

Working Groups



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Business & Innovation

EIC's Business & Innovation Working Group highlights the innovation needs of the environmental technology sector and works with Government and other stakeholders to encourage policies that stimulate the commercialisation of technology and encourage business growth.

Over the last year, the Group has continued its campaign to identify and address the barriers concerned with the implementation of environmental regulation. Whilst environmental regulation plays a key role in stimulating innovation by creating a demand to develop solutions to the key environmental challenges we face, the effectiveness of specific policy measures in encouraging new approaches depends crucially on their design and implementation.

As a result of EIC lobbying, the Environment Agency has appointed a single point of contact through which EIC members can raise issues where regulatory barriers are seen as a barrier. EIC has also proposed that the Agency provides information on its website in the form of Frequently Asked Questions. The Group has also looked at the financing and support provided for new eco-technologies. EIC recently set up a joint initiative with Angel Bourse to provide UK environmental companies with access to global investors. EIC has also provided workshops for members on this subject.

EIC is represented on a number of Government committees established to support environmental innovations. This includes Defra's Commission on Environmental Performance and Economic Performance that is examining how the UK can make the most of the key opportunities that environmental protection can present for wealth creation and employment growth.

Throughout the year, we have also maintained an active watching brief on the provision of R&D information for environmental innovators. Some time ago EIC presented a proposal to the DTI on the provision of a dedicated web portal for environmental R&D funding. DTI now provide this information via Business Link website and we have worked with DTI and Business Link to try to encourage a better representation of environmental R&D information through this source.

EIC is also monitoring important developments at the European level, particularly the EU's Environmental Technology Action Plan and the proposed Environmental Technologies Verification (ETV) System. The overall objective of an ETV System is to provide credible information on the performance of environmental technologies, in order to facilitate their market uptake or wider use. It will provide information on the environmental and economical benefits of environmental technologies.

Carbon Trading

These are exciting times for the EIC's Carbon Trading Working Group (CTWG). In the last six months much has happened in the UK and Europe to drive forwards progress on climate change. The UK has seen the publication of the Stern Report synthesising the economic case for action on climate change into a single thorough and persuasive format, closely followed by the publication of the UK draft Climate Change Bill with an ambitious 60 per cent emissions reduction target out to 2050. At the European level, the European Council (EC) has set in motion the first multi-lateral post-2012 agreement on climate change with hard targets of a minimum 20 per cent, or maximum 30 per cent if other nations take on targets as well. The EC is also currently ruling on Phase II of the EU ETS and is considering radical design changes for Phase III. The EIC CTWG is inputting into all of these ongoing processes.

In the UK the CTWG has provided input to a Defra consultation that is seeking to set a standard for voluntary carbon offsets. The consultation was extremely timely for the fledgling industry, building up around companies wishing to voluntarily reduce their carbon footprint. The CTWG's membership contains a number of companies who are involved in the provision of emissions reductions, emissions reduction technology to the voluntary and compliance markets and as such were able to provide valuable input from a range of perspectives.

Of equal importance was the consultation on the energy performance commitments (EPC). This is a plan by Defra to pull in medium-sized consumers of electricity such as supermarkets and large offices into a cap-and-trade scheme. The CTWG provided input into the ongoing consultation, hosted a talk from Defra, and advocated in favour of the EPC to the Treasury. The 20-30 per cent reduction targets agreed by the EC, are a clear signal that Europe's future is going to be increasingly carbon constrained with all of the challenges and opportunities that this will bring. Within this context, the CTWG has been providing input into European Climate Change Programme's (ECCP) ongoing consultation on Phase III of the EU ETS.

For Phase III review, there have been some fairly radical suggestions on the shape it should take. Current proposals include moves towards greater harmonisation of rules on allocation that should help to level the playing field between member states. Even more promising is the proposal that the allocations at an installation level should be set centrally by the Commission rather than at a national level. Implementation of these rules with a clear and early indication to industry as to how they will be allocated will allow companies to plan their abatement strategy into the future with confidence.

Working Groups



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Climate Change

Climate change is widely accepted as one of the greatest threats we face, and as we have seen over the last year, the political establishment has finally started to take this threat seriously. There is a broad consensus that energy efficiency is a key tool and the Government has rightly identified demand reduction as the most effective approach to tackling climate change. Despite the introduction of a wide range of measures to encourage energy efficiency it is clear, however, that a step change is urgently needed to reduce energy demand in homes and all commercial and public buildings.

EIC's Climate Change Working Group, which represents over 80 companies involved in providing advice and technology in the field of energy efficiency, has been engaged in high-level lobbying in recent years on how to achieve this much needed step change. Recently the Group launched a Joint Statement on Energy Efficiency bringing together some of the country's leading energy experts and business leaders to set out 11 clear and achievable steps that will help achieve the Government's 'ultimate ambition' of using every unit of energy as efficiently as possible. The Group has met with Ian Pearson MP, Minister of State for Climate Change, to discuss the increasing gap between policy and reality in respect of procurement of large public sector building projects - encouraging the Government to 'lead by example' by ensuring that the inclusion of climate beneficial technologies and services are considered fully, on a lifecycle cost basis instead of just a capital cost basis, for inclusion in the large number of public-funded buildings erected every year.

Linked to this, the Group will continue lobbying to increase the capital incentive for the most efficient and innovative technologies to 150 per cent - this would provide sufficient incentive to ensure building owners specify qualifying technologies on the energy technology list. The Group will also lobby to speed up the process for including new technology categories on the Energy Technology List, which is currently an average of three years and a clear barrier to innovation.

The Group will also be lobbying over the next year on improving energy efficiency in existing buildings and extending the requirement to display an energy performance certificate - currently required in buildings greater than 1,000sq m occupied by public authorities and by institutions providing public services - to all commercial buildings. For domestic buildings the Group will lobby for greater incentives for achieving absolute emission reductions in existing homes as well as ensuring that the Government fulfils its commitment for all new homes to be zero carbon within 10 years. Energy efficiency is a key tool in the battle against climate change and using every unit of energy as efficiently as possible has to be our ultimate ambition.

Contaminated Land

The EIC Contaminated Land Working Group has had another extremely busy year. Although some agenda items may seem very familiar to the 180 member companies in the group, real progress has been made in a number of areas.

Soil Gas Standard

One real success emanating from the Group has been the preparation of a new British Standard for the characterisation and remediation of ground gas in Brownfield developments. This was lobbied for by the Group and led to the persuasion of the British Standard Institute to introduce a new Standard. Group members drafted the text and it is now out for consultation prior to the forthcoming publication.

Part 2A / CLEA

Following the highly successful Remediation Licensing Task Force, there was a high degree of hope that the very well supported Soil Guideline Task Force would also find a solution to the very slow introduction of the Soil Guideline Values and an improved version of the CLEA risk assessment programme. However, since the publication of the Defra Way Forward Paper (CLAN6/06) on Soil Guideline Values, progress has been extremely slow.

Mobile Treatment Licensing

The introduction of Mobile Treatment Licensing system in 2005 gave the remediation industry a well-needed boost with an enormous simplification of the remediation licensing system. However a number of contractors are now reporting considerable delays in gaining approval from the Environment Agency for Deployment Forms, which are required prior to mobilisation to site. The Group is lobbying for a centralised Deployment Form assessment team at the Environment Agency, and it is hoped that the current slow rate of progress can be accelerated.

Environmental Permitting Review

A number of Group members have been following developments in the Environmental Permitting Review, which is a new concept in combining Pollution Prevention and Control legislation with the Waste Management Regulations, into a common permitting and compliance system, known as the Environmental Permitting Programme.

Review of Waste Exemptions

The brownfield redevelopment industry relies heavily on the use of a number of exemptions from the Waste Management Licensing Regulations for the re-use of inert or contaminated soil on sites. Defra has announced a review of the exemptions to Waste Licensing. The Group have asked Defra for an update on progress on this review and will aim to ensure the current system is improved for the benefit of the entire remediation industry.

Brownfield Tax Incentives

The Group is also extremely concerned at present moves by the Treasury to review the various tax incentives available for the development of Brownfield land. These range from the landfill tax exemption to the land remediation relief currently available to developers.

Working Groups



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Laboratories



William Averdieck

Group Chair
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Environmental Laboratories

The focus of the Group is to promote the national and international competitiveness of the member companies who provide sampling, laboratory, field-testing and associated services to clients in support of pollution control and prevention, remediation and sustainable development. Most of these activities are within a regulatory framework. These laboratories need to be aware of regulation in general so as to operate as an informed stakeholder and also have a forum in which to offer comment on new legislation.

The last year saw a rise in the number of organisations in the EIC and this was reflected in a growing Laboratories Group. The last 12 months has also seen the start of many new regulations or changes, including the Priority Substances Directive under the Water Framework Directive (WFD), the outputs from the Soil Guideline Values Taskforce and the MCERTS scheme for Direct Toxicity Assessment (DTA).

MCERTS for Soils

This accreditation scheme has been established for just over two years. The Group still seeks to promote its use as a means to provide more defensible data for the decision making process of land quality. The Environment Agency is to review its usage to ensure best practice within the Agency and Defra has endorsed its use within England and Wales. The Group are in contact with SEPA to promote the scheme in Scotland. From July this year, MCERTS (UKAS) accreditation will be available for hydrocarbon banding.

MCERTS for DTA

These became available this year. EIC laboratory members input into this standard and one of its roles is to support assessment of discharges under the IPPC Directive. Approved laboratories are listed on the Agency website.

Waste Acceptance Criteria

Although the scheme has operated for nearly two years, it is apparent that some companies in the waste chain are having difficulty with the requirements, whether it is classification, appropriate treatment or disposal. Group laboratories may be able to assist with evaluating the efficacy of pre-treatments or identify dissolved organic matter (DOC) that is causing a numeric exceedance of a limit, for example. Some of these issues are, or will be, addressed by the Agency through stakeholder fora.

From 30 October 2007, the Landfill Directive requires all non-hazardous waste to be treated before landfill. Unlike hazardous waste, there are no standards or limit values - what is required is that the waste be treated. This treatment is defined as physical, thermal chemical or biological. To comply at a basic level, will only require the waste to be sorted with a proportion of the sorted waste being recycled. More advanced processes are in operation, supported by laboratory testing, which allows biodegradable waste to be composted and remaining waste, after recyclates have been removed, to be incinerated, ideally as CHP.

Industrial Air Pollution Control

The UK has a strong record in industrial air pollution control, underpinned by effective, forward looking, pragmatic legislation and a strong supply industry, working in partnership with industrial operators.

The Air Pollution Control Working Group provides a reasoned and knowledgeable voice to policy makers and regulatory bodies on the adoption and implementation of legislation effecting industrial air pollution, the capabilities of the air pollution sector and the environmental benefits of best practice in the air pollution sector. Legislation of particular focus includes:

- Integrated Pollution Prevention and Control Directive (IPPC) including the BREF process and UK implementation via PPC and sector notes
- Waste Incineration Directive (WID)
- Large Combustion Plant Directive (LCPD)
- Local authority controlled industrial plant (Part B processes)

Current priorities for the Air Pollution Control Working Group are participation in the following reviews, consultations and initiatives:

- IPPC BREF revisions (Europe and UK)
- Pragmatic legislation enforcement (IPPC permits)
- Transparency of information (pollution emissions register)
- Process guidance revisions and Part B regulation
- Air quality strategy

The EIC's Air Pollution Control Working Group represents the views of members across the air pollution sector including, test houses, environmental consultancies, air pollution control equipment suppliers, universities and the suppliers of dust and gas monitoring instrumentation. Members include both the UK offices and distributors of overseas air pollution companies and UK based manufacturers.

Working Groups



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Simon Rickaby

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International Business

EIC's International Business Working Group represents companies carrying out international business across most sectors of the environmental technology and services industry including consultants, training providers, technology firms and equipment manufacturers. The environmental goods and services industry is worth US\$51.5bn per year, and the environmental technology and services industry is at its heart.

Two years ago the Group carried out a survey of all members on the help available from Government on export activities, which revealed that 90 per cent of respondents believe that the current level of Government export support is inadequate. It also found a huge lack of knowledge of Government environmental export promotion schemes demonstrating a communication challenge for the UK and EU Government support agencies. Since then the Group has worked to help close this communication gap by bringing it's members and the relevant government departments closer together.

The Group also works closely with the Environmental Sector Advisory Group (ESAG), which advises UK Trade and Investment on how business and government can best work hand in hand.

The Group held a popular seminar on exporting environmental goods and services to the Accession States. We believe that this is a major market sector for UK businesses going forward. During the year the Group's members also met with key policy makers in the export field including the Environmental Industries Sector Unit (EISU), the Overseas Project Funds, DTI and Defra.

The future success of the UK's environmental technology and services industry in growing the global marketplace, depends on the ability to work with government to promote this important industry sector.

Oil & Marine Pollution Control

The Oil & Marine Pollution Control Working Group is working towards ensuring the sustainable development of the UK and international marine environment through removing the barriers to UK companies that can provide oil spill pollution prevention and control technologies and services to both the onshore and offshore environment. Its Members consist of representatives from oil spill response companies, manufacturers of oil pollution control technologies, marine environmental protection services, environmental consultancies, pollution monitoring organisations, laboratories, academic institutions, marine infrastructure companies and associated industries.

The Group's objective is to identify key regulatory barriers to growth facing the industry. We are working to overcome them by lobbying for relevant legislation, standards, regulations and economic instruments, as well as effective and consistent enforcement. Over the last year the Group has been pushing for the establishment of a statutory MOT style inspection regime for oil tanks and has prepared a paper outlining the benefits of such a scheme as a better regulation measure for reducing pollution incidents involving oil and fuels. The Group has raised the proposal in a meeting with Ian Pearson MP, Minister of State for Climate Change and will be urging the Environment Agency to include the recommendation that the Government implements a mandatory MOT scheme as part of their review of the Control of Pollution (Oil Storage) (England) Regulations 2001.

Amongst other key issues for the Group is the forthcoming Marine Bill. Members have been engaged with Defra throughout the consultation process of the Marine Bill and will continue to do so after the formal consultation process, as the Bill progresses through Parliament.

Other matters currently being pursued by the Group are: requirements to use accredited clean-up companies for oil spills; UK implementation and attitude towards the European MARPOL Directive; the issue of planning for dealing with chemical spills; the definition of waste oil and the disposal of oily waste. A number of high calibre guest speakers, representing policy makers and regulators, such as the Environment Agency and Defra have delivered a series of presentations providing the opportunity for the Group to direct probing questions to the right people and assist in shaping Government policy and its implementation. The coming year will see the Group focusing on developing these and other initiatives with a view to driving high standards of oil pollution control both on and offshore and removing the barriers to our Members providing the products and services to enable these standards to be met.

Working Groups



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Renewable Transport Fuels

The EIC Renewable Transport Fuels (RTF) Group is now in its third year of operation and has seen its membership and activities grow significantly in the last 12 months. The Renewable Transport Fuels Obligation (RTFO) has once again been a major focus of the Group's work, with Government consultation on the scheme reaching its final detailed stage. Members of the Group have been involved in work on the detailed design of the scheme, and the long-term aspirations on targets and fuel qualities.

A key area of the scheme that is attracting growing public attention is the accreditation of carbon and sustainability performance for each source of biofuels. EIC has always shown a strong commitment to demonstrating best environmental practice in return for public and political support for biofuels. The Groups Members continue to play a leading role with the Low Carbon Fuels Partnership in championing reporting schemes that will initially record carbon and sustainability performance, and soon determine levels of support for each stream.

EIC once again hosted a major conference on the RTFO, with keynote speakers from Government, the EU and the oil industry, as well as our own representatives from the biofuel industry. In addition to the RTFO, Group Members have been represented on or have responded to the following reviews of biofuels:

- The Royal Society biofuels study.
- EU Biofuels Directive Review
- EU Fuel Quality Directive Review
- HMRC review of definitions of biodiesel
- Treasury review of Enhanced Capital Allowances for biofuel plant
- Review of support and tax treatment for high blend biofuels
- Ad hoc departmental and ministerial discussions on biofuels
- Association of Petroleum and Explosives Authorities review of handling arrangements for high blend ethanol fuels.

The Group has also initiated a regular dialogue with the Environment Agency. Commencing with a joint EIC and Environment Agency seminar on regulating biofuels, a series of issues from planning consents, to regulation of co-products, are now regularly reviewed by a joint working group. The Group's membership has expanded once more, with over 50 members. New members include companies establishing major new biofuel plants and leading consultants. With membership now encompassing a range of interests from biodiesel producers (from reclaimed oils and new crops) bioethanol producers, equipment suppliers and consultants, the Group finds itself asked to input to a wide range of ad hoc technical, and political debates. The current moves to reclassify the toxicity of ethanol and concerns over unfair subsidy of biodiesel are typical of the ongoing input that the Group makes to developing the biofuels market. The technical expertise and strategic outlook of our members are central to our continued growth, and to our credibility and influence with Government.

Scottish Contaminated Land

During the Remediation Licensing Task Force it became apparent that Scottish Legislation was likely to diverge significantly from that in England and Wales. EIC discussions with the Scottish Executive and SEPA revealed that Scotland was likely to adopt a licensing system for on-site remediation that could be entirely incompatible with the new Mobile Treatment Licence system South of the Border. It was decided there was a need for a specific Scottish Working Group that initially would focus on the brownfield redevelopment area, and would subsequently be expanded to cover other areas of interest to the EIC. The six monthly meetings are consolidated by our Autumn EIC Scotland Conference that has been a sell out for the first two years. This is being held again in September 2007. The Group meetings tend to focus on similar issues to the main Contaminated Land Working Group with key issues including the following:

Soil Guideline Values - as the introduction of revised Soil Guideline Values south of the border seems to be an interminable process, a sub group is looking into whether it may be possible to introduce a more pragmatic system north of the border, perhaps using a practical set of figures that may already be in use.

Definition of Waste - one area where there are significant differences in the viewpoint taken by SEPA compared to that south of the border, is in the re-use of soil following remediation. At present in Scotland a situation exists where guidance in the waste pages of the SEPA website runs contrary to advice given in the brownfield/contaminated land section. The Group is seeking to resolve this issue and to try and ensure that a pragmatic viewpoint is taken by SEPA in allowing remediated soils to leave the waste stream and be simply re-used onsite, following a risk assessment.

Clean Up Levels in Groundwater - another problematic issue for brownfield redeveloped in Scotland is that SEPA very often insist on drinking water standards being achieved in groundwater below a site, measured at the site boundary. This is a very onerous position to take and not helpful in Scotland where, particularly in our industrial areas, there is virtually no chance of groundwater ever being required as a drinking water resource. The Group are lobbying for a degree of significance being taken in to account. This should help to ensure that the delays associated with the negotiations required around this sticking point are reduced. At present this drinking water standards at the boundary viewpoint can make redevelopment opportunities untenable.

As per the Contaminated Land Working Group south of the border, the Scottish Working Group meetings are addressed by august individuals from SEPA and the Scottish Executive. It is our intention that the Scottish Group will continue to grow and the EIC will then be able to be put more resource in to lobbying the various Scottish and Environmental and Legislative organisations.

Working Groups



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Sustainable Development & Management

Sustainable development and its management continue to move up the agenda as the over-arching theme through which the various forms of regulation and best practice shown by EIC members link together. The Group's aim, through the focus on key work areas, is to lobby Government on regulation and voluntary 'codes', find synergies with other organisations and increase the knowledge of members to move towards a more sustainable and competitive economy.

The key work areas and associated activities during the year are:

Corporate and Environmental Reporting - with the demise of the Operating and Financial Review, the Group has focused on the consultation around the Business Review (evolving from the EU Modernisation Directive) with the aim of using the regulation as the basis for clear, structured, consistent and improved reporting by corporate organisation on environmental and social material issues. Aligned with this, the Group has been working with other organisations to set out appropriate methods for assurance of such information in corporate reports to enable stakeholders to have confidence in the content and data.

Environmental Management - where the Group lobbies on effective implementation of certified management systems, that bring about not only compliance but performance improvement. A useful and informative presentation was provided by UKAS with a view to understanding and supporting the aims of UKAS and its activities that ensure consistent and high quality certification of environmental, sustainable development and integrated management systems.

Greening Public Procurement/Sustainable Construction - which has been a very active area of the Group with the involvement in the consultation on the Code for Sustainable Homes, input into the Sustainable Procurement Task Force and the DTI Sustainable Construction Strategy.

Sustainability Appraisal and Planning - the Group recognised that delivery of sustainable communities and buildings starts with the planning and appraisal process. The Group provided a response on the consultation of the Environmental Impact Regulations and will lobby on ensuring that appraisal and planning process integrates all the necessary requirements on climate change, waste, affordable housing, sustainable construction. Therefore this area has emerged as one of greater importance and will be a focus in 2007.

Environmental Data - the Group recognised that underpinning evidence based decisions in planning, appraisal, impact assessment, demonstration of sustainable construction, management and corporate reporting requires robust data techniques and transparency. The Group will unpick this work area to find an effective way to raise such issues up the agenda and an effective mechanism to enact change.

I would like to take the opportunity to thank all the members of the Group that have actively participated and also to those new members that have joined the Group this year. I look forward to an active work programme for the coming year

Transport Pollution Control

The EIC's Transport Working Group represents organisations actively involved in creating and marketing solutions that help reduce the environmental impact of transport. Since its inception in 1996, the Group has maintained an ongoing and active dialogue with Government on key issues related to transport and environmental policy. Through this dialogue, it has established a track record of successful campaigning for policy support to encourage the uptake of cleaner fuels and technologies that reduce vehicle emissions.

Tackling transport emissions remains as relevant today as in previous years. The Government continually stresses the importance of tackling climate change, and local authorities across the country are acutely aware of urban air quality problems. At both levels, the environmental industries sector offers solutions that help cut vehicle emissions but require policy support, whether by regulatory measures or through the use of financial instruments.

During 2006, through the PRECIS Working Party, the Group actively supported the Greater London Authority and London Councils in the development of the London Best Practice Guidance for the control of emissions from construction work. Members of the group are now involved in the implementation of this Guidance. The Group has also been involved with Transport for London and their advisors in developing their plans for the proposed London Low Emission Zone (LEZ).

In addition to these campaigns, the Group has been in dialogue with Defra and the Department for Transport (DfT) on the National Air Quality Strategy. Support at this policy level for Low Emission Zones and the application of retrofit technologies on urban vehicles is essential. The Group has maintained its involvement in key Government and industry forums, including the Low Carbon Vehicle Partnership, the Air Quality Forum and the Cleaner Transport Forum. It has also contributed to the EU-sponsored Sadler Report on supporting technical measures to reduce emissions from existing heavy-duty vehicles.

The next year will see the Group pursuing its campaigns in these areas, and no doubt responding to the fresh challenges will inevitably arise in this exciting sector.

Working Groups



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Waste Resources Management

EIC's Waste Resources Management Working Group represents Members' interests across the whole waste and resource sequence, from generation, minimisation and recycling, to treatment for re-use or disposal. Achievement of the far-reaching changes in the Government's Waste Implementation Programme (WIP) requires the integration of all available waste management techniques.

The Group has submitted reports and representations to Defra, HM Treasury, DTI, and the Hazardous Waste Forum, and representatives have in the last year met John Healey MP, Ben Bradshaw MP, Sir John Harman, and Neil Thornton, Defra's Director of Sustainable Production Consumption and Waste. Following submission of detailed comments on the Waste Strategy Review 2006, the Group will be actively reviewing the enhanced recommendations of the 2007 Waste Strategy when published in the summer.

The recommendations of the Group for a significant increase in Landfill Tax have been taken up in the budget announcement on an increase of £8 per tonne per year. This will ensure that by 2011 the cost of landfill will be comparable to that of resource treatment technologies, enabling their delivery and the realistic recovery of much greater tonnages of materials, especially from commercial and industrial wastes.

The Group is also significantly represented in discussions on proposals for revisions to the Waste Framework Directive, and the associated Waste Protocols Project for priority waste streams and on proposals for greater coordination between resource efficiency organisations. Representatives of the Group continue to be active members of the Hazardous Waste Forum. The Group's current campaigns are focused on:

- Definitions of end-of-waste and of recovery, via the Waste Protocols Project
- Planning for facilities for secondary raw material production
- Waste minimisation and resource efficiency
- Lobbying for appropriate co-ordination of the initiatives required to achieve the objectives of the 2007 Waste Strategy.

The Group's Members supply technology and services to the waste minimisation, recycling, treatment and landfill industries, and include representatives from waste generators, waste management and recycling contractors, NGOs, consultants, geosynthetics manufacturers, water and air technology companies, local government and solicitors practices.

Water Pollution Control

The Water Pollution Control Working Group is working towards ensuring the sustainable development of the UK and water environment, through tackling the barriers to UK companies that can provide water pollution prevention and control technologies and services. Its Members consist of representatives from consultancies, technology providers, contractors, pollution monitoring organisations, laboratories, academic institutions, and associated industries.

The Group's objective is to identify key regulatory barriers to growth facing the industry. We are working to overcome them by lobbying for relevant legislation, standards, regulations and economic instruments, as well as effective and consistent enforcement.

The Water Framework Directive forms the context for most of the Group's work. Defra and the Environment Agency will be grappling with its implementation for years to come. However there is great pressure to implement the Directive in the minimum way possible. The Group is engaging closely in the implementation process to argue for a proactive approach based on the case that high standards of water quality have economic benefits for the UK.

Following closely from the main Directive is the daughter Priority Substances Directive, which is key in setting chemical quality standards for the future. The Group is represented on the main EU expert Working Group supporting its development as well as influencing the UK negotiating position. Much of the implementation of these Directives - as well investment in the broader water environment - comes through the five yearly periodic review of water prices. This process has tended to lead to a short term and conservative approach in the water sector and has created a boom and bust cycle for the supply chain to the water industry. The Group has been pressing Ofwat and Defra for measures to tackle this cycle and promote long-term thinking. Linked to this lack of innovation is the urgent need for the water sector to tackle the challenge of climate change - particularly by greater efficiency in its water treatment works. The Group is, therefore, working on a paper on its experience of the barriers to energy efficiency.

The pace of change in the policy and regulatory framework governing the water environment continues unabated. The coming year will see the Group continuing to provide an active voice for the sector providing the technologies and expertise to enable the challenges ahead to be met.