

Confidential Filing

Policy on Waste Disposal + Sewage

ENVIRONMENTAL  
AFFAIRS

June 1989

Referred to	Date	Referred to	Date	Referred to	Date	Referred to	Date
<del>30.6.89</del>							
<del>14/8/89</del>							
<del>9.2.90</del>							
3.4.91							
Series closed							
PREM 19/3600							

STATEMENT BY THE DEPARTMENT OF THE ENVIRONMENT

Imports of hazardous waste are covered by the Transfrontier Shipment of Hazardous Waste Regulations 1988 to ensure that imports of hazardous waste are directed to appropriate facilities so that they can be disposed of safely. From 1987-89 US forces imported hazardous waste as defined in the Regulations from US bases abroad into the United Kingdom for disposal. Shipments of hazardous waste to the UK were suspended in November 1989 pending the outcome of the discussions between the Government and US forces as to whether their disposal in the UK should continue.

Although hazardous waste may be being imported under the 1988 Regulations through private contractors, US forces will not in the future import hazardous waste directly into their UK bases. Non-hazardous waste is still being imported for disposal in accordance with UK waste management law. Discussions are continuing with the US forces with a view to stopping the importation of all waste. The UK has taken the lead in the OECD in calling for all developed countries to become self-sufficient in disposing of their own waste. /x

Prime Minister

This is the statement issued by AFE this evening. The story turned out to be not quite as straightforward as we had hoped but the MoD managed to get the Americans to agree to 'X'.

Steph

3/4

Stephen Wall Esq,  
As/Prime Minister  
10 Downing Street  
London SW1

Department of Environment  
2 Marsham Street  
London SW1  
Tel. 276-4400

3 April 1991

Dear Stephen

I attach a copy of the statement we have issued today on the import of hazardous waste from US bases abroad. The last two sentences strengthen it, though, as we discussed, the statement invites follow-up questions.

We are liaising with MOD in seeking to secure American agreement to further curbs on the import of waste to the UK.

I also attach a background note. My Secretary of State has marked the passage where he thinks we need to make better progress.

I shall be happy to discuss all this with you further if you would find that helpful.

Yours

Richard Shaw

As/ Michael Heseltine.

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## NOTE FOR NUMBER 10

The Government's policy is that developed countries should dispose of their own waste.

US forces imported hazardous waste from their bases abroad for disposal between 1987 and 1989. They suspended such shipments in November 1989 when the Department of the Environment through the Ministry of Defence raised the matter with them. Discussions with the Americans have been on-going since then. The Americans have continued to import non-hazardous waste for recycling and disposal.

Last Sunday (31 March) the "Independent on Sunday" ran a story that hazardous waste was being imported by US forces from their bases abroad. Since November 1989 this is untrue. Other media (the Cambridge Evening News and Anglia Television) are now running the story.

The Department of the Environment, the Ministry of Defence and the Defense Logistics Agency of the US Department of Defense (who manage the disposal of US military waste in Europe) have agreed the attached statement for issue by the Department of the Environment.

The US forces have undertaken not to import hazardous waste into the UK for disposal direct. The US have not at present undertaken to stop the import of hazardous waste indirectly through local contractors they employ in the countries within which the bases are situated. Neither have the Americans undertaken not to import non-hazardous waste. These matters will continue to be pursued with them.

PRIME MINISTER

File

## DISPOSAL OF WASTE AT SEA

You may like to take a look at the attached letter from Chris Patten over the weekend, together with the advice from Carolyn Sinclair. We have yet to receive Mr Rifkind's reply.

Mr Patten points out that the UK is now alone of European countries in dumping industrial waste and sewage in the sea; and the scientific evidence against it, although far from conclusive, is growing. He says this will be a high profile issue at the North Sea Conference next month; and the UK should take the initiative now and move toward banning these practices. This would be at a certain cost to industry; and to local authorities and water authorities. But Carolyn thinks there are strong arguments, both substantial and presentational, for agreeing with Chris Patten.

You may want to await the comments of other colleagues before replying.

CBS

ant

Caroline Slocock  
9 February 1990

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PRIME MINISTER

8 February 1990

DISPOSAL OF WASTE AT SEA

1 Chris Patten has written to Malcolm Rifkind proposing:

- (a) that we set a deadline for ending the dumping of industrial waste at sea (say end 1992);
- (b) that we set a deadline for ending the dumping of sewage sludge at sea (1998 at latest);
- (c) that we commit ourselves to ending the discharge of untreated sewage into the sea as soon as practicable.

BACKGROUND

2 The UK will come under pressure to take these steps at the North Sea Conference in The Hague next month. No other European country dumps waste and untreated sewage in the sea. There are draft EC Directives in the wings which would oblige us to end (b) and (c). The Irish, who used to follow our practices, have recently announced that they are no longer going to do so.

3 Chris Patten's note says that

"on purely scientific grounds the case has not been made out for banning dumping at sea and treating coastal discharges of sewage."

But the Royal Commission on Environmental Pollution has begun to modify its view that the discharge of untreated sewage at sea is acceptable. A recent conference on water quality organised by NERC also expressed doubts. It concluded that

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"the demands now being made on the self-purifying ability of the enclosed and relatively shallow North Sea are increasingly relentless....The associated environmental threat is difficult to quantify...A particular issue to resolve is the degree to which these additional nutrients cause or exacerbate eutrophication (ie dominance of certain algal species)"

4 In other words, dumping waste or untreated sewage may be contributing to problems. Other countries bordering the North Sea have thought it prudent to stop both activities. It will be hard for the UK to maintain its leading role in international environmental matters while standing out alone on this issue.

FINANCIAL CONSIDERATIONS

5 In England and Wales the costs involved in ending the dumping of sewage sludge/treating sewage for disposal at sea will fall on the private water companies. In Scotland and Northern Ireland they will fall on the local authorities and thus mean increased public expenditure (which can only be partly recouped through higher charges).

6 Throughout the UK the cost of not dumping industrial waste at sea will fall on companies. We are committed to ending this practice anyway; it is a question of setting a date.

7 If we do not dump sewage sludge at sea, we will need to burn it. The capital cost of incineration is estimated roughly at £180 million, plus £25 million running costs per annum. About two thirds of the expenditure will arise in England and Wales, and the rest in Scotland. Expenditure might be over 5-8 years, depending on the date set for ending the practice.

8 Treating sewage before releasing it into the sea will cost a lot more - around £1 billion in capital, and £25 million per



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annum in running costs. Four fifths of these costs would fall on water companies in England and Wales, the rest on local authorities in Scotland. The investment would be spread over a number of years - probably more than ten, given that the water industry is already heavily involved in a £24 billion investment programme over the next 10 years.

9 Chris Patten's proposals will lead to increased water charges in England and Wales over a period of years. It is suggested that these might average between 4% and 8% over 10 years. The effect on the RPI would be minimal, but within the average there could be some sharp increases locally. While this will not be popular, water companies will be able to point to the ending of untreated sewage in the sea - itself very unpopular.

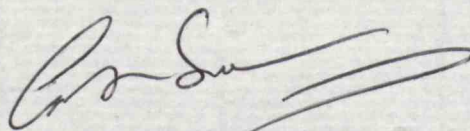
CONCLUSION

10 There are strong arguments, both substantial and presentational, for agreeing with Chris Patten that the UK should end the dumping of waste and untreated sewage at sea.

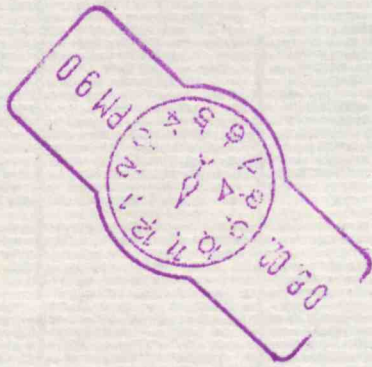
11 The costs are unwelcome, but will only get bigger if delayed. Water customers should be willing to pay for cleaner seas and beaches. Malcolm Rifkind may well argue that the Scots will be asked to pay proportionally more than their population would imply, but Scottish water charges are on the whole rather low.

RECOMMENDATION

Agree with Chris Patten's proposals to end the dumping of industrial waste, sewage sludge and untreated sewage at sea.



CAROLYN SINCLAIR





Bill

2 MARSHAM STREET  
LONDON SW1P 3EB  
01-276 3000

My ref:

Your ref:

Ben Slocock Esq  
Private Secretary to  
The Rt Hon Nicholas Ridley MP  
Department of Trade and Industry  
Victoria Street  
LONDON  
SW1

14 August 1989

Dear Ben

You will be aware of the current public attention to the import of hazardous wastes into this country for treatment and incineration.

My Secretary of State wishes to issue a statement this afternoon on PCB imports and because of television and media interest we would like to issue this statement as soon as possible. I should be grateful if you and copy recipients would let me know by 3.30pm today that you are content. 45

I am copying this letter and the statement to Caroline Slocock, Katherine Orrel (Department of Transport), Keith Davies (Welsh Office), Stephen Wall (FCO) Liz Smith (Department of Employment) and Myles Wickstead (ODA).

Yours  
Kate

KATE BUSH  
Private Secretary

The United Kingdom has not been, is not and will not be the dustbin for the world's waste.

That is not the issue in the current controversy surrounding the destruction of PCB wastes in Britain.

The risks from PCB wastes should be properly understood. They are not instantly poisonous or highly flammable. The risks lie in their persistence and accumulation in the environment and also in the possibility of dioxin emissions if PCBs are incinerated under less rigorous standards than those used by our own waste management industries.

I want to deal with four issues. First, trans-shipment; second, disposal; third, action to reduce dioxin levels in the environment; and fourth, the medium term objectives for the handling of waste of all sorts by developed and developing countries.

First, there must continue to be strict controls over the movement of all wastes. The special chemical wastes which have been shipped to Britain from Canada and some other countries have been subject to all these safeguards. Our procedures for disposal licensing and pre-notification of the movement of special waste were fore-runners in European legislation and in 1988 we were one of the earliest nations to implement transfrontier notification procedures for hazardous wastes under a new EC Directive.

Second, the overwhelming majority of the wastes that we destroy in Britain were produced here. Only about 5 per cent comes from outside. Other countries - particularly France - import for safe destruction more special wastes than we do. We have a first-class technology for dealing with wastes. What would be really disastrous for the world was if these wastes were to be dealt with less safely in other developed countries or simply dumped in the Third World.

Before chemical waste incinerators start up the Inspectorate of Pollution sets limits for emissions from them and approves the technical methods which they use. The Inspectorate carry out regular inspections and take samples. In addition they have recently undertaken a survey of dioxin levels in soils in England and Wales with particular attention being paid to levels around chemical and municipal incinerators. These results will be published. Control systems are kept under continuous review and are modified in the light of new knowledge or improved process technology. A new guide on best practice for chemical incinerators will be issued shortly. In these circumstances and with these safeguards on trans-shipment and disposal there is no environmental case whatsoever for refusing to handle these cargoes of special waste at British Ports - ports which have been handling this waste perfectly safely in the past.

Third, there is wholly understandable concern in this country and others about the hazards caused by dioxins. That is why we produced a report by leading experts in June setting out the results of the latest research on dioxins and proposing action to reduce dioxin levels from all sources in the environment. Rigorous controls on chemical incinerators are already in place. And we shall be putting in place similar controls on municipal waste incinerators.

Fourth, the disposal of waste throughout the world raises questions which can only be dealt with effectively internationally. Last year, we rejected proposals for the import of domestic waste from America. We have proposed to the European Community that transfrontier movements of waste directly for landfill should be banned. So far as chemical wastes are concerned, it is unlikely that poorer developing countries will be able for the foreseeable future to develop specialist treatment facilities. Developed countries - the members of the OECD - are in a different position altogether. I believe that OECD countries should aim to deal with their own wastes. Our industry is already helping them to develop the technology to do so. At the Environment Council which I shall be attending on 19 September I shall be pressing my EC colleagues to support me in taking this

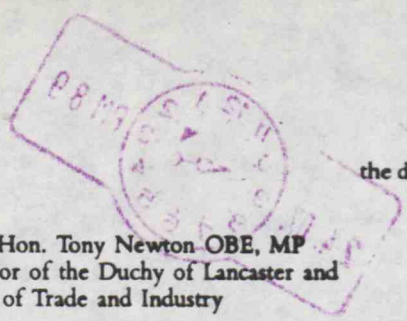
initiative forward in the OECD. But it would be ill-judged and irresponsible to call for an immediate ban on the movement of special wastes. All that would then happen is that there would be illegal dumping on land and at sea. That would be the worst of all crimes against the environment.

Let me say this, finally. The proposed arrival this August of consignments of PCBs is not a repeat of the Karin B story which rightly caused concern last year. It does no service to real concern about the quality of our environment to suggest otherwise. No-one seriously committed to improving our environment should seek to manipulate and play on public fears and worries by distorting risks and disregarding the value and effectiveness of our monitoring and controlling procedures and discrediting the standards of British technology in waste disposal.

Effective concern for the environment requires deep commitment, cool judgement and the sound application of scientific principles. If we proceed by panic and scaremongering we will only serve to discredit the cause of environmental improvement.

010

*cel/m*



# dti

the department for Enterprise

The Rt. Hon. Tony Newton OBE, MP  
Chancellor of the Duchy of Lancaster and  
Minister of Trade and Industry

Rt Hon Nicholas Ridley MP  
Secretary of State  
Department of the Environment  
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*NBPM*

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215 5147

24 July 1989

*Dear Secretary of State*

ENVIRONMENT PROTECTION BILL: WASTE DISPOSAL *Will request if required*

Thank you for sending me a copy of your letter of 18 July to John Wakeham.

I am content with most of what you propose but, as foreshadowed in my letter to you of 18 April about the response to the Environment Committee Report on Toxic Waste, I am not convinced about your preference for keeping regulation of waste with local authorities. On balance I would favour a regional system for control on the basis of the argument for that approach in the 24 January consultation paper and my view that a regional system would encourage a more strategic and long term approach to mirror the approach we want business to take, and are looking to encourage through the waste management element of the DTI Environmental Programme.

More generally, I think the change in waste disposal law you propose provides an opportunity we should not miss to clarify the role and responsibilities of local authorities in relation to recycling. This need not necessarily require any legislative change but we should at least aim to use statements during the passage of the bill to encourage local authorities to play a positive role in our general efforts to increase recycling.

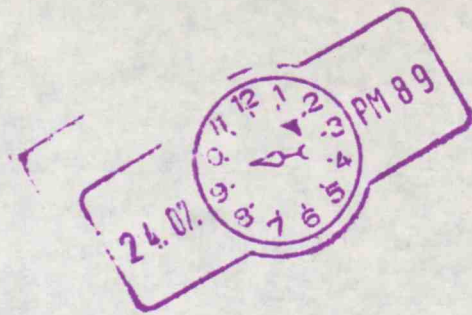
I am copying this letter to recipients of yours.

*Yours sincerely  
Rosalind GTF*

RC7ABG [Approved by the Chancellor and signed in his absence]

TONY NEWTON







# dti

the department for Enterprise

The Rt. Hon. Tony Newton OBE, MP  
Chancellor of the Duchy of Lancaster and  
Minister of Trade and Industry

Ms Kate Bush  
Private Secretary to  
the Secretary of State  
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24 July 1989

*NBN*

*Recg  
up*

*Dear Kate*

**HOUSE OF LORDS SCIENCE AND TECHNOLOGY COMMITTEE FOURTH REPORT ON  
HAZARDOUS WASTE DISPOSAL**

*Will be sent if required*

Thank you for sending me a copy of your letter of 21 July to Steve Catling and the proposed response to the above report.

Mr Newton is content for the response to be published.

However, this should not be taken as indicating any change in DTI's preference for a regional system of waste control about which Mr Newton has written to Mr Ridley. What is said on this point obviously needs to be consistent with the terms of the policy statement which is to be made simulataneously with publication of the response.

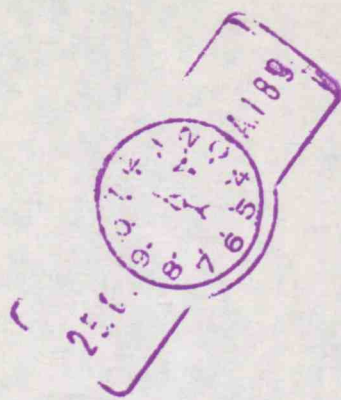
I am copying this letter to recipients of yours.

*Yours  
Rosalind Cole*

ROSALIND COLE  
PRIVATE SECRETARY

RC7ABQ





R30/6



Minister for Water and Planning

Department of the Environment  
2 Marsham Street  
London SW1P 3EB

Telephone 01 276 3310

AS

30 June 1989

*Dominic Morris*

You asked Roger Bright for some background information on long sea outfalls policy for the Prime Minister's weekend box, and this is attached.

You also asked for a more sympathetic reply to Tony Speller, with an expanded background note. This ~~will~~ *is attached* follow ~~shortly~~, though I have not had an opportunity to clear it with Ministers here.

*Yours sincerely  
A. Ridwell*

ALAN RIDDELL  
Private Secretary

Dominic Morris Esq



## LONG SEA OUTFALLS - TREATMENT OF BACTERIA.

### 1) Outfalls are Effective

We have good evidence to show that long sea outfalls, if they are well-designed, and all local discharges are accounted for, can be an effective way of enabling bathing waters in the vicinity to meet the EEC Bathing Water Directive's bacteriological standards.

They can also effectively remove visibly offensive sewage material.

### 2) Steps have been taken by the Department to Ensure that Long Sea Outfalls are Properly sited and well-designed.

The Department has taken steps to ensure that long sea outfalls are properly sited and well designed.

Her Majesty's Inspectorate of Pollution have issued guidelines by which on the design of long sea outfalls may be assessed, and HMIP inspectors will not issue consents for discharges from new long sea outfalls unless they are satisfied that the outfall is suitably designed and that any adjacent bathing waters will meet the Directive's mandatory coliform standards.

HMIP inspectors have discussions with water authorities during the design stages of new long sea outfalls in their area.

### 3) Long Sea Outfalls have been Proved by Experience

The main defense of Long sea outfalls is that they have been proved to be effective by experience.

A number of long sea outfalls have been built to improve bathing waters previously served by unsatisfactory short outfalls. With the new long sea outfall in operation, the waters now consistently meet the mandatory bacteriological standards. Examples of such outfalls are at Margate, Tenby, Bridlington and Weymouth.

### 4) Scientific Principles used in Ensuring that Bacteriological Standards are Met.

Long sea outfalls are based on simple scientific principles.

**Firstly**, they discharge screened sewage into deep water, where bacteria immediately undergo a rapid dilution. **Secondly**, the bacteria are diluted further by mixing and diffusion and the action of waves and tides. **Thirdly**, the bacteria are broken down in daylight hours by the action of sunlight and salinity.

The time taken for 90% of coliform bacteria to be destroyed in the sea ranges from 1 to 30 hours depending mainly on the turbidity of the water. For example, bacteria will die off more slowly in the murky waters of the Bristol channel, than in the clear sunny waters of the Mediterranean.

## 5) Table to Demonstrate Dilution and Die Off

The way in which the dilution and die off principles work in practice can be seen in the following table. This gives the numbers of faecal coliform bacteria at various stages through a long sea outfall and into the receiving water.

The EEC Mandatory Standard for Faecal Coliforms is 2000 per 100 ml

Raw sewage entering outfall	10 million faecal coliforms per 100 ml
Immediately above the point of discharge	100 thousand faecal coliforms per 100 ml
Mixing and diffusion	4 thousand faecal coliforms per 100 ml
Mortality due to sea and sun ]	4 hundred faecal coliforms per 100 ml.

## 6) Variables which must be considered for Good Outfall Design

This all looks very simple and straightforward. However, in order to properly site an outfall which will ensure that the bathing waters in the vicinity meet the Directive's standards, a large number of variables must be closely and correctly defined. If they are not fully considered, the outfall may not achieve its aims. Some of the more important variables are:

- a) Gradient and contours of the sea bed.
- b) The mean rise and fall of tides and the strength, direction and duration of tidal flows
- c) The direction, force and prevalence of winds.
- d) The population served, and its variability
- e) Whether there are fisheries in the area
- f) The quantity and nature of sewage to be discharged.
- g) The presence and frequency of operation of storm overflows
- h) Bacterial loadings of any adjacent rivers.
- i) Initial dilution achieved by the outfall and rate of bacterial die off under various conditions.

ECON 73/88/89

REVISED DRAFT ANSWER

Long sea outfalls are a safe and effective means for the disposal of screened sewage. Her Majesty's Inspectorate of Pollution grant discharge consents for such schemes only where these are well-designed and enable bathing waters in the vicinity to meet the requirements of the EC Directive standards. I do not therefore propose to instruct my Right Hon Friend the Secretary of State for the Environment to exercise his powers to prevent further schemes involving long sea outfalls. Indeed it would be quite improper to advise him in this way on the exercise of his statutory functions.

SUPPLEMENTARY BACKGROUND NOTE

1. The MP has asked a number of PQs recently about pollution issues in the Bristol Channel.

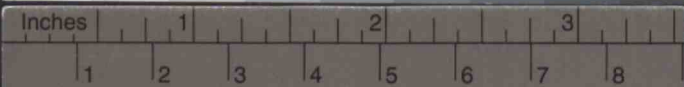
2. In general, he considers that the disposal of "raw" sewage at sea is unsatisfactory on environmental grounds. In particular, he believes that the configuration of the Bristol Channel is such that it is a marine cul-de-sac in which the action of waves, sea and sunlight are ineffective in breaking down the organic matter in sewage. In reply to the MP we have pointed out that HMIP only approve schemes where these meet the published guidelines on long-sea outfalls and enable local beaches to comply with the EC Directive standards.

3. He has also asked about the target date for bringing <sup>beaches</sup> up to EC standards, and has suggested this might be achieved by 1 January 1990. We have said that water authorities have been asked to draw-up programmes which aim for compliance by the mid-1990s, and that these are under discussion with the Department.

# Grey Scale #13



**A** 1 2 3 4 5 6 **M** 8 9 10 11 12 13 14 15 **B** 17 18 19



## Colour Chart #13

Blue      Cyan      Green      Yellow

