



## WALES WASTE MEASURE 2010 SITE WASTE MANAGEMENT PLANS – CONSULTATION RESPONSE

### INTRODUCTION

1. The UK Environmental Law Association (UKELA) aims to make the law work for a better environment and to improve understanding and awareness of environmental law. UKELA is committed to encouraging the formulation of environmental law that is coherent, integrated, and transparent. UKELA's members are involved in the practice, study and formulation of environmental law in the UK and the European Union. UKELA attracts both lawyers and non-lawyers and has a broad membership from the public and private sectors.
2. UKELA prepares advice to government with the help of specialist working parties. In 2012, UKELA created Gweithgor UKELA ar gyfer Cymru, UKELA Wales Working Party which takes a particular interest in environmental law and policy developments in Wales. This response has been formulated with the assistance of that working party and with additional input from the Waste Working Party.
3. UKELA welcomes the innovative approach being taken to waste management by the Welsh Government and makes the following comments by way of response to the consultation.

### GENERAL OBSERVATIONS

4. UKELA welcomes any measures that result in the better management of waste and closer adherence to the Waste Framework Directive's waste management hierarchy. However, UKELA is conscious of the fact that the Site Waste Management Plans Regulations 2008 (SI 314) implemented in England are listed for possible revocation under the government's "Red Tape Challenge" Initiative, though this is not yet decided. The consultation and accompanying evidence states that the lessons learnt from the implementation of England's regulations have been taken into account when preparing policy in Wales and the 'Evidence base and Annexes' document clearly indicates precisely which factors have been taken into

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



account in the formulation of the Welsh regulations. Paragraph 1.24 states that “Despite these issues [the failings of the English system], there is strong evidence that SWMPs work. The benefits, i.e. costs savings, reduced emissions to the environment, arising from carrying out a SWMP have been estimated in the Impact Assessment that accompanies this consultation.” However, the Impact Assessment itself (at p.8) points out that

“The benefits of SWMPs [are] largely subjective. Post implementation studies [reference omitted] have examined the use of SWMPs in England. These studies, do not provide evidence that conclusively supports, or enables us to well understand the relationship between the use of a SWMP and accurately predict change, such as a reduction in costs or an improvement in waste management and environmental outcomes.

An explanation for this is that SWMPs do not necessarily, in themselves, demand much of those using them. For example, where SWMPs are used simply to record waste management decisions, it is unlikely that significant changes in behaviour will result. Furthermore, existing incentives such as landfill tax are already (and continually) driving changes in behaviour that might otherwise have been money-saving responses to the introduction of SWMPs.”

Given this conclusion, UKELA expresses some reservations as to the extent to which addressing the perceived difficulties of the English experience will necessarily, of itself, result in a more effective set of regulations in terms of environmental improvement, though they may well be more enforceable and will undoubtedly capture more projects than their English counterparts. UKELA would like to have seen more clarity as to what the regulations are intended to achieve over and above what has already been achieved by, for example, landfill taxation and whether the current draft regulations do enough to ensure that better waste management decisions are *actually* made, particularly by smaller developers. UKELA considers that SWMPs could have an important role to play in fostering better design and decision-making in respect of waste management among smaller developers but care needs to be taken to avoid generating a mere ‘tick-box’ exercise which was largely the experience in England.

5. UKELA welcomes the imposition of mandatory requirements on the principal contractor/client in respect of reporting the re-use, recycling and recovery of C&D waste. However, UKELA questions whether the omission from the mandatory requirements of details of waste minimisation at the design and planning stages is appropriate (p.11 of the guidance document; p.10 of the consultation document.) This is particularly so given that



waste minimisation at the design stage is much the most efficient means of waste management and waste prevention occupies the top tier of the waste hierarchy. Moreover, inclusion in the preamble to a SWMP of details of how waste minimisation was considered when the project was designed might enable a better estimate to be made of the savings to the Welsh economy when reviewing the operation of the regulations, as well as fostering a change of behaviour in designers and architects. Given that it is to be “strongly recommended that the Designer considers the opportunities for waste prevention and minimisation” (*ibid.*) it seems little more onerous to require these considerations to form part of the SWMP itself.

## RESPONSES TO SPECIFIC QUESTIONS

### SETTING THE SCENE

Question 1: The Welsh Government welcomes your views on the draft regulations as a whole and whether (a) the definitions are clear (b) roles and responsibilities are clearly outlined, including who is responsible when an offence has been committed (c) the proposals in the consultation document are met sufficiently (d) there are any other matters that need defining?

6. The draft definitions appear clear enough for the purposes of interpretation of the regulations. Roles and responsibilities (including for offences) are clearly outlined. It is difficult to assess fully whether the draft regulations will satisfy all the proposals set out in the consultation document since at least part of this assessment can only be undertaken once the regulations are in operation. We submit some more detailed observations in this regard at [13,21 & 31] *infra*.

### KEY PLAYERS

Question 2: What are your views on placing responsibility for producing and complying with a SWMP fully on the Client?

7. UKELA considers it appropriate that production of the SWMP and responsibility for complying with the regulations should fall on the client. In the majority of projects the client will no doubt take advantage of Regulation 4(1) in any case so that the principal contractor

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



will bear the practical day-to-day responsibility. However, the proposed regulations will capture a significant number of smaller projects undertaken by small operators or householder clients undertaking work themselves (such as a loft conversion or cellar extension.) Such persons may not have the requisite degree of training or knowledge to discharge their duties and might be unwilling to pay the local authority for the advice necessary to do so (as envisaged in Regulation 4 of the draft Charging Scheme.) UKELA is concerned that this might pose considerable enforceability difficulties in respect of these smaller projects. Some suggestions in respect of smaller projects *infra* at [18].

Question 3: Do you agree with the Welsh Government’s proposals for roles and responsibilities?

8. Given the almost complete lack of enforcement that followed the implementation of the English regulations owing to the confusion as to whether the Environment Agency or the appropriate local authority bore the responsibility for enforcement, UKELA welcomes the clear proposal that “the enforcement authority for SWMPs in Wales should be the local authorities.” UKELA takes no view on whether Building Control services is the most appropriate arm of local government to take on this role. We would, however, point to the experiences of Brighton and Hove City Council – generally thought of as the best of the English authorities in implementing the 2008 Regulations – who preferred to use the Planning Enforcement arm of the Council for this purpose (see *Site Waste Management Plans – a Local Authority initiative to practical enforcement* (2011), available at [http://www.secbe.org.uk/documents/brighton\\_swmp\\_enforcement\\_case\\_study.pdf](http://www.secbe.org.uk/documents/brighton_swmp_enforcement_case_study.pdf).)
9. The role of National Resources Wales (formerly the Environment Agency) in providing advice on waste enforcement matters will be important in the initial months and years of the scheme given that most of the waste enforcement expertise was moved from local authorities to the Environment Agency in the years after 1996. UKELA considers that this input will be instrumental in generating confidence and capability among local authorities in “pushing back” on SWMPs if they are not satisfied with them.

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



### **STEP-BY-STEP PROCESS**

Question 4: The Welsh Government seeks your views on the proposals and the step by step process that has been outlined for the SWMP system.

10. UKELA considers the step by step process sufficiently clear though we would draw your attention to paragraph 5 of our general observations above in relation to the input from project designers in respect of waste minimisation. The number of steps requiring the involvement of the enforcing authority seems to represent a considerable additional burden on local authorities, particularly given that the number of projects likely to be encompassed by the regulations will be very much higher than was the case in the English regulations.
11. The turnaround time for initial SWMPs and those rejected as not satisfactory will need to be as short as possible in order to prevent the introduction of delays into the process, particularly as the proposals make it clear that any client or principal contractor that chooses to take the risk that their plan is compliant and starts construction or demolition will be in breach if their plan is subsequently rejected. For SMEs such delays could be a serious economic matter given the low margins that most construction projects operate under at the outset. Care will need to be taken that this scheme does not militate against the economic well-being criteria articulated in the recent Sustainable Development Bill consultation.

### **TYPES OF PROJECTS REQUIRED TO PRODUCE A SWMP**

Question 5: Do you agree with the Welsh Government's proposals?

12. It is envisaged that the additional burden of a large number of relatively small projects caught by scoping them according to the criteria in draft regulation 5(2) will be offset by the provision of simple, standard and extended SWMP models. UKELA accepts that these criteria probably represent a fairer system than the financial threshold system used in England. The Welsh government expects that the criteria will capture 12833 p.a. projects requiring standard plans and 9442 p.a. requiring simple plans (Table 4 of consultation document). However, reference to draft regulations 7 and 8 does not reveal much difference in information required for these different types of plans, either quantitatively or qualitatively

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



(at least for the initial submission, though there are more onerous requirements for standard plans after three months.) This seems to UKELA to cast into doubt the contention that the use of simple plans for smaller projects will make the system more manageable for the enforcing authorities.

13. UKELA also has some misgivings about the extent to which, in practice, the smaller projects undertaken by small businesses and householders will be incentivised to deal with waste higher up the waste hierarchy. There is a requirement under both regulations 7 and 8 to indicate *how* waste will be dealt with, but there seems to be no requirement to deal with it more responsibly in Waste Framework Directive terms. They may simply choose to dispose of waste, and provided they do so legally, there seems to be no incentive to think of alternative management strategies higher up the waste hierarchy. Larger projects will no doubt embrace this (and most large firms do this anyway) because of the savings that can be achieved and the enhanced competitiveness of tenders that will result. For smaller, more marginally profitable operations, the incentive would appear concomitantly smaller.

Question 6: Do you agree with the proposed exemptions and the nature of the exempt activities as outlined above?

14. UKELA broadly agrees with these, subject to the comments on thresholds in [16-18] *infra*.

Question 7: Are there any other type of projects or activity that the Welsh Government should consider exempting from the SWMP Regulations?

15. UKELA has no additional project types or activities to add.

Question 8: Is the monetary threshold of £50,000 appropriate for projects undertaken by Highway Authorities/Statutory Undertakers? If not, please suggest an alternative value and provide reasons for your view.

16. This does seem a bit odd given that financial thresholds were rejected as a means of scoping SWMP projects for other types of projects (consultation document at [7.9] to [7.12].) Thus the logic of the proposed introduction of a £50,000 threshold in [7.13] seems counterintuitive in the light of the preceding discussion.

17. As stated in [7.13], “[w]orks carried out by these bodies ... may produce considerable amounts of waste” and hence “ the Client [Statutory Undertaker or Highways Authority] shall

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



be subject to the requirement to produce a SWMP, unless the total cost ... is valued less than £50,000". This is difficult to reconcile with [7.10] which states that "the cost of a Project may not be closely related to the volume of waste it produces." In UKELA's view a more logical threshold for projects carried out by Statutory Undertakers or Highway Authorities would be the estimate of the quantity and/or quality of waste likely to be generated.

Question 9: Should a threshold be applied to exclude from the SWMP Regulations very small works that fall within the Building Regulations/Planning permissions regimes? If so, please suggest the type of threshold and level at which it should be set.

18. Given that the regulations will generate an additional burden for enforcing authorities it would seem appropriate to screen out very small works as they are likely disproportionately to "clutter up" the scrutiny process. UKELA suggests that a suitable threshold might be available by adjusting the threshold scores associated with Table 5 of the consultation document (if indeed this table is to be used ultimately - see paragraph 19 *infra*). The addition of an extra 'Score 0' column between the current 'Metric' and 'Score 1' columns with values suitably chosen to screen out very small projects, and then exempting any projects scoring less than 4 might be a way forward. It might be appropriate only to permit a zero score for the 'Expected column of waste' metric, since it is waste volume that is the most significant metric. The corresponding regulation 6 in the draft regulations would need amending accordingly. The table might look something like:

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.

Metric	Score 0	Score 1	Score 2	Score 3	Score 4
Duration of construction phase	N/A	< 3 months	>3 - < 12 months	>12 months	N/A
Expected volume of waste	<10m <sup>3</sup>	≥10m <sup>3</sup> < 20m <sup>3</sup>	>20 - < 100 m <sup>3</sup>	>100 - < 500m <sup>3</sup>	>500m <sup>3</sup>
Area	N/A	< 100m <sup>2</sup>	>100m <sup>2</sup> - < 500m <sup>2</sup>	>500m <sup>2</sup>	N/A
Estimated cost of project	N/A	< £200,000	>£200,000 - < £1m	>£1m	N/A

#### SWMP CATEGORIES

Question 10: The Welsh Government seeks your views on the proposals in this section including the approach to determine the bands and scores and its scoring thresholds.

19. UKELA considers that the scoring table has the merit of making it relatively straightforward to determine which class of SWMP is required. However, it might be questioned whether the most important metric – volume of waste – is sufficiently weighted in relation to the other criteria. After all the SWMP proposal is principally a waste reporting measure and thus the quantity of waste produced is surely a more critical metric than the cost of the project, the area it covers, or the time it will take (though it is accepted that these may indirect measures of waste volume.)

Question 11: The Welsh Government seeks your views on the proposals for an Extended SWMP, including the criteria laid out for Extended SWMP projects.

20. UKELA considers this a sensible approach which will avoid unnecessary duplication of effort though the statutory guidance on extended SWMPs ([6.26-6.29] of guidance document) might require some additional guidance on the degree of ‘similarity’ between projects necessary to engage the extended SWMP model.

#### CONTENT OF A SWMP

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.





Question 12: The Welsh Government seeks your views on the proposed content of a plan and whether other information is required in the plans.

21. UKELA considers that, like the English counterparts of these regulations, the requirements in the proposed regulations are essentially reporting requirements. We welcome the requirement to give reasoned justification for waste management decisions but we would make two observations in this regard. Firstly, the exclusion of this requirement from simple SWMPs does not seem very consistent with the primary rationale for these regulations put forward in the ministerial foreword. Secondly, it is not clear whether, even in a standard SWMP, a failure adequately to provide a reasoned justification for waste management decisions would be grounds for an enforcement authority to reject the SWMP. Certainly the regulations relating to enforcement, offences and penalties listed in the draft regulation do not appear to make any such provision. This being the case, UKELA wonders whether the goal of making “developers and contractors in the construction and demolition sector think before the start of a project about the waste that will be produced, how to reduce the waste and plan to sustainably manage waste that does arise” (paragraph 3 of the Ministerial Foreword) will be effectively encouraged by the legal requirements of the draft regulations themselves. We can see that as a means of enforcing a reporting requirement the regulations may well be effective; as a means of changing behaviour (particularly among those operators who are not already doing this) and driving waste up the waste hierarchy set out in the Waste Framework Directive, we are less confident. Hence UKELA suggests that either the draft regulations should be amended to strengthen the enforcement of adherence to the waste hierarchy or that local guidance will need to make it clear that insufficient attention to the waste hierarchy could be grounds for refusal to sign off the plan. For example, the local plan formulated by Brighton and Hove city council makes it clear that “Planning permission will not be granted for developments which cannot demonstrate that the minimisation and reuse of construction industry waste has been sought in an effective manner.” (2005, Brighton and Hove City

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



Council Local Plan, chapter 2, p.64; available at <http://www.brighton-hove.gov.uk/index.cfm?request=c1000488>)

#### **FEES AND CHARGING SCHEME**

Question 13: The Welsh Government seeks your views on the proposals of the fees and charges scheme for SWMPs.

22. In principle, UKELA would not necessarily object to a fees and charging scheme, but in the absence of actual figures, it is difficult to make any meaningful comments. At the risk of truism, the scale of the charges and their perceived fairness will be crucial to the successful operation of the regulations.

#### **ENFORCEMENT**

Question 14: Do you consider the General Regulatory Chamber of the First - tier Tribunal and its rules to be appropriate for the handling of these appeals against civil sanctions? If not, please state the reasons as to why and list any changes proposed to the rules with reasons.

23. UKELA considers this an appropriate forum for such appeals. The first-tier Tribunal already considers civil sanction appeals in other areas of environmental regulation (such as permitting appeals), so it seems sensible, logical and consistent for the present civil sanctions appeals to be dealt with by the same tribunal and subject to the same rules.

Question 15: The Welsh Government seeks your views on the proposals outlined in this section and whether the range of breaches listed in Table 8 and associated proposed penalties/civil sanctions are appropriate for the SWMP regulations in Wales.

24. UKELA considers these to be broadly comparable and consistent with the use of such penalties and sanctions in other areas of environmental regulation. However, experience in England is that it is helpful for civil sanctioning and enforcement powers to be set in the context of a more general policy on enforcement, i.e. dealing with the kinds of factors that regulators will have regard to when choosing between sanctions. Such a policy may already exist in relation to Local Authorities in Wales but if not UKELA suggests that one should be devised. Whilst Table 8

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



of the consultation document usefully gives the ‘indicative penalty’, without anything more there is an apparent tension between what otherwise seems like a rather rigid, short list in Table 8 (only cites one civil sanction even though other options may be available besides prosecution) and the more flexible language used in paragraphs 11.6-11.12. Otherwise Table 8 might inadvertently become an extra fetter on regulator’s discretion as to choice of sanction. Also, ‘after a process’ seems a bit odd. Is this a reference to the processes already built into civil sanction legislative provisions (2 stage process; scope for enforcement undertakings etc), or something more? Again, a danger that this could make operation of civil sanctions less straight-forward, and make FMPs less effective – their main value, after all, is as light touch, easy-to-administer penalties. Dealing with the practical procedural approach in enforcement and sanctioning guidance would help clarify this.

Question 16: Your views are sought on what additional breaches, if any, should be considered for the SWMP regulations and any appropriate penalties/sanctions for that breach.

25. Refer to our comments on strengthening enforcement in respect of demonstrating consideration of the waste hierarchy in [13 and 21] *supra* and, particularly, [31] *infra*.

#### **RECORD KEEPING REQUIREMENTS**

Question 17: Do you agree with the record keeping options proposed? If yes, which option would be your preference? If no, what alternative would you suggest?

26. UKELA would consider option 4 to be the most cost effective provided the operational data mentioned are readily extractable.

Question 18: Do you agree with the Welsh Government’s proposals on transitional arrangements?

27. It is difficult to comment on whether the time scale is appropriate without knowing more about the logistics of setting up the administrative and enforcement provision. The best we are able to say is that time scales appear comparable with the introduction of previous similar regulatory schemes.

Question 19: The Welsh Government may seek an opportunity through the future Environment Bill to seek additional powers on SWMP and any legislation which may impact on waste management practices in the

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



C&D sector. Your views are welcomed on whether additional powers are needed on SWMP, or management of construction waste.

28. N/A

Question 20: Having considered the Impact Assessment, do you:- (a) agree with the key assumptions and findings? (b) know of any data which may improve and inform assumptions within the Impact Assessment; (c) consider if any other issues relevant to the costs and benefits of this regulation that should be considered in the Impact Assessment; (d) know of other options not considered in this Impact Assessment which would achieve the desired objectives.

29. See comments under [4] *supra*.

Question 21: The Welsh Government welcomes your views on the draft statutory and non-statutory guidance and whether additional changes/information is required.

30. The statutory guidance might also better reflect the need to enforce better decisions in relation to the waste hierarchy ([13] and [21] *supra*.)

Question 22: The Welsh Government has asked a number of specific questions. If you would like to comment on any specific actions, or raise any issues which you feel that the Welsh Government has not fully addressed, please provide your input under this question.

31. If reporting of waste decisions is all that is aimed for (not to say that this is not a worthy aim and one that will certainly improve the ability to track waste from its generation to next use or final disposal), much of what is required seems already to be required by s.34 of the Environmental Protection Act and its related provisions; the simple SWMPs in particular appear to require little more than is already required of most operators in other legislation. UKELA also questions whether the same aims could have been achieved by amending building regulations and planning conditions rather than drafting a new set of regulations. Secondly, the draft regulations' enforcement, offences and penalties provisions are aimed principally at enforcing reporting and record keeping (together with the usual obstruction, falsification and requirements to cooperate provisions); there seems to be little, on the face of it, that even exhorts, let alone enforces, better waste management decisions (despite the key objective put forward in the first bullet point of section 1.2. of the impact assessment (*compliance with the requirements of the revised EU Waste Framework Directive, including the requirement for management of waste to be focussed higher up the waste hierarchy,*

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.



*with far greater attention paid to waste prevention, preparing for reuse and recycling*). The only provision that appears to *require* re-use, recycling or recovery is clause 1(4) of Schedule 2 (*The principal contractor must ensure, so far as is reasonably practicable, that waste produced during construction is re-used, recycled or recovered* [the absence of *reduced* or *minimized* is notable]) but a failure to comply with this provision does not appear from Regulation 20 to be an offence. It may be grounds for an SWMP to be refused but we reach this conclusion by implication rather than by reference to any explicit statement in the consultation documents to that effect. This requirement seems particularly important given the place that SWMPs occupy in the Waste Prevention proposals that the Welsh government has recently been put out to consultation and would, we believe, be vital in making these provisions fit for their stated purposes.

32. The aim is contribute to Wales' sustainability & One Planet agendas through encouraging better waste decisions but UKELA is not sure that these provisions, as they stand, will necessarily bring this about to a significant *additional* extent among those operatives that do not already undertake these activities as a matter of commercial expediency or in response to existing tax incentives or charge remissions.

Date: 25<sup>th</sup> April 2013

On behalf of Gweithgor UKELA ar gyfer Cymru UKELA Wales Working Party

Contact Details:

Haydn Davies  
Gweithgor UKELA ar gyfer Cymru  
UKELA Wales Working Party  
School of Law  
Birmingham City University  
Perry Barr  
Birmingham  
B42 2SU  
Tel: 00 44 (0) 12 13 31 67 03

UK Environmental Law Association: making the law work for a better environment

Registered charity 299498, company limited by guarantee in England 2133283  
Registered office: City Point, One Ropemaker Street, London, EC2Y 9SS [www.ukela.org](http://www.ukela.org)

President: Rt. Hon. Lord Carnwath of Notting Hill C.V.O.