



DEPARTMENT OF TRANSPORT
2 MARSHAM STREET LONDON SW1P 3EB

My ref:

Your ref:

The Rt Hon Nicholas Ridley MP
Secretary of State for the Environment
Department of the Environment
2 Marsham Street
LONDON
SW1P 3EB

N&PM

26 JUL 1988

Dear Nicky

INTEGRATED POLLUTION CONTROL

I have ^{*with DM?*} seen your draft consultation paper under cover of your note to the Prime Minister of 15 July.

I am generally content with your proposals. However, I remain concerned over the use of differing definitions. Your proposals refer to 'special wastes' as defined in the Control of Pollution (Special Wastes) Regulations 1980, but these are different from existing transport definitions which have stood the test of time and are familiar to the transport industry. So, if a transport movement is involved in the disposal process, the contention that bureaucratic demands on firms will be reduced may be in doubt. It is still not clear from the current draft whether or not the complete disposal operation would always take place within the confines of a site. Our officials are continuing to discuss the problem of definitions in a wider context than these proposals and I believe an answer can be found.

I am concerned about possible implications from your proposals for charging to cover, inter alia, HMIP's enforcement activities. There may be a parallel here with my Department's use of the Health and Safety Executive's Factory Inspectorate as the enforcement authority for our road regulations for the transport of dangerous goods but we do not make charges in that area.

I am copying this letter to members of E(A), the Lord President and to Sir Robin Butler.

Yours,

Paul

PAUL CHANNON