Sir G. Moseley, KCB,
DOE

Sir K. Couzens, KCB,
Dept. of Energy.

Sir P. Middleton, KCB,
H.M. Treasury

Sir B. Hayes, KCB,
DTI

Sir W. Fraser, KCB,
Scottish Office.

Sir M. Franklin, KCB, CMG,
MAFF

M.E. Quinlan, Esq., CB,
Dept. of Employment

P. Lazarus, Esq., CB,
Dept. of Transport

J. Coles, Esq.,
10 Downing Street.

PS
PS/Mr. Whitney
PS/PUS
Sir J. Bullard
Sir C. Tickell
Mr. J. Thomas
ERD
ECD(I)
ESSD
Planning Staff
MAED

DRAFT SPEAKING NOTE

LONDON ECONOMIC SUMMIT: INITIATIVE ON THE ENVIRONMENT

1. In setting up the Working Group on Technology, Growth and Employment, the Versailles Summit of 1982 recognised that revitalisation and growth of the world economy would depend to a large extent on cooperation among our countries and with other countries in the exploitation of scientific and technological development.

2. In their report for this Summit the Working Group have drawn attention to the close relationship between science and technology and environmental protection issues. They have identified five particularly important environmental issues on which further research is needed:

(i) the processes involved in acid deposition and how these relate to perceptible environmental damage such as reductions of fresh-water fish stocks and fir and spruce forest damage;

(ii) the safe storage and disposal of radioactive waste;

(iii) the protection of the marine environment;

(iv) world climate and climate change;

(v) the development and introduction of more efficient energy-generating technologies compatible with a significant reduction in emissions.

3. The relationship between industry and the environment is of great concern to us all. It is now widely accepted that the application of technology in industrial and agricultural processes should be compatible with acceptable standards of environmental protection.

4. Old technologies which harm the environment should wherever possible and necessary be cleaned up, and new technologies introduced only after unacceptable environmental consequences from their introduction have been eliminated and any valid concern allayed.

5. Solid scientific research is essential before we can successfully start to cope with environmental pollution. A great deal of work has been done and more is in hand, e.g. Royal Society's Joint Study with Royal Norwegian and Swedish Academies. But our scientists agree that further research into environmental protection issues is necessary and recommend that it should continue to be given high priority. We agree with this approach. We must also be confident that any remedial action we take will be cost-effective.

6. As a further step to finding solutions to these problems we believe that the Working Group should now be asked to:

(i) consider what has been done so far and identify specific areas for research where existing knowledge is inadequate;

(ii) identify possible projects for industrial cooperation to develop cost-effective techniques to reduce environmental damage; and

(iii) submit its report by 31 December 1984, taking into account other international discussions on these issues in the meantime.

7. The report and what action to take on it would then be considered at the next Economic Summit to be held in 1985 in the Federal Republic of Germany.

8. We are not proposing to add unduly to work being done already. We want to coordinate our efforts. In doing so, it will be necessary to review the current understanding of the relationship between industrial and agricultural processes and the environment and to report on the work conducted by relevant international organisations.

Econ Pol. Pt 15 L.E.S.

cc: D/En
SO
Mr Lamont
D/Emp
MAFF
Ch Soc/HMC
Transport
CO
Mr Whitmore
Mr Waldegrave

10 DOWNING STREET

From the Private Secretary

16 May, 1984

Dear John,

Environmental Pollution

I attach a note by Dr. Nicholson of the Cabinet Office about the technical background to tomorrow's discussion of environmental pollution.

I am sending copies of this letter to the Private Secretaries to those Ministers who will be attending the meeting, and also to Richard Hatfield (Cabinet Office).

Yours ever,

David

DAVID BARCLAY

John Ballard, Esq.,
Department of the Environment

CST

cc D.P.

PRIME MINISTER

Patrick Jenkin's suggestions in his minute of 14 May for a positive approach to UK environmental policy amount, of course, to a very major proposal. I believe it is vital that, before committing ourselves to the type of objectives set out in Patrick's minute, a realistic assessment is produced of the consequences both for public expenditure and jobs. Understandably, Patrick's minute is devoid of any such assessment, but I believe it would be wrong for Ministers to agree to such an initiative without clearly recognising what they are undertaking.

Patrick describes a range of initiatives to which we might agree, but I hope we will in the main stress the importance of further research. Certainly for many of these issues the prior and over-riding need is to demonstrate the cost-effectiveness of the very substantial expenditure involved, and to compare the benefits of such expenditure with other areas upon which the Government would like to devote resources. Certainly, at the Summit, it would be entirely appropriate for us to emphasise the need to co-ordinate research projects and environmental monitoring.

On nuclear waste disposal what is proposed is a very substantial reversal of the policy in the 1982 White Paper, which followed the lines of the Flowers report. What is now being proposed is that we should just pass on the problems to future generations. As far as Sellafield is concerned, my main desire is that

appropriate action is taken for confidence in the operations there to be restored. Sellafield is not directly comparable with the newer Cap de la Hague plant. There is a different fuel throughput, and the cost needed to bring Sellafield to the same environmental level would be considerable and has not yet been established. Reprocessing in the existing plant at Sellafield is the only available option for treating the used fuel from the Magnox stations, and it is these which currently generate the greater proportion of our nuclear power.

On acid rain, I totally reject the view that continuing research should be labelled a "do nothing" approach. I certainly doubt that we are at the stage where we can or should commit ourselves to joining the "30% club". Officials who have examined the cost of various options for reducing emissions have concluded that these would all involve considerable expenditure - with the prospect of substantially increased costs for industry. This is an area where much more work needs to be done before any conclusion is reached.

There is much that could be achieved in improving our environment. It is important to move in this direction with a clear knowledge of what is involved.

Copies go to the recipients of Patrick Jenkin's minute.

John Neilson

p.p. SECRETARY OF STATE FOR ENERGY
16 May 1983

(approved by the Secretary of State
and signed in his absence)

cc DP

CONFIDENTIAL

W.0368 16 May 1984

PRIME MINISTER

ENVIRONMENTAL POLLUTION - MEETING ON 17 MAY

I have seen the paper at entitled 'Environmental Pollution: A Positive Approach' from the Secretary of State for the Environment. My comments are as follows.

2. I strongly support the proposal for a positive strategy backed by specific cost-effective action plans in selected areas (some of which we can lead), coupled with stout and reasoned defence in areas where environmentalist pressure is directed towards expensive and ineffective measures, some of which are discriminatory against the UK.

3. The Secretary of State is rather optimistic in assessing the Department's performance since 1979 as 'holding our own ... reasonably well'. I think most people would rate the performance at about beta minus: the Government has been harried nationally and internationally over issues such as nuclear waste disposal at sea and on land, Sellafield, and acid deposition. It is seen to have capitulated correctly but belatedly on lead in petrol after Des Wilson's effective campaign and the Royal Commission's Ninth Report.

4. However the Secretary of State is absolutely right in saying that a continuation of a purely defensive strategy, the 'do nothing option' would be a political and economic disaster. We will become increasingly isolated internationally and eventually forced into accepting measures deficient in both cost-effectiveness and scientific support which we could, if constructively involved earlier, have negotiated towards a more sensible approach.

5. I hope therefore that Ministers can agree to the fresh approach advocated by the Secretary of State. Frankly, I do not see a viable alternative. On the other hand the options for action in the later part of his paper need further careful work by officials and are not yet, I submit, near a state where Ministers can make even a preliminary choice. Indeed Ministers may wish to suggest that further options should be added to those listed in the paper.

6. I have emphasised before that environmental protection is complicated both scientifically and its economic consequences. A careful judgement is required in each area as to the balance of scientific evidence and what action, if any, is justified at a particular time. The preparatory work necessary for the judgement by Ministers still needs to be completed by officials.

7. At your last meeting there was some disagreement on the amount of money spent by Government on R&D for environmental protection. The correct figure is £42 million for 1983-84. Any larger figure, as suggested by Treasury last time, must include Department and Research Council work with objectives other than the protection of the environment. The publicly-owned utilities and some private sector companies also spend money on R&D in this area but it is not possible to estimate the total. The amount they spend is, of course, determined by their interpretation of their legal responsibilities and their commercial judgement.

8. Whether or not Government spending on environmental protection R&D is sufficient is a matter of judgement. The Natural Environment Research Council has supported scientific work in Universities and its own Research Establishments in accordance with its assessment of the quality of recent proposals it has received and the total resources available to it. This support has undoubtedly maintained a high quality base in most of the relevant scientific fields. The Department of the Environment has decreased its support for applied research on environmental protection although it has recently started to increase it again. Looking at the gap between our scientific

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knowledge of the environment and proven solutions to the problems, I have to conclude that the earlier decision was a mistake. I also feel the publicly-owned utilities have, again until recently, been slow in progressing their own applied R&D on environmental matters.

9. I am copying this minute to Sir Robert Armstrong.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

Cabinet Office
16 May 1984

ENV AFFAIRS: ENV POLLUTION: SEPT 79

Prime Minister

You will also wish to look at the Policy Unit note, and Patrick Jenkin's minute (Flag A).

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P.01289

PRIME MINISTER

MT

DMB 16/5

Environmental Pollution

This is a follow-up to your meeting of Ministers on 5 April. There was general agreement then that the broad framework of United Kingdom policy was right, and in particular the need to weigh costs as well as benefits, on the basis of adequate and timely research. It was also agreed that the UK needed to take more credit publicly for its achievements and aims in a statement to be published in the run up to the Economic Summit.

Flag A

2. In his minute of 14 May the Secretary of State for the Environment suggests that it is also necessary to develop positive policy proposals, so that the Government can adopt a less defensive stance and is better able to resist pressure where it must be resisted. He identifies four areas for action:

i. the environmental impact of nuclear power
   - the handling of intermediate level nuclear waste
   - standards at Sellafield

ii. air pollution
   - restricting emissions of sulphur and nitrogen oxides from large plants to reduce acid rain
   - vehicle emissions

iii. countryside and wildlife conservation
   - improving the working of the Wildlife and Countryside Act 1981 and particularly its compensation formulae
   - giving the EC Structures Directive under the CAP a stronger thrust towards conservation

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iv. secrecy

- acceptance of the recommendation of the Royal Commission on Environmental Pollution that there should be a presumption in favour of unrestricted access for the public to information.

On all of these matters Mr Jenkin proposes that officials should do more work on the implications and costs before final decisions are taken.

This was written before the meeting which I understand reached a firm decision to go ahead.
Flag B
DMB 16/5

3. In addition the meeting will need to consider the proposal for a UK initiative at the Summit, on which you have already had some preliminary discussion. The Foreign and Commonwealth Secretary's minute of 8 May proposed a London Group on Industry and the Environment to foster cooperation on research, and on the development of cost-effective techniques to reduce environmental damage. You have expressed a preference for carrying out this work under the aegis of the existing Versailles Group (Mr Cole's letter of 10 May). In his minute of 15 May the Secretary of State for the Environment welcomes an initiative of this kind in principle. He suggests however that both the substance and tone of such an initiative should reflect the conclusions reached on the policy proposals in his earlier minute. You will also have seen comments from the Secretary of State for Trade and Industry and the Chancellor of the Exchequer (both of 15 May).

Flag C
Flag D
Flag E
Flag F

MAIN ISSUES

4. The main issues are as follows:

i. <u>on the policy proposals in Mr Jenkin's minute of 14 May</u>

- should officials do further work on them as "preferred options" with a view to final endorsement by Ministers later? or

- should officials do work on a range of options for handling these policy issues, without any steer at this stage from Ministers? or
- should any of the proposals be rejected now?

Again, you will wish to take account of the decisions reached today on this subject.

DMB 16/5

ii. on the proposed initiative at the Summit

- do we need an initiative at all? and, if so:
- should it be related to cooperation on research and development?
- should it be under the aegis of the existing Versailles Group rather than a new London Group?
- how is the substance and tone of the initiative affected by the discussion on Mr Jenkin's policy proposals?

Policy proposals

5. On the policy proposals generally some Ministers (for example the Secretary of State for Energy and the Chief Secretary, Treasury) may argue that the case has not yet been made out for changing existing policies on the issues discussed in Mr Jenkin's minute of 14 May. The line may be that officials should certainly do more work on these matters but without any presumption that Mr Jenkin's proposals are preferred options.

6. On the handling of intermediate level nuclear wastes it is clear that the Government is becoming increasingly boxed in. Disposal both at sea and on land would raise severe political difficulties. If it cannot be disposed of, it has to be stored. But the Flowers Report in 1976 said that a safe means of disposal of radioactive waste was an essential pre-requisite for the development of the civil nuclear programme. The Secretary of State for Energy will be most anxious to put no new weapon in the hands of those who wish to obstruct the civil nuclear

programme and he may therefore be reluctant at this stage to accept that storage, which could also arouse public disquiet, is inevitable. He might be prepared however to agree that further work should be done by officials on the possible implications of storage without any presumption at this stage that such a solution will have to be adopted.

7. On Sellafield the Chief Secretary may express concern about the cost of bringing the plant in line with the standards at Cap de la Hague within 5 years, and of ceasing all discharges to the sea by 1995. He may say that Ministers do not at this stage have the information about costs and benefits which would justify a decision of principle in favour of this proposal and that any further work by officials should cover a range of options rather than this one alone. The Minister of Agriculture may also dissent from a public commitment at this stage to a 5 year timetable, on the grounds that we do not yet know whether the necessary improvement could be attained within that period.

8. On acid rain and the EC large plants directive the Foreign and Commonwealth Secretary is likely to support the proposal that the UK should join the "30 per cent club" on the grounds that this would put us in a better position to resist successfully the larger reductions in emissions proposed in the present draft directive. The Secretary of State for Energy and the Chief Secretary are likely to say that even this option involves substantial costs, as Mr Jenkin concedes (£750 million and an electricity price increase of 3 per cent). They may argue that any further work should cover the full range of options set out in the recent report from the Working Group on Environmental Protection (EP(W)). It should be borne in mind however that a clear UK line will need to be settled by mid-June in time for the Munich Conference on air pollution and the discussion in the EC Environmental Council later that month.

9. On vehicle emissions there might be less difficulty than on some of the other proposals. The "lean burn" engine approach favoured by the Department of the Environment has the strong support of the Department of Trade and Industry, although the Department of Transport is more lukewarm about it. It ought to be possible to get agreement to further work by officials based on the lean-burn approach.

10. On the Wildlife and Countryside Act, there is, as Ministers acknowledged at the previous meeting, widespread concern about the operation of the compensation formulae. Mr Jopling may however take the view he expressed last time that it is too soon to make changes and that the current sensitivity of the farmers makes it undesirable to alter the arrangements at this time. If it is agreed that there should be legislation, the business managers will need to be consulted on whether the necessary clauses ought to be added to the Ministry of Agriculture's Pollution Bill which has a place in the 1984-85 Session. They will be concerned about any significant increase in the size of the Bill or the degree of controversy associated with it. MAFF fear that widening the scope of the Bill in this way might delay its introduction.

11. On the EC Structures Directive, the Minister of State at MAFF has already made proposals in Brussels for more specific references to the environment in the preamble. Mr Jenkin makes two further proposals: that assistance should be given to "farming cum conservation projects" and that investments which are inconsistent with environmental objectives should be excluded from assistance. The former proposal may be opposed on the grounds that it would add to, rather than reduce the cost of, the directive and would thus run counter to our general objective. On the second proposal the Minister of Agriculture may argue that a mandatory exclusion of such projects would have

no chance of acceptance; a provision permitting national exclusion might be negotiable but it remains to be seen whether the Minister of Agriculture would be willing to discriminate against UK farmers this way, bearing in mind his general attitude to UK domestic support for agriculture. If these proposals are to be pursued, it will need to be done through the usual official interdepartmental machinery for handling EC matters. It is thought incidentally that the reference to the Halvergate Marshes case in Mr Jenkin's minute is more relevant to the working of the Wildlife and Countryside Act than to the EC Structures Directive.

12. On secrecy there was some concern at the previous Ministerial meeting on 5 April about acceptance of the Royal Commission's recommendation, which essentially involves shifting the onus of proof to those who would avoid disclosure. In particular there was anxiety that this might lead to the release of information about nuclear matters which would be misrepresented and would strengthen the anti-nuclear lobby. The Royal Commission did however envisage exceptions to the general principle of disclosure on grounds of national security or commercial sensitivity, although they considered that exceptions on the latter ground ought to be few and kept under regular review. If Ministers are not convinced that they should commit themselves now to a decision in principle to accept the Royal Commission's recommendation, they ought to be able to agree that officials should be asked to examine in detail how far the Government might go in that direction and report back to Ministers.

Summit initiative

13. Most Ministers appear to be prepared to go along with the proposal for an environmental initiative at the London Summit, although without great enthusiasm. Relating the initiative to

cooperation on research would be consistent with existing UK policy and, as Dr Nicholson has suggested in his minute of 15 May, it ought to be possible to present it in a positive way so that it is not seen as a UK tactic to delay action on environmental matters. There also appears to be a preference in favour of putting the initiative under the aegis of the Versailles Group rather than setting up a new London Group.

14. Mr Jenkin sees a link between the initiative and the line taken by the meeting on his policy proposals. It is difficult to see specific links because even if Mr Jenkin's proposals were accepted much further work would need to be done by officials before policy announcements could be made and this clearly cannot be done in time for the Summit. Moreover Ministers may reject some of the proposals or ask for official work to be done on a wider range of options. The link in Mr Jenkin's mind may therefore be more general - ie that the reaction of the meeting to his policy proposals will indicate how positive Ministers wish to be on environmental matters, and that the emphasis given to a UK environmental initiative at the Summit, and the tone in which it is presented, should reflect that.

HANDLING

15. It may be best to divide the discussion into two parts: the policy proposals in the Secretary of State for the Environment's minute of 14 May; [and the proposal for a Summit initiative.]

16. On the policy proposals you will wish to invite the Secretary of State for the Environment to introduce his minute. You might then ask whether there are any general comments before discussing the four main areas for action: nuclear matters, air pollution, countryside and wildlife conservation, and secrecy.

The Secretary of State for Energy, the Minister of Agriculture and the Chief Secretary, Treasury are the Ministers with the greatest departmental interest.

17. On the Summit initiative you might invite comment particularly from the Foreign and Commonwealth Secretary and the Secretary of State for the Environment.

CONCLUSIONS

18. You will wish to reach conclusions on:

i. whether:

a. officials should examine the implications and costs of the proposals set out in paragraph 23 of the Secretary of State for the Environment's minute of 14 May, or

b. officials should consider these proposals along with other options, or

c. any of the proposals should be rejected.

ii. whether there should be a UK initiative on the environment at the London Summit and, if so, what form it should take.

PL

P L GREGSON

16 May 1984

a JOP

W.0365 15 May 1984

MR BARCLAY

Environmental
~~EXPERIMENTAL~~ POLLUTION - MAY 17th MEETING

Following my minute to you of 5 April, I enclose a document which attempts to summarise the technical position and the views of the Royal Commission for Environmental Pollution on issues relevant to Thursday's meeting. You may wish to circulate this document to other Ministers attending the meeting.

The questions posed as (1) and (2) in my earlier minute will be dealt with in my brief to the Prime Minister for Thursday's meeting.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

Summary of relevant parts of the Tenth Report of the Royal Commission for Environmental Protection (RCEP)

Best Practicable Environmental Option (BPEO) and Best Environmental Timetable (BET)

1. Pollution control in the UK has historically been based on the concept of 'Best Practicable Means' (BPM) where the word practicable is taken to include economic as well as technical and geographical feasibility. This contrasts with concepts used in the USA and elsewhere such as 'Best Available Technology' (BAT) where economic considerations are omitted.

2. The UK has also traditionally used an approach to environmental control based on 'Environmental Quality Objective' (EQO) and 'Environmental Quality Standard' (EQS) which relate to objectives and standards for a geographical zone. Continental practice has been in terms of emission standards applied to specific outlets and, where these are uniform, to a 'Uniform Emission Standard' (UES).

3. The RCEP rejects the use of UES as a means of eliminating natural advantages of geography which allegedly distort competition between central Europe and wet and windy countries such as the UK. It proposes that the EQO and UES systems should be used on their merits by adopting the 'Best Practicable Environmental Option (BPEO) and the 'Best Environmental Timetable' (BET). The former concept allows, for example, EQO where the use of the dilution effect of the environment is legitimate but UES for 'black list' substances where virtually any discharge is harmful. It also requires that all the environmental implications of a set of options are considered in, for example, energy production by nuclear of fossil-fuelled plants.

4. BET requires the development of an optimum timetable for the allocation of resources to pollution abatement in order to minimise costs through continuity of approach and anticipation of requirements.

Secrecy

5. In its evidence to the RCEP, the CBI accepts that the public needs to know whether or not quality standards are being maintained and that the results of environmental monitoring should be openly available. However they also draw attention to the risks of deliberate or accidental misinterpretation of data thus made available and the danger of release of trade secrets through the wider dissemination of data.

6. The RCEP takes the view that distortion of the technical aspects of an environmental problem is not made more difficult by keeping data secret and that it is not a tenable position to deny access to data on the grounds that the public may not be competent to assess it. It also believes that the trade secret problem has been exaggerated,particularly in the light of the modern analytical methods by which companies may gain information on their competitors' products. The CBI were only able to quote two cases in the world where trade secrets had been uncovered despite the much greater access given in many countries, expecially the USA.

7. The RCEP recommend that the guiding principle should be a presumption in favour of unrestricted access for the public to information which the pollution authorities obtain or receive by virtue of their statutory powers, with a provision for secrecy only in those circumstances where a genuine case for it can be substantiated. It further defines a genuine case as relating either to national security or to a trade secret; in the latter case justification would need to be reviewed on a regular basis.

Radioactive waste disposal

8. The RCEP does not address the Sellafield problem in detail. On the subject of nuclear power, it supports a modest increase in nuclear power capacity as part of a strategy for reducing dependence on fossil fuels as a primary energy source and for reducing the polluting effects of their combustion.

9. In order to increase public confidence in the disposal, storage and transport of radioactive waste, it recommends the addition of transport of nuclear materials to the terms of reference of the Radioactive Waste Management Advisory Committee, and the addition of local government and independent members to the Nuclear Industry Radioactive Waste Executive.

Acid Rain

10. It is certain that there has been a steady increase in the acidity of lakes and streams in northern Europe and that this, combined with other factors, has reduced or eliminated the fish population in some waters. The original hypothesis that the problem was due to wet deposition of sulphuric acid caused by long range emissions of sulphur dioxide has been shown to be a gross oversimplification.

11. It is now accepted that it is more correct to talk about acid deposition because both wet and dry deposition are important and that local sources of pollution are as important as long range pollution. It is also accepted that acid from nitrogen oxide emissions (about half of which come from motor vehicles and half from power stations) are important and that the proportion of sulphur and nitrogen oxide emissions which are actually deposited as acid depends critically on atmospheric emissions of other chemicals such as hydrocarbons and ozone.

12. A second 'acid rain' problem is the die-back of forests especially in Germany. Die-back is certainly happening and has worsened in recent years possibly as a result of a series of hot,sunny summers. The cause of the problem is not known; acid deposition from sulphur and nitrogen oxides probably plays a role but other factors such as ozone and even the nature of the forestation could be important.

13. The RCEP take the view that acid deposition is a serious problem but that the costs of making substantial reductions in emissions of sulphur and nitrogen oxides from power stations in the UK with current technology will be very high and that the benefit is presently uncertain. They recommend that a higher

priority be given to research on the problem. They also recommend that the CEGB should evaluate certain abatement options on a pilot scale in the next 5 years. The 'action package' of research and pilot programmes recently proposed by CEGB in their evidence to the House of Commons Select Committee on the Environment would, I understand, be taken by the RCEP as meeting their recommendation to the CEGB.

Vehicle Emissions

14. Lead emissions from motor vehicles have already been dealt with by the Government's decision to move to lead-free petrol although the need to extend this decision into the whole of the European Community remains. Concern remains on the emission of nitrogen oxides because of their contribution to acid deposition and the emission of carcinogenic hydrocarbons.

15. The RCEP recommend that in implementing the Government's decision to move to lead-free petrol, the vehicle industry should ensure that there is no increase in emissions of carcinogenic hydrocarbons. The RCEP also review the rival technologies, exhaust catalyst and 'lean-burn' engines for the control of nitrogen oxides and concluded that they were unable to choose between them at the present time.

16. However the UK motor industry, in common with most of the Continental motor industry (the prominent exceptions being Mercedes and BMW), strongly supports the 'lean-burn' concept as being appreciably less expensive and, in practice, at least as effective as the exhaust catalyst which uses platinum group metals as a catalyst. The 'lean-burn' concept has the advantage of reducing pollution at source rather than relying on subsequent conversion of polluting emissions to harmless products. Catalysts deteriorate in service, especially if abused and there is evidence that their average service performance is less good than 'lean-burn' although their theoretical performance is substantially better.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

Cabinet Office
15 May 1984

ENVIRONMENTAL AFFAIRS: Pollution
Sept 79

CONFIDENTIAL

ccPy

Treasury Chambers, Parliament Street, SW1P 3AG
01-233 3000

PRIME MINISTER

LONDON SUMMIT: POSSIBLE BRITISH INITIATIVE
ON THE ENVIRONMENT

Geoffrey Howe copied to me his minute of 8 May suggesting that we should promote a UK initiative on the environment.

2. I have considerable misgivings about this proposal. I appreciate that its purpose is to pre-empt unwelcome and expensive proposals which might be advanced by others. But I feel that there is a risk in taking a UK initiative of this kind that, in order to enable the proposed "London Group" to present a positive report to the German Summit next year, we would be under pressure to do more than our fair share of international research on this subject. We might also feel obliged to be more forthcoming than would otherwise be justified on EC proposals, such as the sulphur emission reductions proposed in the EC Large Plants Directive, which, if fully implemented, could cost up to £4-500 million a year (adding, incidentally, some 6-8 per cent to electricity prices). As a large user of coal-fired plants, the UK would be hit harder by this development than most of our competitors.

3. Somewhat similar objections apply to the alternative of asking the Versailles Group to study the matter, since again we would be building up expectations that we would try to ensure a successful outcome. But I agree that this would involve less risk than would the setting up of a separate Group. The Versailles Group should, for example,

be better placed to look at the matter in the context of priorities within all the other demands for scientific research.

4. On balance, therefore, I should prefer to avoid any UK initiative in this area. If, however, you and other colleagues feel that this is the only practicable way of pre-empting more damaging initiatives by other Summit countries, I would go along with the suggestion of remitting the matter to the Versailles Group (but I would not favour establishing a separate London Group). In that case, I hope that the Treasury would be fully associated with the preparation for the meetings of the Versailles Group.

5. Copies of this minute go to Geoffrey Howe and the other recipients of his minute of 8 May, and to Peter Rees.

N.L.

N.L.
15 May 1984

CONFIDENTIAL

cc DP
cc/c

PRIME MINISTER

LONDON SUMMIT: POSSIBLE BRITISH INITIATIVE ON THE ENVIRONMENT

In your Private Secretary's letter of 10 May you ask for advice on Geoffrey Howe's proposal in his minute of 8 May.

I welcome in principle an initiative of this kind. It could help us to re-establish a sound British position internationally in environmental matters. I am circulating, in parallel with this minute, a paper for your meeting on 17 May making a number of specific policy proposals which are directly relevant. Both the substance of a Summit initiative and the tone in which it is presented will reflect the conclusions which we reach on these.

However, I think you should be aware of a possible downside. Given the stance which we have adopted in previous international gatherings and the criticism which that stance has drawn, there is a real risk that an initiative which appears primarily to be aimed at further research work may be regarded with scepticism by some of the other Summit countries; they see our desire for research as the familiar British substitute for action, and they might treat the initiative as no more than a delaying tactic. I believe that that risk should be taken. The subjects listed in paragraph 5 of Geoffrey's minute are ones in which there is a good British scientific contribution to be made, and improved access to developments in technology elsewhere would be of advantage to us. The initiative would, however, require careful presentation to minimise the risks I have indicated.

I am copying this minute to those who received copies of Geoffrey's minute.

A C Allbery (Private Secretary)

for P J
15 May 1984
- agreed by the Secretary of State, and signed in his absence.

Economic Pol : Econ. Summit
Pt 15

F

DEPARTMENT OF TRADE AND INDUSTRY
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JF6510
Secretary of State for Trade and Industry

15 May 1984

The Rt Hon Sir Geoffrey Howe QC MP
Secretary of State for Foreign and
Commonwealth Affairs
Foreign and Commonwealth Office
Downing Street
SW1A 2AL

Dear Geoffrey

LONDON SUMMIT : POSSIBLE BRITISH INITIATIVE ON THE ENVIRONMENT

Thank you for copying to me your minute of 8 May to the Prime Minister.

2 I would like to register my support for something on the lines of your proposal. The UK's call for environmental action to be based on sound scientific evidence of need is often seen, mistakenly, as an attempt to delay such action. Full account must of course be taken of the costs to industry of individual measures, but the initiative you propose would emphasize our commitment to environmental protection where such protection can be shown to be necessary.

3 I suggest that the proposal should be examined in more detail through the E(P) machinery.

4 I am copying this letter to the recipients of your minute.

Yours ever
Norman

NORMAN TEBBIT

CC DP
AJC

Prime Minister

ENVIRONMENTAL POLLUTION: A POSITIVE APPROACH

INTRODUCTION

1. Since 1979, we have held our own on the environmental front reasonably well. We responded positively (and got considerable credit for it) to the Royal Commission's recommendations on lead: also to conservationists campaigns on, for example, whales and seals. We made the first major attempt to establish a general framework for conservation in the UK in the Wildlife and Countryside Act 1981 and won credit for making the attempt - though few now believe the Act to be wholly satisfactory as it stands.

2. We cannot, however, simply stop there. There is unfinished business (eg. lead in petrol, nuclear waste); there are increased pressures from international and domestic sources (eg. acid rain); there are new campaigns starting (eg. the Royal Commission recommendations on secrecy). Doing nothing is not an option: it means in reality fighting an unending series of dour, defensive battles, often with our own supporters or potential supporters, quite a lot of which we will in the end lose. This paper is written on the assumption that it is far better to select a package of positive and cost effective measures which will enable us to lead, and win credit for leading in some areas and at the same time to strengthen our position to resist pressure where it must be resisted.

3. We have identified four areas for action:

- the environmental impact of nuclear power;
- air pollution - acid rain and vehicle exhausts;
- countryside and wildlife conservation;
- secrecy.

4. As the Foreign Secretary says in his letter of 8 May, an environmental initiative would be helpful as the theme for the London Summit. We have other international deadlines this year such as the two German Conferences - on air pollution in June and on the North Sea in the autumn - and the progress of

Community legislation. An initiative beginning at the London Summit would enable us to avoid the dour negative positions at present forced on us for those occasions, and would culminate in our response to the recent 10th Report of the Royal Commission, which ranges widely.

THE ENVIRONMENTAL IMPACT OF NUCLEAR POWER DISPOSAL

5. We have a clear and defensible policy for the storage of high level nuclear waste under surveillance. However, we are faced with the basic dilemma on the disposal of both low level and intermediate level nuclear waste.

6. The ability to dump any nuclear waste at sea is likely to be short-lived. Political considerations in the face of international opinion are likely in the end to make sea dumping unacceptable irrespective of any scientific justification, even if we can get round the Trade Unions' objections. This makes it essential to continue disposing of low level waste on land (as currently at Drigg).

7. Disposal on land is unpopular too. The prospect of using non-nuclear sites such as Billingham for safe disposal of the rather more active wastes is becoming increasingly questionable. ICI (who own the site) have now withdrawn their co-operation from that proposal. It is by no means certain that a public inquiry would endorse such a proposal. DOE Ministers are about to bring forward proposals for a special planning procedure to compare sites, but it is also necessary to broaden our whole approach so that we can look again at a policy of storage of the rather more active (mainly intermediate level) wastes at existing nuclear sites and/or Sellafield. What I have in mind is storage under surveillance in specially engineered conditions which would allow for retrieval and final disposal when technologies are further advanced.

8. I am convinced that this approach should now be assessed in detail, alongside disposal, as it offers our best hope of restoring credibility to our nuclear waste disposal policy. May officials be asked to do this?

SELLAFIELD

9. Although over £100m worth of new plant is already being installed there, Sellafield remains the Achilles heel of an industry which it is vital to safeguard. Our immediate objective should be to make Sellafield as good in environmental terms as Cap de la Hague. Under plans and proposals currently under consideration this should be achievable in 8 years at an additional capital cost of some £100m. But is this extended timescale acceptable? May officials be asked to investigate urgently shortening it to 5 years? In addition, we need to look beyond this and consider the feasibility by 1995 of a complete cessation of discharges to sea. This would undoubtedly entail additional substantial investment and would only be possible if the land disposal/storage problem had been solved. However, if we can make this our stated objective, we will have taken a major step towards removing Sellafield from the limelight and will dramatically have taken the initiative. It may be thought that the next 10 years would in any case see us pushed slowly to such a position.

A BALANCED ATTACK ON AIR POLLUTION

10. We have promised a new Clean Air Act following the Royal Commission's Fifth Report. Our recent agreement to the EC "Framework Directive" now requires us to set a date for this. But well before this Act is on the stocks we must respond to the mounting pressures on us about "acid rain" and vehicle emissions. We led the world in clean air policy in the 1950's and 60's and we are now in process of losing our good reputation.

ACID RAIN

11. In the Community there is already substantial support for a commitment to reduce emissions of sulphur and nitrogen oxides. There is growing acceptance of the view that although scientific uncertainties remain, the case for prudential action in relation to lake, crop, forest, and building damage is now too strong to be ignored. The draft "large plants Directive" calls for reductions of 60% of sulphur and 40% of nitrogen from large combustion plants by 1995 from 1980 levels.

12. As the largest emitter of sulphur dioxide in Western Europe, we will not be able to deflect calls for action by relying only on more research. We require a package of measures which does not cost billions of pounds but reduces emissions enough for us to avoid isolation.

13. There are three options:

(i) do nothing - and face the pressures at home and abroad. This would include outright opposition to the large plants Directive. A "research only" programme only would be seen as doing nothing. Our resistance would be seen as obstructing progress on a major environmental front over the next years.

(ii) Go along with the specific requirements of the large plants Directive, subject to any modifications we can achieve in negotiation. This might cost £2bn capital or more, and involve an eventual electricity price increase of 8% or more. I do not recommend this course!

(iii) Produce a "moderate" package aimed at winning us the support of those who are not fanatics. The only sure bet is to join the "30% club" - the ten countries which have committed themselves to an overall reduction of 30% in SO2 emissions from 1980 levels

by 1995 (France, FRG, Netherlands, Denmark, Norway, Sweden, Finland, Austria, Switzerland, Canada). This is a much less demanding commitment than the EC Directive: it relates to total emissions, not only those from Large Plants. Total UK emissions have already fallen by about 15% since 1980: and (assuming that SO2 emissions would otherwise stay at about their present level) the remaining 15% could be achieved by 1995 in various ways, at costs up to about £750m, involving an eventual electricity price increase of some 3%.

14. As I said above, doing nothing is not an option. Nor, in my view, should we contemplate the kind of expenditures which would be involved in meeting in full the requirements of the large plants Directive. In the Geneva Convention we are committed to an 'effective decrease' in emissions by 1995. I think that the balance of both political and scientific advantage now justifies us in going further and accepting the '30% club' commitment. I admit that detailed scientific understanding here is incomplete. But there are good general grounds of environmental management for moving towards a further reductions of acidifying emissions; and to declare ourselves willing now to make a start on this is much better than being driven to possibly much more expensive remedies later on. By 'joining the 30% club' we would at once neutralise the persistent criticism of our stance in the Community, in Scandinavia and in Canada. We would provide ourselves with a much better platform both for negotiating downwards the terms of the large plants Directive and for keeping up our pressure for more research. The costs are not insignificant; but their incidence is not immediate, and technological developments may well make them in the end much less than the £750m I have quoted. Indeed the timetable of implementation is such that, if in say two years' time science suggests a different approach we will have lost very little. I submit that option (iii) is the right choice. May officials be asked to work up a policy based on aiming to join the 30% club?

15. The Germans and others will ensure that pressure to reduce vehicle emissions mounts because of their contribution to forest damage. We are all agreed that the German remedy - adoption of the American "three-way catalyst"[(a)] system - is unacceptably costly at some £2bn a year in equipment, maintenance, and wasted energy for the UK alone. There is an alternative strategy, to which we could commit ourselves, namely one based upon the "lean burn" engine. Setting a date for the cleaning up of car exhausts (which also contribute to acid rain) would be a substantial achievement for this government and would follow naturally from our "lead-in-petrol" initiative. The lean burn approach would also provide a major opportunity for our engine and car manufacturers. May officials work up the details of a comprehensive vehicle clean-up policy?

COUNTRYSIDE AND WILDLIFE CONSERVATION

16. This subject is likely to cause us some of our greatest political embarrassment unless we adopt a consistent and positive approach.

(a) Insertion of catalysts in the car's exhaust stream which convert three pollutants - carbon monoxide, hydrocarbons and nitrogen oxides - to inoffensive gases.

17. The Wildlife and Countryside Act is central. It is based on the principle that farmers should protect areas of special scientific interest in return for compensation for any loss of extra income. There is, of course, a danger that the Act leads to handouts for farmers for not doing what they anyway would not have done. The money for an individual farmer can be large. Cases involving annual payments of several hundreds of thousands of pounds are pending. What is more, the Act has certain loopholes which are being dealt with in the comparable legislation proposed in Northern Ireland. These need to be closed. It is also desirable to review the way in which compensation is calculated. May officials work up such a package of improvements to the Act, including a re-assessment of the compensation formulae?

18. Any proposed legislative changes to the Wildlife and Countryside Act (which would be likely to have all-Party support) could be included in an expansion to (with some retitling) of the Pollution (Protection of Food and the Marine Environment) Bill scheduled for 1984/85. OD(E) recently recommended that a statutory regime for pesticides control should also be included in this Bill.

19. A wider question which should now be addressed is the scope for directing more of the agricultural resources of the CAP into farming which has a conservation dimension. Could the Structure Directive currently under discussion in Brussels even now not be given a somewhat stronger thrust towards conservation, both in the positive sense of extending the range of the Directive to include farming-cum-conservation projects, and in the negative sense by excluding investments which are inconsistent with environmental objectives? Other countries, and some legal advice, seem to say that this may be possible already; if so, could we not take an initiative in this area? We have an important test case at Halvergate Marshes just ahead of us.

SECRECY

20. The recent Royal Commission Report recommended that a guiding principle behind all legislative and administrative controls relating to environmental pollution should be a presumption in favour of unrestricted access for the public to information. Obviously, real national and commercial secrets would need to be protected, but the onus of proof should be on those who seek to avoid disclosure. I recommend that we should publicly endorse the Royal Commission's approach.

OTHER MEASURES

21. We have already agreed to publish a statement of Britain's achievements relating to environmental pollution before the Economic Summit in June.

CONCLUSIONS

22. Unless we adopt a more positive approach to environmental pollution, we are likely to be forced increasingly onto the defensive and ultimately to have to accept measures which would not be in our best interests. Furthermore, we have an increasing need to restore public confidence in our whole approach to this area.

23. I therefore invite colleagues to agree that the full implications and costs of the following proposals should be evaluated, and that the terms of a British Initiative at the London Summit should be drawn with these in mind:

- The storage of intermediate level nuclear waste on existing nuclear sites and/or Sellafield.

- Improvement of Sellafield so as to bring it up to the standard of Cap de la Hague within 5 years, with possible complete cessation of discharges in 10 years.

- Preparation of a positive package of measures on acid rain with the aim of joining the 30% club.

- Promotion of the "lean burn" solution to vehicle emissions.

- Amendment of the Wildlife and Countryside Act to close loopholes and to adjust the basis for compensation.

- The scope for promoting conservation - friendly farming with CAP resources.

- The shift of the onus of proof that confidentiality should be protected onto those who seek to avoid disclosure.

24. I am copying this to Geoffrey Howe, Tom King, Norman Tebbit, Peter Walker, George Younger, Nick Ridley, Michael Jopling and Peter Rees, and to Sir Robert Armstrong.

P.J.

P. J.

14 May 1984

PRIME MINISTER 14 May 1984

ENVIRONMENTAL POLLUTION: A POSITIVE APPROACH

Patrick Jenkin's paper identifies a selective package of positive and cost-effective measures which meets genuine concerns about aspects of our policy and presentation. Such a programme is needed to regain the political initiative and to restore public confidence in pollution matters.

We have been involved in the preparation of this paper and support the four areas of particular concern discussed.

- the environmental impact of nuclear power;
- air pollution - acid rain and vehicle emissions;
- countryside and wildlife conservation;
- secrecy.

However, further work is required before detailed policies for these subjects can be agreed. Patrick has identified the most promising options which are designed to meet our objectives at minimum cost.

We agree that officials should be asked to assess the full implications and costs of Patrick's recommendations.

THE ENVIRONMENTAL IMPACT OF NUCLEAR POWER

Disposal - As Patrick points out, we are faced with a basic dilemma on the disposal of both low level and intermediate level nuclear waste. Although a policy of storage under surveillance at existing nuclear sites and at Sellafield would be a major departure from our current policy, we do need to rethink our whole approach if we are to restore credibility to our nuclear waste disposal policy.

Sellafield - This is a genuinely worrying area and we must do all we can to meet public concern. We cannot expect the public to understand why Sellafield should not be of similar technical quality to the comparable French plant at Cap de la Hague.

Such an objective is technically feasible over five years and should be assessed in detail.

Although the costs would be significant - perhaps an additional £100 million - it is likely that we shall have no alternative if we are to continue to treat Magnox waste at Sellafield. If we do not adopt this approach we could well be forced to close the Magnox reprocessing facilities.

DASAAT

Existing waste at Sellafield could be reprocessed over three years. New waste could either be stored or exported to France.

The case for refurbishment is further strengthened by the CEGB's recent decision to extend the operating life of the Magnox stations by five years. It would be a legitimate use of some of the resulting cost savings to improve the reprocessing facilities for Magnox waste.

A BALANCED ATTACK ON AIR POLLUTION

Acid Rain - Patrick's proposals recognise that it is no longer enough for us to deflect calls for action with the argument that more research is needed to understand the problems.

Against this background the option of joining the 30% club looks the most promising. Sulphur levels have already fallen by about 15% since 1980 and the implications of removing a further 15% by 1995 should be evaluated. We would expect technological developments to produce lower cost solutions than the £750 million (3% on electricity prices) mentioned in the paper. At the moment neither the CEGB nor the manufacturers have any real incentive to reduce costs. There are also a number of supply options related to coal quality and cleaning which could further reduce the cost.

Nevertheless, it is extremely difficult to assess the cost-effectiveness of such a programme. A balanced judgement of available scientific evidence indicates that there is a good chance that such an approach would improve the problem of acid rain although to an uncertain extent. It would certainly help the UK's international standing in environmental matters.

A more limited approach could be based on the imaginative Development and Pilot Action Programme recently put forward by the CEGB. This programme would cost about £50 million and would enable us to establish the most cost-effective solutions for reducing emission levels. As such it would indicate that both industry and the Government are taking the problem seriously.

This is a defensible approach although it would still leave us internationally isolated and would not in itself reduce emissions or acid rain. We recommend, therefore, that the CEGB programme should be assessed in terms of its potential contribution to meeting the objective of reducing total emissions by 30%.

Vehicle Emissions - The "lean burn" engine provides an

excellent opportunity for a major initiative to follow up our commitment to removing lead from petrol. Cleaning up car exhausts during your Administrations would be a substantial achievement.

COUNTRYSIDE AND WILDLIFE CONSERVATION

The Wildlife and Countryside Act is leading to huge handouts for farmers to do nothing at great cost to the taxpayer. The Act is in urgent need of revision both to close loopholes and to revise the basis of compensation.

We should consider bringing our approach into line with that adopted for the conservation of buildings ie a regulatory framework rather than a compensation principle. If we do wish to continue with the compensation principle, this should be a one-off payment related to net income foregone over perhaps three years.

The scope for channelling some of the agricultural resources of the CAP into conservation is an important question which should be addressed.

SECRECY

The present situation does not work to our advantage as selective leaks continually cause us embarrassment. The Royal Commission has recommended that there should be a presumption against secrecy except in cases involving national or commercial security.

We support this recommendation as a way of restoring confidence without in any way prejudicing commercial and national interests.

ECONOMIC SUMMIT

We support the Foreign Secretary's suggestion for a British initiative on the environment at the London Summit. The arguments for raising our international profile on environmental matters are persuasive.

We recommend that your meeting on Wednesday should endorse the idea of an environmental initiative in principle. This approach would be complementary to the proposed UK programme of action to be discussed on Thursday.

A positive package of UK measures coupled with the international initiative will make it considerably easier for us to resist unreasonable international pressures on other aspects of environmental pollution later in the year.

DASAAT

CONCLUSION

We support both Patrick Jenkin's recommendations and the Foreign Secretary's proposal for an environmental initiative at the Economic Summit.

This twin approach provides us with an ideal opportunity to seize the political initiative and to restore public confidence in what has become an increasingly worrying area.

DLP.

DAVID PASCALL

DASAAT

[Policy Unit Draft]

CONFIDENTIAL

DMB 11/5

9 May 1984

ENVIRONMENTAL POLLUTION: A POSITIVE APPROACH

INTRODUCTION

This paper identifies a selective package of positive and cost-effective measures which meet genuine concerns about aspects of our policy and presentation. Such a programme is needed to regain the political initiative and to restore public confidence in pollution matters.

We have identified four areas of particular concern:

- the environmental impact of nuclear power;
- air pollution - acid rain and vehicle emissions;
- countryside and wildlife conservation;
- secrecy.

The Government needs a clear policy on these issues by June in order to meet a series of international deadlines this Summer. This provides an ideal opportunity to raise our profile on environmental matters immediately before the Economic and European Summits in June.

A positive package of measures now will make it considerably easier for the UK to resist unreasonable international pressures on other aspects of environmental pollution later in the year eg in formulating our policy for the North Sea Conference to be held in the Autumn.

We shall be able to build on this initiative later in the year when we publish the Government's response to the recent 10th Report of the Royal Commission on Environmental Pollution.

THE ENVIRONMENTAL IMPACT OF NUCLEAR POWER

We are all agreed on the importance of a successful nuclear power programme. However, our present policies on the disposal and storage of nuclear waste could well jeopardise this objective.

Recent events at Sellafield, the condemnation of sea dumping and our continuing inability to satisfy the public that we can dispose of nuclear waste safely have badly damaged our credibility.

CONFIDENTIAL

DASAAL

Disposal

We have a clear and defensible policy for the storage of high level nuclear waste under surveillance. However, we are faced with the basic dilemma on the disposal of both low level and intermediate level nuclear waste.

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

Disposal on land is generating considerable public concern. The prospect of using non-nuclear sites such as Billingham for safe disposal is becoming increasingly questionable. It is by no means certain that a public inquiry would endorse our policy in this area.

It is therefore necessary to rethink our whole approach. We need to look more closely at a policy of storage under surveillance at existing nuclear sites and at Sellafield. Appropriate treatment could then take place later when technologies are further advanced.

I am convinced that this approach should now be assessed in detail as it offers our best hope of restoring credibility to our nuclear waste disposal policy.

Sellafield

This is a generally worrying area and we must do all we can to meet public concern. Our objective must be to make Sellafield as good in environmental terms as any plant in the world. Such an objective would require a discharge level of 20 curies and is technically feasible over 5 years.

The cost would be significant - £100 million. But I consider that we have no alternative if we are to continue to treat Magnox waste at Sellafield. If we do not adopt this approach I fear that we shall be forced to close Sellafield and export Magnox waste to France.

These comments do not of course apply to the Thorpe Plant which handles AGR and PWR waste.

A BALANCED ATTACK ON AIR POLLUTION

The need to legislate to implement an EEC directive on air pollution gives us an opportunity to update and consolidate our clean air legislation. This provides us with an excellent opportunity to respond to two main areas of concern - acid rain and vehicle emissions.

DASAAL

Acid Rain

In the community there is already substantial support for a commitment to reduce sulphur and nitrogen oxide emissions. We face an EEC directive that calls for a reduction of 60% from large combustion plants. There is growing acceptance of the view that although scientific uncertainties remain, the case for prudential action in relation to lake and forest certification is now too strong to be ignored.

As the largest emitter of sulphur dioxide in Western Europe, it is no longer enough for us to deflect calls for action with the argument that more research is needed to understand the problems. We require a cost-effective package of measures which does not cost billions of pounds but which will go some way to meeting criticism.

There are 3 options:

(1) The CEGB have recently put forward a development and pilot action programme. This programme would cost and would enable us to establish the most cost-effective solutions to any future requirements to reduce emission levels. As such it would indicate that both industry and the Government are taking the problem seriously.

(2) Join the 30% club. At the recent Ottawa Conference 9 European countries including Western Germany, France and the Netherlands pledged themselves to reduce sulphur dioxide emissions by at least 30% by 1995 from 1980 base levels. Our own emissions have already fallen by about 15% since 1980 and the cost to meet the 30% objective would be £750 million.

We could also draw up a programme to reduce total acidity by 30% at significantly less cost. This approach is attractive although our European partners would probably not accept that we were meeting the 30% objective.

(3) To meet the EEC directive for a reduction of 60% fron large combustion plants. This approach would incur significant costs - .

I submit that the choice lies between the first and second options. The first option is a defensible approach although it could still leave us internationally isolated. I therefore recommend that the detailed implications of joining the 30% club should be evaluated.

DASAAL

Vehicle Emissions

We are all agreed that the adoption of the American 3-way catalyst system is unacceptably costly at some £2 billion a year in equipment, maintenance and wasted energy for the UK alone.

The "lean burn" engine, however, provides an excellent opportunity for a major UK initiative to follow-up our commitment to removing lead from petrol. Cleaning up car exhaust would also contribute to reducing the problem of acid rain and would be a substantial achievement for this Government.

Such an approach is likely to be much more cost-effective than the catalyst approach. Although theoretical lower emission levels are possible with the latter, in practice these are unlikely to be achieved. The lean burn approach would also provide a major opportunity for our engine and car manufacturers.

COUNTRYSIDE AND WILDLIFE CONSERVATION

This subject is likely to cause us some of our greatest political embarrassment unless we adopt a consistent and positive approach.

The Wildlife and Countryside Act is a particular example. It was based on the principle that farmers would respect areas of special scientific interest in return for compensation for any loss of extra income. In practice the requirement to give 3 months' notification of proposed designation has not provided an adequate safeguard for sites of natural beauty. Furthermore, the Act is now leading to huge handouts for farmers to do nothing at great cost to the taxpayer. Cases involving annual payments of several hundreds of thousands of pounds are pending.

I recommend that the Act should be revised in order to close the 3 month loophole and to change the basis of compensation. We should consider bringing our approach into line with that which is adopted for the conservation of buildings ie by a regulatory framework rather than by compensation. If we do wish to continue with the compensation principle, I propose that this should be a one-one payment related to net income foregone over three years.

Any proposed legislative changes to the Wildlife and Countryside Act could be included in the Pollution (Protection of Food and the Marine Environment) Bill scheduled for 1984/85. OD(E) recently recommended that a statutory regime for pesticides control should also be included in this Bill.

DASAAL

A wider question which should now be addressed is the scope for channelling some of the agricultural resources of the CAP into conservation. We should consider whether the Structures Directive currently under discussion in Brussels could be given a stronger thrust towards conservation, both in the positive sense of extending the range of the Directive to include conservation projects, and in the negative sense by excluding investments which are inconsistent with environmental objectives. In comparison with the Dutch for example, the UK has taken very little advantage of the opportunities in this area.

SECRECY

The recent Royal Commission Report recommended that a guiding principle behind all legislative and administrative controls relating to environmental pollution should be a presumption in favour of unrestricted access for the public to information. The exceptions would be where national or commercial security would be at stake.

I recommend that we should publicly endorse this approach. The present situation does not work to our advantage as selective leaks continually cause us embarrassment. The Royal Commission's Report would be a way of restoring confidence without in any way prejudicing legitimate commercial and national interests.

OTHER MEASURES

We have already agreed to publish a statement of the Government's achievements and aims relating to environmental pollution before the Economic Summit in June.

CONCLUSION

Unless we adopt a more positive approach to environmental pollution, we are likely to be forced increasingly on to the defensive and to ultimately have to accept measures which would not be in our best interests. Furthermore, we have an urgent need to restore public confidence in our whole approach to this area.

I therefore invite colleagues to agree that the full implications and costs of the following proposals should be evaluated:

- The storage of low level and intermediate level nuclear waste on existing nuclear sites and Sellafield.

DASAAL

- To make Sellafield as good in environmental terms as any plant in the world within 5 years.

- To prepare a positive package of measures on acid rain with the aim of reducing emissions by 30% by 1995 from 1980 base levels. This package would incorporate the CEGB's development and pilot programme.

- To promote the "lean burn" solution to vehicle emission.

- To amend the Wildlife and Countryside Act to close the 3 month loophole and to change the basis for compensation.

- The scope for channelling CAP resources into conservation.

- Endorsement of the Royal Commission's approach to secrecy.

DLP.

DAVID PASCALL

DASAAL

CABINET OFFICE
70 WHITEHALL
LONDON SW1A 2AS

233 8535
01-930 5422 ext

9 May 1984

Dear Mr Turnbull,

I enclose the amendments to the background note which I mentioned. I have not attached the proposed layout of the PQ, since I understand a written PQ was intended, and Dan Graham's redraft was based on an oral question.

I am will wish to note that the source of the Table is UNECE, not OECD.

Yours sincerely,

Elizabeth Lam

Department of the Environment
Room A308
Romney House 43 Marsham Street London SW1P 3PY
Telex 22221 Telephone Direct Line 01-212 8004
Switchboard 01-212 3434
GTN 212

Dr Robin Nicholsonn
Room 322
Cabinet Office
70 Whitehall
London Swl

9 May 1984

Dear Robin,

PQ ON ACID RAIN

I have taken the liberty of suggesting some changes to the draft you left with me this morning, and I attach a revision which shortens the main answer and relegates some of the other material to supplementaries. — in case it's helpful!

I have some minor points on the background note. The two paragraphs on the second page contain some inaccuracies and should correctly read as follows:

> The UK is most vulnerable to criticism on the grounds that it has shown reluctance to act to curb power station emissions by retrofit programmes, rather than that it is the major source of these pollutants in Western Europe. The decline in overall UK emissions has been mainly achieved by other industrial plants switching from fuel oil to low sulphur gas, but power stations are now correspondingly more significant as sources of sulphur and nitrogen oxides. But the UK has argued that, without understanding the science, there is a risk of undertaking expensive and ineffective remedial action on power stations.
>
> In terms of deposition in other countries the UK is by no means the worst offender in Europe. Five ~~other~~ countries contribute more to sulphur deposition in other countries than does the UK (FRG, GDR, Poland, Czechoslavakia and Yugoslavia) although UK total emissions are about the same as Italy, West and East Germany, and Poland.

The table does, it is true, appear in our Select Committee evidence; but it is based on a series of modelling exercises carried out under the European monitoring and evaluation programme (EMEP) of the Geneva Convention, and while the figures are no doubt reasonably reliable as an indication of comparative magnitudes, the air of precision which they convey is probably slightly misleading. You may therefore think it wiser

not to inflict the table in its entirety on the Prime Minister, at any rate for the purposes of an oral Answer. If you do, however, the heading to the second column should be "Contribution to Deposition in other Countries"; and in that column the entry for Italy should be 59,100 and not 199,100 as printed. (This is an error in our own paper which we are hastening to correct).

Yours ever

Dan Gruffydd Jones

D GRUFFYDD JONES

10 DOWNING STREET

From the Principal Private Secretary

Dr. Nicholson

Acid Rain - Chancellor Kohl

Many thanks for your minute of 8 May (W.0344) which the Prime Minister has read with interest. I think it more likely that Chancellor Kohl misunderstood his brief than that there was any mistake in translation.

E E P BUTLER

9 May, 1984.

cc P.C.
C.D.P.

PM/84/74

PRIME MINISTER

London Summit: Possible British Initiative on the Environment

1. We have already discussed possible British initiatives designed to give a distinctive character to the London Summit. Unfortunately, the ideas which have been floated so far have not aroused great interest from the Permanent Representatives of the other Summit participants. Although we agreed at our meeting on 30 April to pursue some of them, we still, in my view, need an extra element if we are to make a public impact. I believe that the right kind of initiative in the environmental field would not only make such an impact but would be well worth pursuing for its own sake.

2. The relationship between industry and the environment is of great concern in all the Summit countries. Indeed this concern was reflected in our 1983 Election Manifesto where we re-affirmed our intention to remove lead from petrol, to reduce the lead content in paint, food and drinking water, as well as to reduce river pollution and to increase controls over waste disposal. We also acknowledged the need to reduce further the levels of smoke and sulphur dioxide in some areas. Despite all this we still have a largely undeserved reputation (particularly in the FRG and Canada) as one of the least forthcoming countries on environmental issues. A Summit initiative in this field would be an excellent opportunity to correct this impression and could do much to ease popular environmental pressures, rather on the pattern of the CDU's initiative in the Federal Republic.

3. You have of course already expressed concern that the government's public stance on environmental pollution appears to be defensive and reactive. In view of this, Ministers are currently reviewing our policy on environmental pollution. We held a first meeting on 5 April, and will meet again on 17 May.

We have already agreed that it would be desirable to publish a statement on the government's achievements and aims relating to environmental pollution before the Summit.

4. This is certainly not the time to incur heavy extra industrial costs or do anything which could reduce the margin of our competitiveness. I believe, however, that our domestic and international reputation would be considerably enhanced if we stressed that we supported international scientific research in order to establish an agreed understanding of the causes of environmental pollution and would welcome industrial collaboration to develop cost-effective technology to reduce the damage. Despite the insistence of countries like Germany and Canada on percentage targets for the decrease in pollution, there is a growing realisation that the causes of acid rain and other phenomenon are by no means as clear as the propagandists claim. I also believe that a carefully conducted international research strategy would in the long run make economic sense.

5. The inter-action between industry and the environment is a recurring theme in the work of the Versailles Group, though not central to it. The Group has identified five environmental protection issues requiring urgent attention, namely:

(i) the processes involved in acid deposition, and how these relate to perceptible environmental damage;
(ii) the safe storage and disposal of radio-active waste;
(iii) the protection of the marine environment;
(iv) world climate and climatic change (for example the impact of increasing levels of carbon dioxide in the atmosphere);
(v) the development and introduction of more efficient energy generating technologies compatible with reduction in harmful emissions.

6. My suggestion is that we should propose a new Working Group, to be called the London Group on Industry and the Environment, whose job would be to:

(i) identify specific areas for research where existing knowledge is inadequate and bring together what has been done so far;

(ii) identify possible projects for industrial cooperation to develop cost-effective techniques to reduce environmental damage;

(iii) report to the 1985 Summit, taking into account international discussion on these issues in the meantime. (This would be a one off report unlike the work of the Versailles Group which reports from Summit to Summit. The London Group would effectively take over the urgent environmental protection issues from the latter).

7. Arguments against an initiative might be advanced as follows:

(i) that sufficient work was already being done elsewhere, and that a new Group would simply duplicate it. But most subjects taken at the Summit are under consideration elsewhere: the Summit provides a unique means for giving work new impetus and bringing out its positive aspects;

(ii) that this was a British delaying device to hold up remedial action already necessary. The counter arguments are obvious;

(iii) that the idea would not appeal to the Americans and perhaps one or two others who stand accused of severe environmental pollution. This is largely a question of presentation. The Americans are spending more than anyone else on remedial research already;

(iv) that it would prove expensive. But at least (see paragraph 4 above) we should be able to make decisions on the basis of the best knowledge available. It should also be borne in mind that remedial action could well become more expensive as time goes on.

8. The arguments for an initiative may be briefly summarised:

(i) it would publicise the need for solid scientific research and for establishment of the right scientific

basis before taking action to cope with environmental pollution;

(ii) it would bring together work on the subject in the seven most important industrial countries in the world and the European Community;

(iii) it would help meet popular pressure for action to cope with real and potential damage to the environment, and thereby help defuse demands for what might otherwise be precipitate or inappropriate action;

(iv) it could mark out the London Summit as a turning point in the way industrial societies cope with the problems they have created with their own environment.

9. I am copying this minute to Patrick Jenkin, Nigel Lawson, Peter Walker, Norman Tebbit, Tom King, George Younger, Nicholas Ridley, Michael Jopling, William Waldegrave and Sir Robert Armstrong.

GEOFFREY HOWE

Foreign and Commonwealth Office

8 May, 1984

010

CR

Please re-type Q&A and first page of background note

Dms 9/5

W.0343

8 May 1984

MR TURNBULL, NO 10

- As requested, I attach a draft PQ on acid rain. A copy of the draft has been sent to DoE and I shall let you have any comments tomorrow.

- I also attach a copy of a minute I have sent to Robin Butler which bears on the subject.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

To ask whether in view of recent

Q. ~~Does~~ the Prime Minister ~~agree with the~~ criticism ~~made~~ she will make a statement on the UK's record on acid rain. ~~by Mr Brian Redhead that "the UK leads the world in acid rain"?~~

~~A~~. I do not. The statement ~~you refer~~ to is misleading, simplistic and quite ~~wrongly~~ singles out the UK for blame.

(A) The relationship between emissions from combustion plants and environmental damage attributed to acid rain is uncertain. For example, scientific evidence now suggests that vehicle emissions and ozone play an important part in the process leading to forest damage.

~~Furthermore,~~ Even as this research continues, ~~T~~the trend of emissions is strongly down in the UK. Since 1970 there has been a 34 per cent reduction in sulphur dioxide emissions, and whereas in 1950 25 per cent of such emissions in Europe* came from the UK, now the figure is 11 per cent.

~~But my~~ The Government therefore believes that it is important to develop a better understanding of the scientific basis of what is more correctly termed acid deposition so that cost-effective action can be taken to prevent damage to the environment. ⊗

Reproduce ⊗ here

* Excludes USSR

Background

The phenomenon known as acid rain, but referred to more accurately as acid deposition (acid mist and dry deposition of particulates are also significant) has become a major environmental issue in Scandinavia (where it is blamed for reductions in fish populations in rivers and lakes) and West Germany (which has become alarmed at the deterioration in its forests). The UK is often singled out for special blame. This is because it emits relatively large amounts of sulphur dioxide and nitrogen oxides from its largely coal-fired power stations and it is argued that the prevailing winds carry these primary pollutants which are then converted into the secondary pollutants - sulphuric acid, nitrogen dioxide and nitric acid - and deposited in Continental Europe, particularly Scandinavia, as acid rain.

Yet the atmospheric chemistry underlying this process, and indeed the local processes whereby acid deposition is implicated in environmental damage are far from clear and are extremely complex. Scientists generally accept there is a relationship between increased acidity in fresh water and the decline of fish stocks, but even here, knowledge is imperfect and there are several intervening variables. For this reason, the CEGB and the NCB have funded a major international study under the auspices of the Royal Society, in collaboration with equivalent learned societies in Norway and Sweden, costing £5m over 5 years.

Furthermore, there are [illegible] sources of environmental acidity other than acid rain and the relative contributions of these various sources is not established.

when retyping, retain X in background note.

In connection with forest damage in Central and Western Europe, it is becoming clear that local pollutants and local conditions are crucial, with vehicle emissions significant as a source of nitrogen oxides and hydrocarbons. It is possible that ozone, formed during photochemical reactions involving nitrogen oxides and hydrocarbons is more directly implicated in forest damage than acid deposition as such. This is especially the case in hot, dry summers as most of Europe has had in the late 70s and early 80s.

Prime Minister

Lead emissions are not themselves a cause of acid rain.

2

W.0344

8 May 1984

PERB

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MR BUTLER

ACID RAIN - CHANCELLOR KOHL

The latter, I'm sure

See GERMANY visits of Kohl

There is a curious error of translation or Chancellor Kohl's understanding of his brief in your note of his meeting with the Prime Minister. I hasten to correct it since the Prime Minister mentioned the German view of lead as a possible cause of acid rain in her meeting with Sir Keith Jospeh on 3 May - at the time I didn't understand the reference.

Lead is only important in the acid rain controversy to the extent that it poisons vehicle exhaust catalysts which can be fitted to control emission of nitrogen oxides which in turn are believed to be one of the primary causes of acid rain. Thus exhaust catalysts require the adoption of lead-free petrol as has happened in the USA and as is proposed in Germany. The UK and other European countries prefer 'lean-burn' engines to control nitrogen oxides but, as you know, the UK is also moving to lead-free petrol for human health reasons.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

Science & Tech Sept 83

Science Budget

RESTRICTED

Subject on SCIENCE + TECHNOLOGY
Science Budget
Spt. 83.

FILE
da

10 DOWNING STREET

From the Private Secretary

4 May 1984

Dear Elizabeth,

SCIENCE BUDGET

The Prime Minister held a meeting yesterday to discuss the science budget and the way in which priorities within it were determined. Present were your Secretary of State, Mr. Brooke, Mr. Hancock, Dr. Nicholson, Sir David Phillips (Chairman of the Advisory Board for the Research Councils) and Professor John Kingman (Chairman of the Science and Engineering Research Council).

The Prime Minister invited Professor Kingman and Sir David Phillips to report on the opportunities for scientific research and the way in which the science budget was able to respond to them. She asked whether the system of interlocking committees was the best way of making the difficult choices necessary.

Professor Kingman said there was a spectrum of research - basic, strategic and applied. It was important for the UK to maintain an effort over the whole spectrum. The most difficult choices were in basic science where the final application could not be predicted. It could not have been known, for example, how far basic work in solid state physics would lead to productive applications in semi-conductors and microelectronics. The UK was fortunate in having an active system of university research. This enabled the Government to conduct research in a cost-effective way by providing the additional costs which university centres needed.

On the way in which decisions were taken, he said many committees were necessary to cover all the fields which a research council like SERC was seeking to cover. Such committees were inevitably conservative but he nevertheless thought the system was the best available. The cost of administering the system of peer review was around 2-3%, a reasonable price to pay for good choices. Research projects submitted for support were graded into alpha and beta but at present support was given for only about 70% of the alpha

DCAAAA

/ projects

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projects. This meant that 30% of good projects, and good people, were being turned down and significant opportunities were thereby being refused.

The Prime Minister said it was unsatisfactory that Britain had made such advances in basic science but had failed to develop profitable applications. Japan had followed the opposite course, though it was noted that it was now moving towards more basic research. In discussion, it was argued that a greater link between industry and research centres, particularly the universities, was necessary. The development of teaching companies, now numbering 127, was most promising. The larger British companies should undertake more research though it was recognised that the pressures of inadequate profitability had forced them to take a short term view. It was to be hoped that, as profits recovered, this situation would improve.

Your Secretary of State said that those responsible for managing the science budget were to be congratulated on having taken a number of tough decisions. In some research councils there had been very significant redundancies, the cost of which had to be borne on their budgets, in contrast to departments, where such costs were borne centrally.

Your Secretary of State said the Secretary of State for Defence had offered to improve co-operation between the science budget and research in the defence field. It was essential to follow this up urgently. Sir David Phillips said the Ministry of Defence was about to produce a booklet guiding the universities on how they could bid for defence research work. A mechanism was needed for ensuring that duplication was eliminated and that priorities between the civil and military research programmes were co-ordinated. Within the science budget there were mechanisms for ensuring that institutions that had passed their peak were scaled down or closed. Was this equally true for defence and other departmental programmes? Your Secretary of State offered to minute the Prime Minister setting out what might be done in this area, with a draft of a letter which could be sent to the Secretary of State for Defence. The Prime Minister accepted his offer and pointed out that she was still waiting for a paper from the Ministry of Defence on the military applications of space technology. She would be happy to hold a meeting with Professor Norman, MOD's Scientific Adviser. Mr. Hancock agreed to remind Sir Clive Whitmore of this.

The Prime Minister said she doubted whether Departments were able to spend their research funds effectively. Dr. Nicholson said the Rothschild contractor/customer principle had many advantages but to work effectively, it called for

/ expertise

expertise on the part of the customer which was not always to be found. He pointed out that the amount of research being commissioned directly by Departments was declining.

The Prime Minister asked about the fields in which the most exciting scientific prospects were to be found. Professor Kingman suggested new materials and low dimensional structures whose electrical properties would create opportunities for microelectronics. Sir David Phillips suggested applications of molecular biology to neurology, which could open the way to understanding about the organisation of the brain; and nuclear magnetic resonance where it might soon be possible to develop scanners capable of displaying real time pictures. The Prime Minister looked forward to continuing this discussion at the Seminar on 8 July.

The Prime Minister was disturbed about inadequate public understanding of the problem of acid rain. Dr. Nicholson said the priority was better understanding of the scientific processes involved. This was difficult to achieve as the problem straddled a number of scientific disciplines. Work had not kept pace with growing public sensitivity on the issue. It was originally thought that the problem lay principally in sulphur emissions but there was now greater emphasis on nitrogen oxides or ozone. This put the spotlight less on coal burning and more on automobile emissions. The choice between lead burn engines and catalytic converters was an important one; the latter were capable of achieving better results but only if the converters were maintained. He offered to send the Prime Minister a note on acid rain, together with a draft PQ which could be used to put the UK's position on the record.

BT/

I am copying this letter to those who attended the meeting.

Yours sincerely
Andrew Turnbull

Andrew Turnbull

Miss Elizabeth Hodkinson,
Department of Education and Science.

DCAAAA

CONFIDENTIAL FILING

David wants to wait to see how many people can attend the meeting on Environmental Pollution on 17 May. If we do not get any other refusals could you bring up this letter again and we will write to the Foreign Office ~~asking for~~ confirming a representative.

CR

13 April 1984

ECL

13 April 1984

Many thanks for your letter of 12 April regarding the meeting on Environmental Pollution on 17 May.

If we get many other refusals we may have to postpone the meeting. But assuming that we do not could you ask one of your Ministers to make himself available for 11 am on Thursday 17 May. I will of course be confirming this arrangement with you at a later date.

Caroline Ryder

Mrs Alison Walters
Foreign and Commonwealth Office

Foreign and Commonwealth Office

London SW1A 2AH

12 April 1984

Mr Barclay

?

Mrs Ryder

? EP meeting.

DMB 13/4

Dear Caroline,

Your letter of 11 April to Miss Lewis-Jones refers.

I am afraid the Foreign Secretary will, on present plans, be overseas on 17 May, but I could arrange for him to be represented if you so wish.

Yours ever

Alison

(Alison Walters)
Assistant Private Secretary

Mrs Caroline Ryder
10 Downing Street

DG

file

10 DOWNING STREET

From the Private Secretary

11 April 1984

Dear Janet,

BF

There is to be a further meeting to discuss Environmental Pollution on Thursday 17 May after Cabinet. Cabinet will start that day at 0930 hours and this meeting will commence at approximately 1100 hours.

Could you kindly let me know if your Minister does not find this convenient.

I am sending copies of this letter to the Private Secretaries to the Secretaries of State for Foreign and Commonwealth Affairs, Energy, Scotland, the Environment, Trade and Industry, Employment, the Minister of Agriculture, Fisheries and Food, the Chief Secretary HM Treasury, the Secretary of State for Transport, the PUSS, DOE (Mr. William Waldegrave MP) and to Richard Hatfield (Cabinet Office).

Yours sincerely,

Caroline Ryder

Caroline Ryder

Miss Janet Lewis-Jones,
Lord President's Office.

SUBJECT to MINISTER

CONFIDENTIAL

FILE BC Mr. Gregson R M

Mr. Pascall

10 DOWNING STREET

From the Private Secretary

5 April, 1984.

Dear John,

Environmental Pollution

The Prime Minister held a meeting today to consider the Report of the Official Committee on Environmental Pollution which was circulated under cover of a minute from Sir Robert Armstrong dated 30 March. Also before the meeting was a letter from the Private Secretary to the Lord President of the Council dated 3 April. In addition to your Secretary of State, those present were the Foreign and Commonwealth Secretary, the Secretaries of State for Employment, Trade and Industry, Energy, Scotland and Transport, the Minister of Agriculture, the Chief Secretary to the Treasury and the Parliamentary Under Secretary of State, Department of the Environment (Mr. Waldegrave).

Your Secretary of State said that there was a need both for improved presentation of the Government's stance on environmental pollution, and for substantive progress on certain issues. The areas which posed particular difficulty included acid rain, which presented a serious long-term problem in environmental management, to which there was as yet no clear scientific solution; vehicle emissions where we had so far resisted successfully pressure to adopt catalytic conversion, on the grounds that our own technology was superior; the re-processing, storage and disposal of radio-active waste; and pollution of the North Sea, where the United Kingdom was alone in the extent to which sewage sludge and other wastes were still discharged.

In discussion there was broad agreement that the Government's response to the 10th Report of the Royal Commission on Environmental Pollution would provide a useful opportunity to improve the presentation of policy. It would be right to take credit for the United Kingdom's good record in matters such as air and water pollution. In public discussion, it would be important to put across the scientific basis on which decisions had to be taken, so that the costs and benefits of alternative options could be weighed. It might well be necessary to accord greater priority to research, but the way in which existing funds were directed would also bear scrutiny. Past experience showed that research had to be started early if it was to make its proper contribution to decision making.

CONFIDENTIAL

/ It

RW

It was argued that the Official Report placed too little emphasis on the costs of stricter pollution control. Nearly all economic activity caused some pollution of the environment - the question was whether the degree of pollution was actually harmful. For this reason, the concept of "Best Available Technology" as a basis for the setting of international standards was both damaging and expensive. We were right to take advantage of our climate and topography. Accordingly, we should maintain our preference for "Environmental Quality Objectives", and for the concept of "Best Practical Means" which had been part of British law for a long time.

It was also argued, however, that we should not discount the possibility of alternative approaches in some areas where they were supported by a strong body of international opinion. The North Sea and acid rain might be examples.

Differing views were expressed on the merits of public disclosure, particularly in relation to the nuclear industry. On the one hand, it was important to keep the confidence of the industry, and avoid fuelling exaggerated fears. On the other hand, as the Royal Commission had pointed out, any unnecessary secrecy could cause acute political difficulty, if, for example, an incident occurred. Reference was made to the fate of the American nuclear industry, which had been virtually killed off by excessive environmental controls. Those who argued against nuclear power in this country believed that fossil fuels could take the place of nuclear power generation. But attention would then concentrate still more on acid rain. Counter measures were possible, but could cost in the region of £50 million per power station.

Initial consideration was given to the summary of points for Ministers at the end of the Official Report. Although firm decisions were not reached, there was support for the general policy stance set out in paragraph 51a with the qualification that the importance of cost considerations might be brought out further. The recommendations on research (paragraph 51b) should refer not only to the priority given to environmental pollution research, but also to the need for better direction of funds already available. On acid deposition (paragraph 51g) it was agreed to await the further report from officials. On vehicle emissions (paragraph 51h) it was agreed that the United Kingdom should maintain vigorously its preference for "lean burn" as opposed to catalytic convertors as a route to the reduction of nitrogen oxide emissions. On radio-active waste (paragraph 51i) it was noted that the Secretary of State for the Environment was considering the adequacy of the proposed inquiry procedures for the disposal of waste on land. The situation at Sellafield was judged to be under control, although the disadvantages of an ageing plant were becoming increasingly obvious. On pollution at sea (paragraph 51j) the meeting noted with satisfaction that the United Kingdom had secured agreement to its view that discussions at the forthcoming conference should be based on firm scientific evidence. On agriculture and the environment (paragraph 51k) no conclusion was reached, although concern was expressed on the one hand about the costs of the Wild Life and Countryside Act, 1981, and on the other about the dangers of interfering with a new financial mechanism at such a sensitive time.

/ Summing

Summing up the discussion, the Prime Minister said that, since it would probably not be possible to publish the Government's response to the 10th Report before the autumn, it was desirable to publish a statement of the Government's achievements and aims relating to environmental pollution before the Economic Summit. The Secretary of State for the Environment should now put in hand the drafting of such a statement which would be discussed by the same group of Ministers in mid-May. It might also be desirable at that meeting to consider papers on some specific issues requiring Ministerial decision around that time, for example the United Kingdom's negotiating line in the international discussions in June on acid deposition.

I am sending a copy of this letter to Brian Fall (Foreign and Commonwealth Office), David Normington (Department of Employment), Callum McCarthy (Department of Trade and Industry), Michael Reidy (Department of Energy), John Graham (Scottish Office), Dinah Nichols (Department of Transport), Ivor Llewelyn (Ministry of Agriculture, Fisheries and Food), John Gieve (Chief Secretary's Office), Joan Dunn (Mr. Waldegrave's Office, Department of the Environment) and to Richard Hatfield (Cabinet Office).

(David Barclay)

J. Ballard, Esq.,
Department of the Environment

David

Well done! I suggest altering the summing-up paragraph on the basis of the attached, for the following reasons:

- we don't want another general discussion,
- we ought to give the basis of the drafting of the pre-Summit statement to the Environment Ministers, rather than the Cabinet Office; good rhetoric does not usually emerge from Official Committees;
- I want to have a free hand in deciding which other papers and from which sources should come to the mid-May meeting;

/over

- I have said "autumn" rather than "end of Session" advisedly; although they seemed to contemplate the reply slipping beyond the end of the Session (which DoE interpret as prorogation ie end October), the Government is committed to the House to publication "before the end of the Session".

PG
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X

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10 DOWNING STREET

Mr. Gregson

PG
4/4

For any comments please.

With the compliments of

David Barclay

5 April 1984

CONFIDENTIAL

10 DOWNING STREET

From the Private Secretary

5 April, 1984.

Environmental Pollution

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/ It

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It was also argued, however, that we should not discount the possibility of alternative approaches in some areas where they were supported by a strong body of international opinion. The North Sea and acid rain might be examples.

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/ Summing

Summing up the discussion, the Prime Minister said that a further meeting would be necessary in about one month's time to consider further the issues covered by the Official Report. The Secretary of the Cabinet should arrange for a further paper to be circulated beforehand. Although it might not be possible to publish the Government's response to the Royal Commission's 10th Report before the end of the session, work should continue on the preparation of a statement of the Government's record on environmental pollution which could be issued before the Economic Summit.

I am sending a copy of this letter to Brian Fall (Foreign and Commonwealth Office), David Normington (Department of Employment), Callum McCarthy (Department of Trade and Industry), Michael Reidy (Department of Energy), John Graham (Scottish Office), Dinah Nichols (Department of Transport), Ivor Llewelyn (Ministry of Agriculture, Fisheries and Food), John Gieve (Chief Secretary's Office), Joan Dunn (Mr. Waldegrave's Office, Department of the Environment), and to Richard Hatfield (Cabinet Office).

David Barclay

J. Ballard, Esq.,
Department of the Environment.

cc/DP

W.0272 PA 5/4 5 April 1984

MR BARCLAY

ENVIRONMENTAL POLLUTION

The Prime Minister asked two questions at this morning's meeting which I was unable to answer fully:

(1) How much public money is being spent on research into environmental pollution? The EP paper estimates £29m, Treasury 'more than £200m'. The Annual Review of Research carried out by my Secretariat can be used to estimate the correct figure and I will make this available before the next Ministerial meeting.

(2) Why has there been insufficient research on environmental pollution despite the substantial funding of NERC? This is partly a matter of NERC scientific priorities not reflecting national needs and partly a reduction in DoE commissioned research from NERC. Again I shall prepare a fuller statement for the next meeting.

In addition I think the next meeting would be helped if there was a concise and accurate statement of the technical position on each issue and a concise summary of the Royal Commission's recent report. I am having both of these prepared before the next meeting.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

cc: Mr Hatfield
Mr Pascall
Mr Gregson

SeNO
DP

W.0258 4 April 1984

PRIME MINISTER

ENVIRONMENTAL POLLUTION

The report of the Official Committee on Environmental Pollution (EP) should be a matter of concern for Ministers. It shows that the UK is lagging in certain areas of environmental protection, is clinging to some outmoded techniques and principles, is being harried by other nations on several types of pollution and responding defensively and hesitantly, and is not even getting credit for its achievements in environmental improvement.

2. The causes of the problem are:

(a) too low a priority for environmental protection matters, not only in the Department of Environment but also in other Departments which sponsor the polluters;

(b) too little anticipation of the occurrence of environmental problems so that inadequately researched ad hoc measures have sometimes had to be adopted with minimum opportunity for Ministerial discussion of policy;

(c) too little research and development carried out too late, especially in the private sector and the publicly-owned utilities.

3. The tenth report of the Royal Commission on Environmental Protection is an excellent document, far more understanding in its treatment of the British approach to environmental protection and ~~are~~ far more constructive in its recommendations than Government might have anticipated. It provides a heaven-

sent opportunity for Government to make a fresh start in its environmental protection policies and to develop a strategic approach which is more open, positive and forward-looking. The general thrust of the Royal Commission report should be welcomed without reservation and the detailed recommendations accepted unless there is real evidence from Departments for a better alternative solution. This message should go out loud and clear before the London Economic Summit and the June round of European environmental meetings, even if a full response, regrettably, seems to be impossible before the end of July.

4. Environmental pollution and protection have a strong science base. But the science is complex, difficult and may take a long time to research. Consequently:

(a) there will be misrepresentation of the science by selection from the research results giving opportunities for mischief by pressure groups and chicanery by other nations;

(b) action has to be taken before there is scientific certainty but not before sensible judgements of a reasonable volume of scientific evidence can be made;

(c) research into the causes of pollution must lead the start of the problems by many years so that the technology of protection or prevention can be developed in time.

5. The need therefore is for better and earlier research and development by industry. The principle "The polluter pays" is well-established in prevention hardware but the polluter must also pay for research and development on the causes, effects and prevention of his pollution. Government can use its statutory powers to encourage this R&D to be done by industry. Government also needs to give a higher priority to its own R&D in environmental protection so that Ministers can be better informed of the technical basis of various policy options.

6. In summary:

(a) Government should welcome the Royal Commission report and accept some of the major recommendations before the London Economic Summit. Several recommendations, such as unrestricted access to data, adoption of the 'lean burn' solution to vehicle emissions and pilot plant studies of reduction of power plant emissions, can be accepted without undue expense or worry about remaining scientific uncertainty. Public confidence and our international position would be greatly improved by these steps.

(b) Departments should give a higher priority to environmental protection matters so that Ministers can choose policy options in good time within a soundly based overall strategy. Government could then lead nationally and internationally rather than be harried and bullied by pressure groups and other nations.

(c) Government should use its statutory and regulatory powers to ensure that industry carries out better and earlier research and development into causes, effects and solutions of its pollution problems.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

cc: Sir Robert Armstrong

Cabinet Office
4 April 1984

cc Mr Turnbull
Mr Pascall

PRIME MINISTER

ENVIRONMENTAL POLLUTION

It has been suggested that I put in a note on the presentational angle for your discussion tomorrow.

I think it undeniable that:

i. we have made too little of our successes in this field;

ii. we allow too much initiative to rest with critics or pressure groups; and

iii. we allow ourselves too often to be put in the international dock - eg over acid rain (about which I remain somewhat sceptical).

What the papers suggest - to a greater or lesser degree of caution - is a more positive approach, starting with a statement immediately before the Economic Summit, followed up by a very full account of the British approach by way of reply to the Royal Commission before, I hope, the Summer Recess.

But what the papers do not say is how we sustain a positive presentational approach given that the subject crosses a number of Departmental boundaries.

Of course, any presentational programme depends on policy decisions. But there is enough achievement to sustain a more positive presentational stance in the short period before the results of decisions would be seen in a pre-Summit statement. Thereafter the objective would be positively to explain the Government's approach and achievements and to relate individual decisions, as they are announced, to overall policy.

None of this, however, is likely to happen unless machinery is established to make it happen, because of the debilitating effects of divided Departmental responsibility. If each Department is left to its own presentational devices the effect is reduced and we often travel only at the pace of the slowest or most accident prone.

My strong advice is that if we wish to improve things specific presentational arrangements should be made on the lines of the CND and local government reform campaigns. In each of these cases presiding Ministerial responsibility has been identified and this political control has been supplemented by official information arrangements in which I have been included to provide a No 10 input and more important, drive. I would suggest the same for environmental pollution. (This would for me have the bonus of giving me a locus on nuclear waste presentation of which I have 5 years' experience and where coordination is not our strongest card).

As for policy, the problem seems to me to be one of achieving a sense of urgency and a positive and more open approach to presentation with a sound, scientifically based but internationally compatible system of control.

I hope this is helpful.

BERNARD INGHAM
4 April 1984

cc JP

P.01265

PRIME MINISTER

Environmental Pollution

FLAG A

This meeting arises from Mr Turnbull's letter of 24 January expressing your concern about the Government's defensive and reactive stance on environmental pollution matters. The report by the Official Committee on Environmental Protection (EP) circulated to you and other Ministers under cover of Sir Robert Armstrong's minute of 30 March is intended to enable Ministers to review the Government's policy on environmental pollution and the scope for improving its presentation both generally and in relation to the main specific issues likely to come up in 1984.

FLAG B

MAIN ISSUES

2. It may be convenient to take as the agenda for the meeting the "Summary of points for Ministers" in paragraph 51 (pages 19-23) at the end of the report. For the purpose of organising the discussion it may be best to group the items as follows:

FLAG C

- general issues of policy and presentation; (items a. - e.)
- the timing of major presentational initiatives; (item f.)
- specific issues. (items g. - k.)

General policy and presentation

3. In brief the report is saying:

i. The substance of our policy is broadly right. We must continue to weigh costs and benefits, on the basis of proper scientific evidence. We should not move to the Uniform Emission Standards approach favoured in Europe, which would prevent us from taking advantage of our situation as a wet and windy island, and would impose unjustified cost burdens on our economy. Likewise, we should not adopt the European approach of using the "best available technology" to control emissions irrespective of cost.

ii. Nevertheless we should be readier to minimise releases in water and on land of the most toxic substances (for example mercury, cadmium, lead or persistent biocides), developing the approach of "best practicable means", used for air pollution in the UK since the 1860s, and more recently for radioactive wastes.

iii. We should explain the basis of our policy better as a way of seeking the "best practicable environmental option", taking account of economic, scientific and social factors.

iv. We should improve the credibility of our policy by directing more Government expenditure (within existing programmes) to research on environmental pollution and by encouraging more research effort by industry.

v. We should improve our tactics in international

discussions by putting forward alternative positive proposals of our own rather than merely obstructing the proposals of others.

vi. We should make more information publicly available, subject to the minimum number of exceptions on grounds of national security and commercial sensitivity.

vii. We should seek more credit for past achievements and current programmes of action on the lines suggested in the Annex to the report.

4. You will wish to establish whether the meeting is prepared to endorse a general approach on these lines. The Foreign and Commonwealth Secretary might wish to argue for going further in the direction of adopting the European approach to Unified Emmision Standards, but the economic departments would be opposed to that. It would not be fruitful to spend too long on the more philosophical aspects of environmental policy. In the real world it will all turn on how the difficult specific issues like acid deposition and radioactive wastes are handled. It would however be useful to ascertain whether those present at the meeting consider that the points in the Annex provide a helpful basis for improving presentation.

Timing of major presentational initiatives

5. The timing and content of the reply to the Tenth Report of the Royal Commission on Environmental Pollution, published on 22 February, will have a major effect on how the Government's attitudes are perceived publicly. It is common ground that it would not be possible to publish a sufficiently positive and substantial reply to the Royal

Commission before July at the earliest, because the report covers a wide range of important issues. The meeting will need to consider:

- whether the target date for the reply should be July rather than October;
  (the latter will probably be the timing unless a special effort is made not just by the DoE but all the other departments involved)

- whether, in addition to the reply to the Royal Commission, there should be a major presentational initiative before the summer, eg a short statement of environmental achievements and aims for publication in, say, late May in the run up to the London Economic Summit.

Specific issues

6. In respect of the specific items at g. - k. of the summary, it is mainly a matter at this stage of noting that there are some difficult issues likely to come up over the next few months for example:

- acid deposition, where the proposed EC Large Plant Directive would require expenditure at power stations (as well as other major industrial plants) which would eventually, after about 10 years, add 5 per cent to electricity costs;

- disposal of radioactive waste on land, where the Secretary of State for the Environment may be making proposals about the handling of the public enquiries relating to the sites at Billingham and Elstow.

The report is not asking for decisions on most of these matters at this stage because more work has to be done before options can be put before Ministers.

7. There are however two issues where Ministers are invited to give a specific steer:

- whether further measures are needed to restore public confidence in Sellafield;

- whether the working of the Wildlife and Countryside Act 1981 in relation to farmers is satisfactory.

On both of these items the Secretary of State for the Environment may express concern about the current position.

8. On Sellafield it may be argued that the publication of the Black Report in May will require the Government to promise not merely (as it has recently done) that there is a plan for meeting "the highest standards which are reasonably achievable" but a plan for matching the best technical standards achieved elsewhere in the world. The Secretary of State for Energy and the Chief Secretary are likely to argue that any decisions on this must await advice on costs and benefits referred to in paragraph 34 of the report.

9. On the Wildlife and Countryside Act 1981 there is concern about the payments to farmers of compensation for forgoing improvements (eg land drainage) harmful to conservation. The Minister for Agriculture is likely to say that it would be premature to conclude that the arrangements need to be changed.

Next steps

10. Depending on the course of the discussion, you will wish to consider what arrangements should be made for further Ministerial consideration of these matters. The best way of ensuring that environmental pollution continues to be accorded sufficient priority may be for you to convene a further ad hoc meeting at an appropriate time. A number of issues may be coming to a head in late May for example:

- the issue of a short statement of UK environmental achievements and aims (if this is agreed to be worth doing);

- the UK line on acid deposition for the European discussions from June onwards;

- assurances to the public about the Sellafield discharges in the light of the Black Report;

- the handling of the public enquiries about land disposal sites for radioactive wastes.

A further ad hoc Ministerial meeting in late May might therefore be timely.

HANDLING

11. The general discussion on policy and presentation might begin with comments from the Secretary of State for the Environment and the Parliamentary Under Secretary of State (Mr Waldegrave). The Lord President may have some views on presentation and publicity. The Foreign and Commonwealth Secretary may wish to comment on the handling of international discussions.

12. When you come to the specific items you will wish to bear in mind that the Ministers mainly concerned, in addition to the Environment Ministers, are:

acid deposition:	Secretary of State for Energy
vehicle emissions:	Secretary of State for Transport
radioactive wastes:	Secretary of State for Energy and Minister of Agriculture
pollution at sea:	Minister of Agriculture
agriculture and the environment:	Minister of Agriculture.

CONCLUSIONS

13. It would be helpful if the meeting were to take note of and endorse the points at paragraph 51a.-k. of the report and in particular to reach conclusions on:

i. whether the target date for the publication of the reply to the Royal Commission Report should be July or the autumn;

ii. whether there should be a short statement of UK environmental achievements and aims in late May or thereabouts;

iii. whether further measures are likely to be necessary to restore public confidence in Sellafield;

iv. whether anything needs to be done now about the working of the Wildlife and Countryside Act 1981 as it affects farmers.

PG

P L GREGSON

3 April 1984

CONFIDENTIAL

cc DP

PRIVY COUNCIL OFFICE
WHITEHALL, LONDON SW1A 2AT

3 April 1984

Dear David,

ENVIRONMENTAL POLLUTION

The Lord President has seen the Report of the Official Committee on Enviromental Pollution, which was sent to the Prime Minister under cover of Sir Robert Armstrong's minute A084/1021 of 30 March. He will be unable to attend the meeting on 5 April at which the Report is to be discussed.

The Lord President accepts that it is important in presentational terms for the Government to be seen to take a lead on environmental issues, but hopes that it will be possible for action to be concentrated in specific areas where it will gain widespread acceptance. He acknowledges that the Government must, for example, face up to the need for the agricultural industry to be more receptive to the requirements of the environment, and face up to the road haulage industry on the question of vehicle emissions. But both these industries are powerful pressure groups, and the Lord President is anxious that the Government should not too readily give firm pledges for action in areas where controversy will inevitably arise, and should proceed only after the most careful discussion.

I am sending copies of this letter to Len Appleyard (Foreign and Commonwealth Office), Michael Reedy (Department of Energy), John Graham (Scottish Office), John Ballard (Department of the Environment), Callum McCarthy (Department of Trade and Industry), David Normington (Department of Employment), Dinah Nichols (Department of Transport), Robert Lowson (MAFF), John Gieve (Chief Secretary's Office), Joan Dunn (Mr Waldegrave's Office), and to Richard Hatfield (Cabinet Office).

Yours ever,

Janet Lewis-Jones.

JANET A LEWIS-JONES
Private Secretary

David Barclay Esq

CONFIDENTIAL

Env Affairs Pollution.
Sept 79

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).

RTA

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 airs or waters, 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 enviironmental 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 emmissions
- 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 shoud 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 (NOx) 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 assocated 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) stresssed 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 rdioactivity 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 depostion 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

ANNEX

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.

CDB

POLICY UNIT

PRIME MINISTER

Environmental Pollution

Our paper last year stressed the serious policy and political difficulties which we are encountering in this area.

The review by officials which has taken place since then was marked by a lack of urgency and a defensive reaction by most Departments concerned.

We are rapidly losing public confidence and we must take steps to regain the initiative. Your meeting on Thursday provides an ideal opportunity.

The official report provides a basis for a positive programme but does not go nearly far enough. We need to identify a selective package of positive measures which meet genuine concerns about aspects of our policy and presentation.

General Policy Stance

The UK is continuously out of step with the rest of the EEC on the use of Environmental Quality Objectives (EQOs) versus fixed emission limits.

Although there is some merit in this approach, there are some classes of industrial pollutants where reductions in absolute terms are desirable on environmental grounds. Obvious examples are toxic substances which are persistent and bioaccumulative. Less obvious are pollutants which cross international frontiers.

We recommend

1) that Departments should identify those classes of pollutants where absolute reductions are desirable.

/Research

Research

We need to move closer to the concept of "the polluter pays". Industry should assume a greater responsibility for research into cause and effect as well as in meeting quality requirements.

We recommend

2) that Ministers should be presented with positive proposals on how to make the polluter pay and assume greater responsibility for research into the consequences of his pollution.

Secrecy

Departments claim that the general approach is already to eliminate unnecessary secrecy. The Royal Commission effectively demonstrates that this is not the case.

We recommend

3) that the Government should accept the proposals made by the Royal Commission and take effective steps to implement them. Legislation is required in some cases.

Reply to the Royal Commission Report

The Economic and European Summits in June provide an excellent opportunity to respond positively to certain selected recommendations in the Tenth Royal Commission Report.

We recommend

4) that the Government should respond to selected recommendations, e.g. secrecy, before June and that the full proposal should be published before the Summer Recess.

Acid Rain

It is no longer enough for us to deflect calls for action with the argument that more research is needed to understand the problems. A cost-effective package can be drawn up which does not cost billions of pounds but would go some way to meeting criticism.

It is symptomatic that we have not yet prepared an assessment of the costs of various options for reducing emissions. This work must be completed as soon as possible.

We recommend

5) that Departments should provide the information needed for Ministers to take positive decisions in May.

Vehicle Emissions

The "clean burn" engine provides an excellent opportunity for a major initiative to follow up and commitment to removing lead from petrol. Cleaning up car exhausts during your Administrations would be a substantial achievement.

We recommend

6) that policy proposals on "clean burn" engines should be prepared for a major initiative on cleaning up car exhausts.

Radioactive Waste (Sellafield)

This is a genuinely worrying area. We must do all we can to meet public concern.

/For

For Sellafield, new stringent authorisations must be announced urgently. Pressure is mounting for a complete shut down at the plant while Departments argue about the need for cost-benefit assessments. We have no choice but to act now.

We recommend

7) that we should commit ourselves to making Sellafield as good in environmental terms as any in the world within five years.

Radioactive Waste (Disposal)

We are faced with a basic dilemma on the disposal of both low-level and intermediate-level nuclear wastes.

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 justifications.

Disposal on land is generating public concern. It may prove necessary to abandon the principle of safe disposal in favour of a policy of storage under surveillance. Appropriate treatment could then take place later when technologies are further advanced.

We recommend

8) that Departments should provide a review of all the options open to the Government including the implications of accepting that a safe means of disposal does not exist.

Pollution at Sea

The official conclusions are too defensive.

/We recommend

We recommend

9) that the difficult long term issues should be addressed in formulating our policy in advance of the North Sea Conference.

Agriculture and the Environment

This subject is likely to cause us some of our greatest political embarrassments unless we adopt a consistent and politive approach.

The Wildlife and Countryside Act is a particular example. It is leading to huge hand-outs for farmers to do nothing at great cost to the taxpayer. In many instances, farmers are being subsidised for not being subsidised. Recent cases range from annual payments of £100,000 to £360,000. The annual bill is likely to escalate at an alarming rate.

We recommend

10) that the Wildlife and Countryside Act is urgently reviewed.

Straw burning, pesticides, housed livestock, nitrate levels and fertilisers are all likely to be subjects of growing public concern.

We recommend, with the exception of pesticides where statutory regulations are being considered by OD(E) on 12 April

11) that Departments prepare a range of options open to Ministers before existing policy is endorsed.

/Legislation

Legislation

The Pollution Bill scheduled for 1984/85 is largely an essential administrative bill on the protection of food and the marine environment. It will, however, focus public attention upon our policy for dumping at sea.

Furthermore, some of the issues discussed above could require primary legislation. One possibility is the Wildlife and Countryside Act.

We recommend

12) that the need for pollution legislation is considered in the context of the Pollution Bill proposed for 1984/85.

Economic Summit

The Government needs a clear policy line on several of our most vulnerable areas by the end of May in order to meet a series of international deadlines.

This provides an ideal oppotunity to raise our profile on environmental matters immediately before the Economic and European Summits in June.

We recommend

13) that you hold a second meeting in May to consider a positive programme of action on acid rain, radioactive waste, follow up to the Royal Commission Report, vehicle emissions and the Wildlife and Countryside Act.

/14) that you

14) that you consider whether you wish to chair a review of environmental issues at regular intervals.

Conclusion

There is considerable scope to regain the initiative and restore public confidence in pollution matters.

DLP.

DAVID PASCALL

30 March, 1984

File

Meeting fixed for 5 April AT 7/3

MR TURNBULL

5 March 1984

ENVIRONMENTAL POLLUTION

The Official Committee on Environmental Protection (EP) finally met on Friday to review environmental issues. Although some progress was made, further work is required before a suitable paper for the proposed Prime Minister's meeting can be produced.

The attitude of the departments represented on EP was largely predictable and generally defensive. Even the Department of the Environment which produced a reasonable analysis of the problems failed to offer adequate solutions.

I emphasised the importance which the Prime Minister attaches to this subject and expressed the hope that the Ministerial meeting can take place in about a month's time.

In order to follow this up and imbue Departments with an appropriate sense of urgency, we recommend that a date for the Prime Minister's meeting should be set now and communicated to Departments. Ideally the meeting should take place in early April and certainly before Easter.

The Cabinet Office have now taken over the drafting of the paper for the Prime Minister's meeting and would regard a firm date as a helpful step. It will be important that the paper presents clear policy and presentational options based on a programme of action. The underlying conflicts which occasionally surfaced during the meeting will have to be brought out explicitly.

The Prime Minister's meeting will need to review policy and the scope for improving presentation. As well as the need to restore public confidence and to adopt a positive approach in certain selected areas, there are a number of important international dates in the environmental calendar this year. The UK will require a clear position on a range of issues including acid rain, car exhausts, nuclear waste and dumping at sea by June.

The Government has also to respond to the recent Tenth Report of the Royal Commission on Environmental Pollution. It was suggested at EP that this response, coupled with a positive initiative on the environment, could be timed to coincide with the Economic Summit in June.

All of this emphasises the importance of the Prime Minister's meeting. I shall be advising the Cabinet Office during the coming weeks. If EP continues to adopt a defensive approach, the Policy Unit will be well placed to give appropriate advice to the Prime Minister.

DLP.

DAVID PASCALL

NBPM
AT
23/2

cc DP

W.0167 23 February 1984

MR TURNBULL, NO 10

PRIME MINISTER'S DISCUSSION WITH SIR JOHN MASON

I gather from Sir John Mason that his discussion with the Prime Minister when she was admitted to the Royal Society ranged widely but as far as acid deposition is concerned, he made the following points:

(a) There is substantial doubt on the validity of some of the scientific evidence relating to acid rain eg:

(i) the seasonal variation of acidity of rain does not appear to correspond with the seasonal variation of sulphur dioxide emissions;

(ii) sulphur dioxide emissions from power stations peaked about 10 years ago but the acidity of lakes in Scandinavia has continued to increase;

(iii) one of the largest "increases" in measured acidity coincided with a change in measurement technique.

(b) There are increasing indications that nitrogen oxides are as important/more important than sulphur dioxide as the primary source of acid deposition. Also that photochemical oxidants which are mainly emitted from vehicle exhausts may be the key in determining the rate of deposition of gaseous oxides pre-existing in the atmosphere.

(c) In the face of this scientific uncertainty, panic actions intended to reduce acid deposition could be expensive and ineffective.

I should add that Sir John Mason is Director of the recently announced Royal Society/Scandinavian National Academies' scientific study on acid deposition and is a noted scientific 'hawk' - his views might not be shared by the Chief Scientist of the Department of the Environment or by the Chairman of NERC for example. Nevertheless he is a very distinguished atmospheric scientist and his views do carry some weight.

RBN

ROBIN B NICHOLSON
Chief Scientific Adviser

23 February 1984

Pa DMB 21/2

CONFIDENTIAL

Prime Minister (2): To note that the Royal Commission's report will be published on Wednesday. X and Y will be especially controversial. DMB 20/2

MR BARCLAY

ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION: TENTH REPORT

The Royal Commission's Tenth Report, "Tackling Pollution - Experience and Prospects", will be published on Wednesday, 22 February.

The report is a wide ranging study of experience in pollution control over the past decade and of priorities for the future. Particular emphasis is given to atmospheric pollution and to pollution of estuaries, coastal waters and the North Sea.

The report makes a series of recommendations which will stimulate the current debate on our handling of pollution issues and provide the various pressure groups with plenty of scope to embarrass the Government.

These include:

- It is essential to reverse a decreasing emphasis on environmental protection in the UK, characterised by significant reductions in the resources available for research, monitoring and forward thinking. The UK should play a more positive role in Europe.

- The need for unnecessary secrecy to be removed with a presumption in favour of unrestricted access for the public to information on environmental pollution. Provision for secrecy only in those circumstances where a genuine case for it can be substantiated.

X - A legislative ban on straw burning to take effect in five years' time.

Y - The UK should reappraise its stance on irretrievable discharges to the sea of toxic substances which are unarguably persistent and bioaccumulative.

- Improvements in the undesirable degree of sewage contamination on many of our beaches.

- Further study on the inputs and effects of contaminants to the Irish Sea.

- An early date, at least within five years, should now be set by which all tipping of colliery waste on the foreshore of the United Kingdom must come to an end.

- High priority should be given to research on acid deposition, in particular on the causes and effects, on the interactions with other pollutants, and on remedial action.

- The CEGB should introduce on a pilot basis over the next five years certain of the sulphur dioxide abatement options that are already available.

- Various proposals to improve the co-ordination and machinery for implementation of pollution control measures.

Nevertheless the report is a thorough and impressive piece of work and we shall need to consider our response carefully. Patrick Jenkin is proposing to make a statement next week which will welcome the report and promise a constructive Government response by the end of the session.

All of this emphasises the points we made to the Prime Minister in our earlier paper on environmental pollution on the need to review both our policy and its presentation.

The Official Committee on Environmental Protection (EP) is scheduled to meet on 2 March and we hope that the Prime Ministerial meeting referred to in Andrew Turnbull's letter of 24 January can take place shortly afterwards. The Royal Commission's report will be important background for this meeting.

DLP.

MG

DAVID PASCALL
20 February 1984

Pa
Dawe
20/2

Mr Pascall

You may like to see.
DoE do not think there is any need to trouble the PM with this. Agree?

Dawe
20/2

Royal Commission on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212 5600
Switchboard 01-212 3434

Your reference

Our reference RC/93/2

F E R Butler Esq
Principal Private Secretary to
the Prime Minister
10 Downing Street
LONDON
SW1

17 February 1984

Dear Butler

TENTH REPORT OF THE ROYAL COMMISSION

... Further to my letter of 7 February, I now enclose an advance copy of the Commission's Tenth Report, which is to be published on Wednesday 22 February.

I am sending copies of this letter and of the Report to the recipients of my previous letter.

Yours sincerely
Tom Radice

T E RADICE
Secretary to the Commission

Env. Affairs: Royal Commission on Env. Pollution Sept. 79.

010

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 Andrew

ENVIRONMENTAL POLLUTION

file with FEAB

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 Reidy

M F REIDY
Private Secretary

Env. Affairs : Env. Pollution Sept. 79

CONFIDENTIAL

NBPM AT 13/2

Mr. Turnbull

CABINET OFFICE

~~Central Policy Review Staff~~

70 Whitehall, London SW1A 2AS Telephone 01-233 7089

Mr Robin Butler
10 Downing Street
London SW1

9 February 1984

Dear Robin,

TENTH REPORT OF THE ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION

I have seen a copy of the letter from Radice to you dated 7 February about the forthcoming Tenth Report of the Royal Commission on Environmental Pollution. You might wish to know that the proposal in paragraph 6.13 that an assessment should be made of the sources and cures of pollution from the newer industries is already under active consideration by ACARD. ACARD recognised this problem independently from the Royal Commission but in the last few weeks we have had the benefit of discussions with Sir Richard Southwood, during which he disclosed to us in confidence the comments made in paragraph 6.13.

It is likely that ACARD will set up a working group to study this particular aspect of pollution since it relates so strongly to previous ACARD reports of new technologies. However a decision whether or not to go ahead with this study will only be made at ACARD's meeting on 7 April.

Copies of this letter go to other recipients of Radice's letter.

Yours ever,

Robin

ROBIN B NICHOLSON
Chief Scientific Adviser

CONFIDENTIAL

Env Affairs Sept 79

Env. Pollution

010

Mr. Ingham

Pascall
You might like to get hold of a copy of this for your work on pollution
AT 8/2

Royal Commission on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212 5600
Switchboard 01-212 3434

Your reference

Our reference RC/93/2

F E R Butler Esq
Private Secretary to the
Prime Minister
10 Downing Street
LONDON
SW1

7 February 1984

Dear Butler

TENTH REPORT OF THE ROYAL COMMISSION

You may wish to inform the Prime Minister that the Royal Commission's Tenth Report, 'Tackling Pollution - Experience and Prospects' will be sent to the Home Secretary at the beginning of next week for submission to Her Majesty the Queen. It is envisaged that Sir Richard Southwood will hold a press conference to mark the publication of the Report on the morning of Wednesday 22 February.

The Tenth Report is the outcome of a wide-ranging study of experience in pollution control over the past decade and of priorities for the future, and makes a variety of recommendations, mainly in relation to the administration of pollution control (particularly in the context of EC membership) and on specific problems within the general fields of atmospheric, estuarine and coastal pollution.

Copies of this letter go, for information, to Rawsthorne (Home Office), Hatfield (Cabinet Office), Heyhoe (Lord Privy Seal's Office), Kerr (Treasury), Ballard (Environment), Dinah Nichols (Transport), McCarthy (DTI), Reidy (Energy), Godber (DHSS), Llewelyn (MAFF), Fall (FCO), Graham (Scottish Office), Jones (Welsh Office) and Lyon (NIO).

Yours sincerely
T E Radice

T E RADICE
Secretary to the Commission

CONFIDENTIAL

CC NO

Prime Minister ②

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

AT 31/1

2 MARSHAM STREET
LONDON SW1P 3EB
01-212 3434

My ref:

Your ref:

31 January 1984

Dear Andrew

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 on Pollution

Sep 79

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

CONFIDENTIAL

FCO FM
CDP
cc MOD
SO

10 DOWNING STREET

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

CONFIDENTIAL

JC

FCO RM
CDP
cc MOD
SO

10 DOWNING STREET

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.

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Yours sincerely
Andrew Turnbull

(Andrew Turnbull)

J. Ballard, Esq.,
Department of the Environment

JC

→ GR Pl type attached letter
bc DP.

CONFIDENTIAL

Note: At the Royal Society the other day I sat next to Professor Jefferson (formerly of the Tech. Office) who had some most interesting views on acid rain. MT

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?

Yes - but let them get a letter from the Rules Bit first MT

AT

18 January, 1984.

CONFIDENTIAL

MR TURNBULL

17 January 1984

INDUSTRIAL 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.

DLP.

DAVID PASCALL

Ref.A084/159

MR TURNBULL

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.

RTA

16 January 1984

ROBERT ARMSTRONG

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

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

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.

File

bc: 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

(4)

PRIME MINISTER

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 Committee under Bernard? D.E.S.? It lacks initiatives.

9 December 1983

CONFIDENTIAL

cc BI ✓ DP

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 ahd 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 Sub-Committee of E to give DoE a continuing forum in which to raise these questions at a level which reflects their true political importance.

Yes mt Note for R.C.

FM

FERDINAND MOUNT

CONFIDENTIAL

PRIME MINISTER

7 December 1983

INDUSTRIAL POLLUTION: PUBLIC CONCERN AND GOVERNMENT POLICY

The 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 1983

INDUSTRIAL POLLUTION: THE ISSUES

1. 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 CEGB 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 CEGB 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

From Professor Sir Hans Kornberg FRS

Environmental Affairs

Royal Commission
on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212 8710
Switchboard 01-212 3434

Your reference

Our reference
RC/91/2

21 October 1981

Dear Prime Minister,

I wrote to you earlier this month to give you the main findings of the Commission's study of oil pollution of the sea. The Eighth Report, that records these findings, has now been published and I have pleasure in sending you a copy of it.

Kind regards

Sincerely yours

H. L. Kornberg

The Rt Hon Margaret Thatcher MP
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Your reference

Our reference RC/91/2

20 October 1981

Dear Mr Whitmore

... I enclose in advance of publication at 10.00 a.m. tomorrow, Wednesday 21 October, a copy of the "Confidential - Final Revise" of the Commission's Eighth Report, as laid before Parliament today and issued under "embargo" to lobby correspondents.

... Copies of the "Confidential - Final Revise" are also being sent today to those on the attached list.

Yours sincerely

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Secretary

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Environmental Affairs: Jul
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10 DOWNING STREET

From the Private Secretary

12 October 1981

In the absence of the Prime Minister in Blackpool, I am writing on her behalf to acknowledge your letter of 9 October about the publication of the Eighth Report of the Royal Commission on Environmental Pollution.

I will bring this to her attention as soon as she returns, and I know that she will be grateful for this advance notice. I am sure she will agree that this Report prepared by the Commission under your Chairmanship will be of great value to the Government in dealing with the many aspects of marine oil pollution, and would want me to say once again how grateful she is for all the work you have done as Chairman of the Commission.

W. F. S. RICKETT

Professor Sir Hans Kornberg, FRS

Ptb

cc Press Office

Royal Commission
on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212
Switchboard 01-212 3434

Your reference

Our reference RC/91/2

The Rt Hon Margaret Thatcher MP
Prime Minister
10 Downing Street
LONDON
SW1

9 October 1981

Dear Prime Minister,

PN 16/10

I am writing to inform you that the Royal Commission's Eighth Report is to be published on 21 October 1981. The Home Secretary is making arrangements to present the Report to Her Majesty and to lay it before Parliament.

The Report deals with oil pollution of the sea. The Commission investigated this subject at the request of the previous Government; the request reflected concern about the environmental threat posed by tanker accidents off UK coasts (prompted, in particular, by the Amoco Cadiz disaster of March 1978) and about the adequacy of the arrangements made to deal with such emergencies. We recognised at the start that the problem of large accidental spillages must be seen in perspective; while such spills are dramatic in their effects, a much greater total quantity of oil reaches the sea from routine discharges. Accordingly, the terms of reference for our study required us to consider the effects of routine, as well as accidental, discharges and the means available for controlling such discharges.

Our study thus covers a wide field. The main topics we considered, and our main conclusions, are as follows:-

(i) The effects of marine oil pollution. Although oil has adverse effects on many marine organisms, we conclude that oil spills are unlikely to cause any long-lasting damage to the marine environment; and that oil pollution generally does not constitute a chronic threat to the marine ecosystem or, indirectly, to man. However, major spills can cause serious local damage, especially to amenity, fisheries and seabirds.

(ii) Discharges from land-based sources. Most oil reaching the sea comes from such sources. We are broadly satisfied with the controls that apply to these discharges although we again stress the importance we attach to implementation of Part II of the Control of Pollution Act 1974.

(iii) Offshore oil developments. Our chief concern is with the risk of accidental spillages (especially from "blow-outs") at oil installations close to the shore. We consider that there may be areas where oil exploration and production should not be permitted on environmental grounds and we recommend improved arrangements for consultation to identify such areas. We also recommend that licensees should provide environmental impact studies for oil production operations near the coast. The contingency arrangements for dealing with spills at such sites should be reconsidered.

(iv) Tanker accidents. The prevention of tanker accidents is of first importance; measures to this end call generally for international agreement. However, we consider that in some circumstances regional action would be justified to impose standards in advance of full international agreement. We attach importance to collective action by West European States (especially through the exercise of port state powers) to deal with the problem of sub-standard tankers. We recommend that the Government take immediate action to extend the UK territorial limit to 12 miles. We are concerned about the state of hydrographic survey of waters round the UK in relation to the needs of large tankers and we recommend increased resources for such surveys as a matter of urgency. We are not satisfied about the adequacy of current arrangements for intervention to deal with a casualty at sea that threatens serious pollution and we recommend that these be reconsidered.

(v) Discharges from vessels during operations. Deliberate and illegal discharges are a major cause of coastal pollution and of seabird mortality; there are great difficulties in the enforcement of the relevant international standards. We stress the importance of adequate port reception facilities for oily wastes. We conclude that round-the-clock aerial surveillance to detect illegal discharges would not be cost effective but that use of this technique should be kept under review, especially in the context of co-operative arrangements between West European States. Further consideration should be given to the possibility of provisions in UK law to facilitate proceedings in respect of offences by foreign ships.

(vi) Dealing with oil spills. Major oil spillages are bound to occur and contingency arrangements are needed to deal with them. We conclude that the present arrangements will not ensure the rapid and expert action that is essential; the response to a major spill should be conducted as a single co-ordinated operation, embracing action at sea, in in-shore waters, and on the land.

We consider that for such emergencies central Government (acting through a suitably strengthened Marine Pollution Control Unit within the Department of Trade) should assume control of counter-pollution operations as a whole, and that statutory powers would be needed to support the Unit in this role. A corollary of our proposal is that the Government should initially meet the exceptional costs of dealing with such accidents, pending compensation through the established machinery. Policy regarding the use of dispersants to treat oil at sea requires review; there has been a misplaced emphasis on the effectiveness of these chemicals. More attention needs to be given to techniques for dealing with oil on the shore and to the problem of disposal of oily wastes.

As you noted in your very kind letter to me of 29th June, my term of office as Chairman of the Royal Commission has now ended. I trust that this second report prepared by the Commission under my chairmanship will be of value to the Government in dealing with the many aspects of the problem of marine oil pollution.

Sincerely yours

Hans A. Kornberg

cc LPO
DOE

rh

Env Affairs

10 DOWNING STREET

THE PRIME MINISTER

28 November 1980

Dear Professor Kornberg

Thank you for your letter of 11 November about the proposal to transfer financial responsibility for the Royal Commission to the Department of the Environment.

I recognise your concern at the proposed change, as I realise how important it is that the Royal Commission should be recognised as impartial and independent. I do not believe however that the standing of the Commission should be affected by the change.

The change which is contemplated is one of Vote responsibility only. There is no intention of changing the status of your Commission. Royal Commissions enjoy, and will continue to enjoy, the independence from direct Ministerial control which is conferred by their Royal Warrants. The question of which Department accounts for spending does not therefore affect your independence nor need it in any way inhibit your freedom to comment on the activities of that Department.

The reason for the proposed change is the Government's policy of putting accountability with responsibility. It has always been something of an anomaly that the Civil Service Department should have Vote responsibility for Royal Commissions. The Department

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is not well placed to discharge the function effectively and, as you will recall, when non-departmental bodies were reviewed last year your Commission was looked at by the Department of the Environment as having general responsibility for the interests in this area.

But I do want to emphasise that there is no question whatever of proposals to change the terms of your Royal Warrant and the status and powers of the Commission will remain unchanged.

The Secretary of State for the Environment has been consulted about the proposed change and I am sure he would always be ready to see you at any time to make sure that the change of Vote responsibility has no adverse effect on your Commission and its work.

I am sending a copy of this to the Lord President of the Council and to the Secretary of State for the Environment.

Yours sincerely

MT

Professor Sir Hans Kornberg, FRS

From the Private Secretary

Civil Service Department
Whitehall London SW1A 2AZ
01-273 4400

26 November 1980

G.R.
Type/a PM, pl.
MAP

Mike Pattison Esq
10 Downing Street
LONDON SW1

Dear Mike,

Thank you for your letter of 12 November. Here is a draft reply for the Prime Minister to send to the Chairman of the Royal Commission on Environmental Pollution. It has been agreed with Environment; and I am copying this to Jeff Jacobs (Department of the Environment).

Yours sincerely,

Jim Buckley.

J BUCKLEY

DRAFT LETTER

Professor Sir Hans L Kornberg
Royal Commission on Environmental Pollution
Church House
Great Smith Street
LONDON SW1P 3BL

Thank you for your letter of 11 November about the proposal to transfer financial responsibility for the Royal Commission to the Department of the Environment.

I recognise your concern at the proposed change, as I realise how important it is that the Royal Commission should be recognised as impartial and independent. I do not believe however that the standing of the Commission should be affected by the change.

The change which is comtemplated is one of Vote responsibility only. There is no intention of changing the status of your Commission. Royal Commissions enjoy, and will continue to enjoy, the independence from direct Ministerial control which is conferred by their Royal Warrants. The question of which Department accounts for spending does not therefore affect your independence nor need it in any way inhibit your freedom to comment on the activities of that Department.

The reason for the proposed change is the Government's policy of putting accountability with responsibility. It has always been something of an anomaly that the Civil Service Department should have Vote responsibility for Royal Commissions. The Department is not well placed to discharge the function effectively and, as you will recall, when non-departmental bodies were reviewed last year your Commission was looked at by the Department of the Environment as having general responsibility for the interests in this area.

But I do want to emphasise that there is no question whatever of proposals to change the terms of your Royal Warrant and the status and powers of the Commission will remain unchanged.

The Secretary of State for the Environment has been consulted about the proposed change and I am sure he would always be ready to see you at any time to make sure that the change of Vote responsibility has no adverse effect on your Commission and its work.

I am sending a copy of this to the Lord President of the Council and to the Secretary of State for the Environment.

BF 25.11.80

Govt Affairs

10 DOWNING STREET

From the Private Secretary

12 November, 1980.

The Chairman of the Royal Commission on Environmental Pollution has written to the Prime Minister about the proposed change of financial responsibility for the Commission.

I should be grateful if you could let me have a draft reply for the Prime Minister to send. It would be helpful if this could reach me by 25 November.

I am sending a copy of this letter and its enclosure to Jeff Jacobs (Department of the Environment).

M. A. PATTISON

Jim Buckley, Esq.,
Civil Service Department.

RH

3030

12 November, 1980.

I write to thank you for your letter of 11 November.

I will place this before the Prime Minister, and a reply will be sent to you as soon as possible.

M. A. PATTISON

Professor Sir Hans Kornberg, F.R.S.

From: Professor Sir Hans Kornberg, F.R.S.
Chairman

Royal Commission on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212
Switchboard 01-212 3434

Your reference

Our reference

The Rt Hon Margaret Thatcher, M.P.
Prime Minister
10 Downing Street
London
SW1

11 November 1980

Dear Prime Minister,

I learnt only today of a proposal to transfer financial responsibility for Royal Commissions from the Civil Service Department to the Departments that have functional responsibility for their work; in the case of the Royal Commission on Environmental Pollution, the Department concerned would, I presume, be the Department of the Environment.

I feel strongly that this proposal may lead to a weakening of the Royal Commission's independence from any Departmental affiliations, which distinguishes it from other advisory bodies and which is its greatest strength. At present, the Commission is as free to comment on the activities of the Department of the Environment as it is on those of others, and has done so in several of its Reports.

I believe it to be most important that the Royal Commission should not only continue to be unlinked to the Department, but be clearly seen to be separate from it. I, therefore, very much hope that the Commission's functional independence will continue to be publicly asserted, whatever new financial arrangements may be envisaged for its financial control.

Kind regards

Sincerely yours

Hans L. Kornberg

JR

Home Affairs

2 MARSHAM STREET
LONDON SW1P 3EB

My ref: H/PSO/15181/79

Your ref:

17 September 1979

NBPM cc Press Office

Dear Tim

Mike Pattison wrote to David Edmonds on 10 September, enclosing a letter to the Prime Minister from the Chairman of the Royal Commission on Environmental Pollution telling her about the contents of their forthcoming Seventh Report on Agriculture and Pollution.

Copies of the Report have been sent to DOE and MAFF ahead of publication and both Departments are well apprised of its contents; Mr Heseltine and Mr Walker have both met Sir Hans Kornberg informally to discuss the report. Arrangements for publication on 18 September are being made by the Royal Commission who will hold a Press Conference that day and issue a Press Notice summarising the Report. Our Secretary of State will write to the Chairman thanking the Commission for their work and welcoming the Report, and this will form the basis of a Departmental Press Notice.

If previous practice is followed, a formal response from the Government will be required. DOE and MAFF are discussing how best to prepare a response taking account of the effects on the industry and the likely costs in manpower and money of implementing the recommendations.

I am copying this to John Chilcot (Home Office) and Garth Waters (Ministry of Agriculture, Fisheries and Food).

Yours sincerely

Paul Bristow

P N BRISTOW
Private Secretary

Tim Lankester Esq

Royal Commission
on Environmental Pollution
Church House
Great Smith Street
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Direct line 01-212 5600
Switchboard 01-212 3434

✓
NS

Your reference

Our reference RC/90/22

17 September 1979

At back of file.

Dear Pattison,

I enclose, in advance of publication at 11.30 tomorrow, Tuesday, 18 September, a copy of the "Confidential - Final Revise" of the Commission's Seventh Report, as laid before Parliament today and issued under "embargo" to lobby correspondents.

Copies of the "Confidential - Final Revise" are also being sent today to those on the attached list.

Yours sincerely

L. Rutterford

L F Rutterford
Secretary

M Pattison Esq
Private Secretary to the Prime Minister,
10 Downing Street,
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The Rt Hon Lord Soames, MP
Lord President of the Council,
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Sir James Hamilton,
Permanent Secretary,
Department of Education and Science,
Elizabeth House,
York Road,
London SE1 7PH

B/F 12.9.79.

Home Affairs

10 DOWNING STREET

From the Private Secretary

10 September 1979

Dear David

I enclose a copy of a letter addressed to the Prime Minister from the Chairman of the Royal Commission on Environmental Pollution. Professor Kornberg forewarns her of the publication of the Seventh Report of the Royal Commission.

I would be grateful if you would let me know if you are already aware of the substance of the report, and whether a formal response from the Government will be required. It would be helpful if you could let Tim Lankester have a response to these points as early as possible this week.

I am sending a copy of this letter and the enclosure to John Chilcot (Home Office).

Yours ever

Mike Pattison

D.A. Edmonds, Esq.,
Department of the Environment.

RA 13

10 DOWNING STREET

From the Private Secretary

7 September 1979

In the absence of the Prime Minister in Scotland, I am writing to acknowledge your letter to her of 4 September about the publication of the Seventh Report of the Royal Commission on Environmental Pollution.

I will bring this to her attention as soon as she returns, and I know that she will be grateful for this advance notice.

MAP

Professor Sir Hans Kornberg, F.R.S.

From the Chairman, Professor Sir Hans Kornberg, FRS

Royal Commission on Environmental Pollution
Church House
Great Smith Street
London SW1P 3BL

Direct line 01-212 8710
Switchboard 01-212 3434

Your reference

Our reference

4 September 1979

RS PS

The Rt Hon. Margaret Thatcher, M.P.
10 Downing Street
London SW1

Dear Prime Minister,

I am writing to let you know that the Seventh Report of the Royal Commission is to be published on 18 September. The Home Secretary is making arrangements to present the Report to Her Majesty and to lay it before Parliament.

The Report is the outcome of a study that the Commission decided to undertake in accordance with its broad remit to advise on matters of environmental pollution. The Commission considered that it would be timely and useful to investigate the pollution problems associated with agricultural practices, having in mind the intensification that has taken place in these practices over the period since the Second World War and the fact that this trend seems likely to continue.

The main areas covered by our Report are as follows:

(1) The greatly increased use of pesticides. We make a number of recommendations designed to bring about more careful and efficient use of these chemicals and thus minimise the environmental risks they pose while preserving the benefits of their use for agriculture.

(2) The greatly increased use of nitrogen fertilizers and the contribution from this source to nitrate in water supplies. We consider the health risks posed by nitrate and conclude that anxieties that have been expressed about these risks are not justified on present evidence and that current standards for nitrate levels in water supplies should be maintained

(3) Intensive livestock husbandry. We consider the environmental problems (chiefly those of smell nuisance and water pollution) that may be caused by the disposal of animal excreta from intensive livestock units. We regard these units as industrial rather than agricultural in character: we recommend additional controls on their development and operation and a greater emphasis on the development and use of waste treatment facilities.

(4) We also consider the effects on agriculture of pollution from industrial and urban sources: in particular, the risks posed by the disposal of sewage sludge on land and the effect on crops of common air pollutants.

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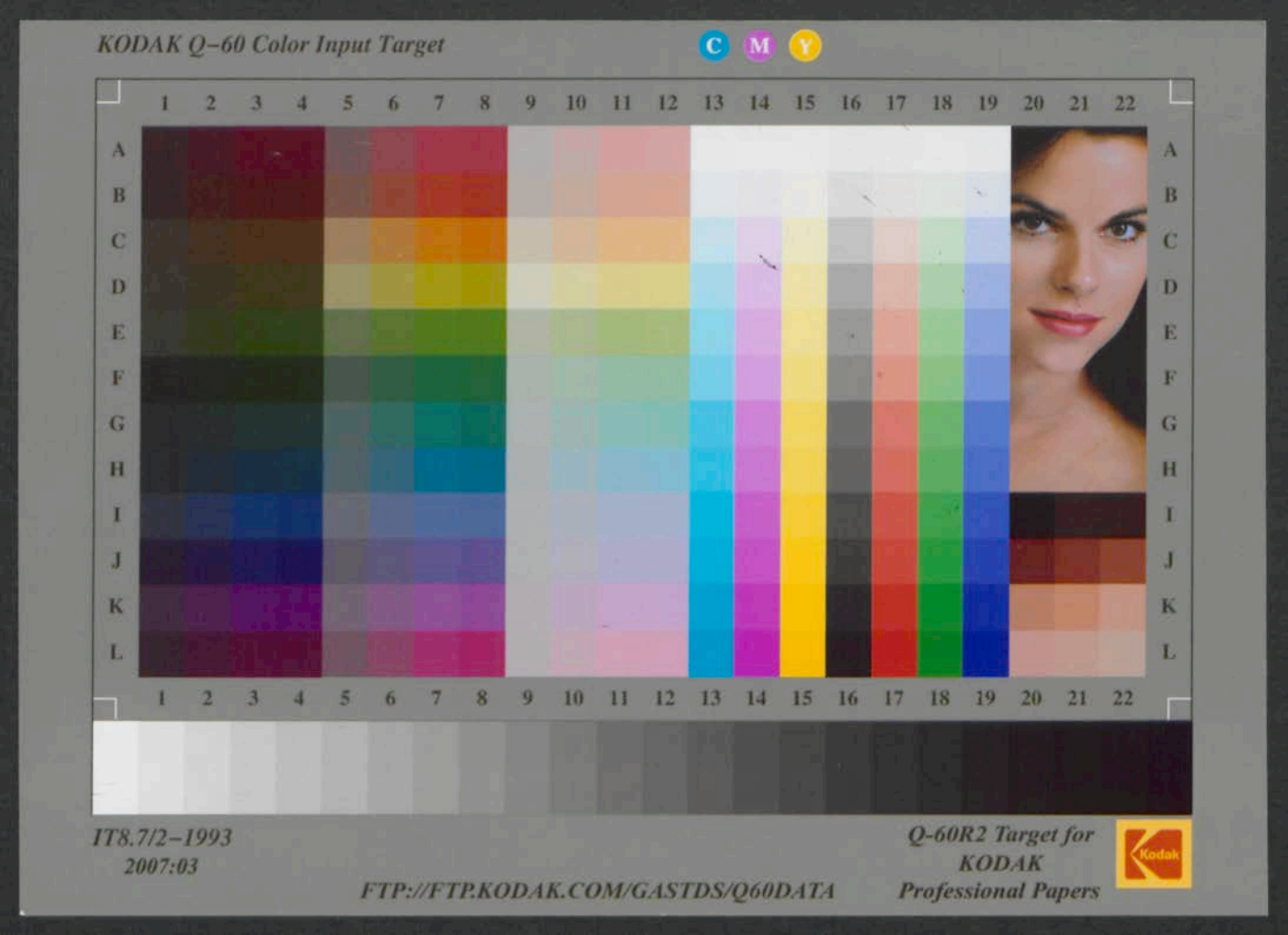
In broad terms, our main conclusion is that greater attention needs to be paid to pollution considerations in policies for agricultural development. We believe that the various measures we propose will help to advance the cause of both agriculture and the environment.

Sincerely yours,

Martin Kornberg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