

3 October 2012

Sackey Bennin
Defra
Area 5C
Ergon House
Horseferry Road
London SW1P 2AL



Dear Sackey Bennin

CIEH's response to Defra's consultation on Reporting Guidance for UK Businesses on Environmental Key Performance Indicators

The Chartered Institute of Environmental Health welcomes the opportunity to comment on the proposed new guidance on environmental reporting. It is encouraging that existing guidance is being revised and updated to take account of developments since 2005. One such development is that the urgency of the need for more sustainable solutions to pressing economic, environmental and social challenges continues to intensify.

It must be more than a little disconcerting for businesses that there are numerous legal requirements, schemes and guides. This draft is separate from the guidance on reporting greenhouse gas emissions, which in turn is different from the BIS proposals for narrative reporting. The more legal measures can be consolidated and guidance harmonised, the better for businesses as well as for all those with an interest in compliance, including citizens, green groups and regulators.

The structure of the guidance is sound and the draft is well written.

Section 1 addresses arguments as to why businesses should be concerned about their environmental performance. It drives efficiency, which is in their self-interest, and there also much wider societal benefits in which businesses share. The thematic approach of five key environmental categories is sensible.

In Section 2, the step-by-step approach is helpful and the explanatory text for each step is mostly adequate. It might be helpful to dwell a little on why the five categories converts into 6 KPIs (it is because the greenhouse gas emissions reporting is in other guidance that this may appear confusing).

In the chapters discussing the five themes, or categories, the references to legislation are appropriate. Where guidance is being read electronically (which is nowadays very common) it is convenient to provide for links in situ which the reader can click on to learn more. However, we would still favour additional footnote references either at the foot of each page or at the end of each chapter.

Chapter 1 on air and other pollutants is good on "what to report" and "how to report" but weak on why it matters. Defra's usual formula, namely that air quality in the UK is generally good, is repeated. However, it is equally true, and warrants statement here, that in places air quality is unacceptably poor. The potential for causing harm to "local flora and fauna" is

mentioned but not more significant harm to humankind (for example preventable premature deaths) and the natural environment (for example acid rain).

In these respects, Chapter 2 on water is better, more rounded.

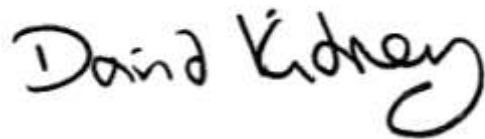
Inevitably there is some cross-over between these two themes, or categories, and Chapter 3's discussion on biodiversity and ecosystem services. The guidance is appropriate and helpful and we specifically endorse the referencing of Biodiversity Action Plans.

Chapter 4 on materials is mostly appropriate and helpful. We endorse the consistent referencing of Environmental Impact Assessments and would comment that an additional reference to the EIA approach is essential in the very short passage about "fracking".

Chapter 5 on waste would benefit from a fuller discussion of the waste hierarchy in the context of business decision-making and the growing impact of the costs of sub-optimal utilisation of resources. Indeed, the guidance might be improved by the inclusion of a discussion of the "circular economy" model and what businesses and their supply chains can do to maximise resource utilisation and minimise waste.

The CIEH would welcome ongoing involvement in finalising the guidance and helping to promote it once it is published.

Yours faithfully

A handwritten signature in black ink that reads "David Kidney". The signature is written in a cursive, slightly slanted style.

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Head of Policy

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