



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING
ADVISORY COMMITTEE

Defra
Environmental Permitting Consultation
Zone 5B, Ergon House
Horseferry Road
London
SW1P 2AL

27 July 2009

Dear Sir

Consultation Response – Environmental Permitting Programme and draft guidance on the Waste Batteries and Accumulators Directive 2009

I am writing to present the LARAC response to the Environmental Permitting Consultation and the draft guidance on the Waste batteries and Accumulators Directive, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC considers that the process of issuing core guidance on specific subjects is the way forward, as a way of ensuring easily understandable regulation. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me by phone on (01227-862247) or ian.mackenzie@canterbury.gov.uk.

Yours faithfully,

Ian MacKenzie

Name
LARAC Policy Team



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Consultation Response – Environmental Permitting Programme

**Q1 – does the guidance adequately explain the the relevant requirements of legislation?
YES**

Q2 – Is the format and structure of the guidance helpful? – YES

Q3 – Does the Radioactive Substances guidance adequately explain the relevant requirements of the regulations? – This subject is outside of the remit of LARAC so no comment is offered.

Q4 – Do you think the format of this guidance is helpful? – no comment offered.

Q5 – Does the Water discharge Activities guidance adequately explain the relevant requirements of the regulations? – This subject is outside of the remit of LARAC so no comment is offered.

Q6 – Do you think the format of this guidance is helpful? – no comment offered

Q7 - Does the Mining Waste Directive guidance adequately explain the relevant requirements of the regulations? – This subject is outside of the remit of LARAC so no comment is offered.

Q8 - Do you think the format of this guidance is helpful? – no comment offered

Q9 - Does the Batteries Directive guidance adequately explain the relevant requirements of the regulations? – Yes – see detailed comments to the draft regulations below.

Q10 - Do you think the format of this guidance is helpful? – Yes

Detailed comments on the Draft Guidance for the Waste Batteries and Accumulators Directive 2009

With regard to this document LARAC would wish to see greater clarity within the guidance, especially in relation to Schedule 18A, which although quoted is not reproduced for information or guidance.

The guidance also makes reference to the BERR website for further information. It might be of benefit if a précis of the information contained within the website was also included.