

Date: 17th October 2012

Sent via email to: EnvironmentalReporting&Skills@defra.gsi.gov.uk

Dear Sirs,

MPA response to the consultation “Reporting Guidance for Business on Environmental Key Performance Indicators: a consultation on Guidance for UK Businesses”

Thank you for informing the Minerals Products Association of the consultation document- “Reporting Guidance for Business on Environmental Key Performance Indicators: a consultation on Guidance for UK Businesses”.

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Although the majority of industry firms are not required to report under the Companies Act 2006, we are aware that there is a separate chapter for aggregates under the Key Performance Indicator- Materials. BMAPA (British Marine Aggregate Producers Association), part of the MPA family, have submitted a separate response that provides additional detail on the specific points related to the marine aggregates industry.

General Feedback

Although it is beneficial to provide guidance to help businesses and public bodies in the UK in identifying and reporting their significant environmental impacts, many Trade Associations and individual companies produce separate guidance on KPI’s relevant to their sector. In most situations these documents will be more relevant than the guidance provided in the Defra document. We would consider that this development of sector specific indicators in a number of industries should be in the opening paragraph of “Part III: Reporting Guidance for businesses on Environmental Key Performance Indicators”. MPA has produced Sustainable Development information and data for the sector for a number of years, for examples please refer to the Sustainable Development micro site on www.mineralproducts.org.

Detailed Comments

Chapter Four Key Performance Indicator- Materials

Although the extraction of minerals often temporarily disrupts natural habitats it is often the case that the site can be restored to a more biodiverse habitat. Planning conditions will state the restoration scheme post- extraction and this will often entail creating a wildlife habitat which in nearly all cases will provide an equal biodiverse habitat, if not greater, than what was there before. We consider that the opportunities provided by extraction to biodiversity need to be recognised so that there is a balanced view of the extraction and restoration cycle.

Through discussions with Defra the amount of waste created through extraction has been recalculated. It is now evident that a lot of the material that was classified as waste is indeed not waste. These discussions and revised statistics require recognising- this new data confirms that quarrying produces much smaller volumes of waste than previous reported. In most situations any material that is produced during the extractive process that is not used as aggregate will be used as restoration material- this has now been recognised in the revised figures.

It is noted that the document refers to the Aggregates Levy and the levies aim to “bring about environmental benefits by making the price of aggregates better reflect these costs and encouraging the use of alternative materials such as recycled materials and certain waste products”. Recycled and secondary materials aggregates can replace virgin aggregates for certain applications. The use of these materials now account for 30% of the GB aggregates market, over three times higher than the European average and it is generally recognised that most recycled and secondary materials which could be used in aggregates markets are already in use. It should also be noted that the great majority of recycled materials were already in the aggregates market before the aggregates levy was introduced in 2002. The impact of the Landfill Tax is likely to have been far more significant in encouraging the use of recycled materials than the Aggregates Levy.

The scrapping of the Aggregates Levy Sustainability Fund by Defra in 2011 means that aggregates levy funds are no longer available for use for local community and sustainability projects, therefore ending the main mechanism by which the aggregates levy generated environmental benefits.

Chapter 2 Key Performance Indicator- Water

Throughout extraction water will be moved from the quarry sump to, in most situations, a near by surface water body. By managing water in this way the mineral can be extracted dry- a safer and more efficient way to work. In comparison a small amount of water will be used to prepare the final product.

It is also important to note that not all operations are able to re-locate to areas where more water is available. Minerals can only be worked where they lie and this should be recognised in the document.

Chapter Five Key Performance Indicator- Waste

After extraction many quarries are restored using inert waste material. In Defra's Review of Waste Policy (June, 2011) -

"...there will be some wastes for which landfill remains the best or least worst option. These are likely to include:

- *Some "inert" materials and wastes, to restore quarries and mineral workings;"*

This statement needs to be recognised in the document- without inert waste to restore quarries there is a danger that future planning permissions will not be granted.

I hope you find our comments useful and informative, please do let me know if I can be of further assistance.

Yours sincerely,

Nicola Owen

Environment and Waste Policy Executive
Mineral Products Association