

Charging Consultation Response
Natural Resources Wales
Ty Cambria
29 Newport Road
Cardiff
CF24 0TP

Wednesday, 11 January 2017

Dear Sir or Madam

Natural Resources Wales Consultation on our Fees and Charges for 2017-18

We have received a copy of the above draft for comment as part of your consultation process.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 6,000 waste and resources management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste and resources management industry and has various grades of membership determined by education, qualification and experience.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste and resources management industry. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes and resources.

The Cymru Wales Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the Consultation on proposals for Natural Resources Wales' Fees and Charges Scheme for 2017-18.

CIWM Cymru Wales welcomes the fact that most charges raised by Natural Resources Wales for 2017-18 will stay at the current 2016-17 levels.

In relation to the current Consultation document, our points are provided as responses to the specific questions raised, in relation to the information received, as follows below and on the next page.

Question 1. What are your views on the proposed level of the Standard Unit Charge (SUC)?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.

Question 2. Are there any reasons why these changes would adversely affect Intensive Farming Operations in Wales?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.



Question 3. Are initial higher set up costs prohibitive to development or is the lifetime cost of the Intensive Farming Operation taken into account?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.

Question 4. What are your views on our proposal to change the approach for Band D, E and F performing EPR Waste Operations Facilities?

CIWM Cymru Wales recognises that this issue was part of the consultation on fees and charges 2016-17, in our response we stated that "CIWM supports the concept that where a site falls into the poorer performing categories and remains there for more than two consecutive years substantially higher fees and charges should levied." CIWM Cymru Wales is not surprised that the level of effort required to regulate a site to improve compliance performance far exceeds the income collected for that purpose. CIWM Cymru Wales supports the proposed increases in the compliance band multiplier for band D E and F sites and the 6-month review of the performance of these sites to examine whether these sites can move to a higher band to reflect the improvements in performance and therefore benefit from a reduction in fees during the year. It remains to be seen whether the sites that have been poor performers for a number of years can improve their performance on a continuous basis. CIWM Cymru Wales assumes that sites that improve their compliance on a temporary basis but fall back in subsequent periods would fall back into higher compliance multiplier charges in the following year, this is not stated in the consultation paper, so setting out some clarity on this matter would be welcome in the final published scheme.

Question 5. What are your views on the proposed level of charges for registration and risk designation?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.

Question 6. What are your views on a tiered risk-based charge for annual compliance monitoring and the level of these charges?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.

Question 7. What are your views on the approach to require multiple parties to apportion costs between them?

CIWM Cymru Wales has no comments on this aspect of the fees and charges scheme.

Question 8. What are your views on the arrangements for pre-application advisory services and do you believe they are beneficial to the applicant, leading to better quality applications?

The provision of Pre-application advice will be beneficial to waste facility applications where the proposal is difficult in terms of compliance with regulatory standards. This would also be beneficial where the applicant does not have access to the necessary technical knowledge to construct an application containing the necessary level of detail. Provision of this advice will assist with the application process and reduce the frequency with which NRW staff has to require additional information in order to be able to determine a permit.

Question 9. What are your views on standardised agreements for the provision of the service and are they preferable to application specific negotiations?

Both standardised agreements and site specific negotiations may be necessary. There may be areas that are commonly poorly addressed by applicants from specific sectors for the necessary permits that would benefit from a standardised approach. There may also be specific applications that would benefit from a negotiated approach; these would typically be complex applications from specific industry types.



Question 10. If NRW offered a concessionary rate, under what circumstances should the concession be applied?

Concessionary rates may be appropriate for pre-application advice requests for applications from charitable incorporated organisations (CIO), charitable companies (limited by guarantee), unincorporated associations or trusts.

CIWM Cymru Wales supports intention for NRW to start rolling out the charged for service regarding discretionary advice on development planning matters from 1 April 2017 onwards as consulted on in 2016.

Should you have any query with regards to our response, please do not hesitate to contact us.
Kind regards

Celine Anouilh
CIWM Regional Development Officer for Wales

For CIWM Cymru Wales

