

Response ID ANON-SZNK-ZPRJ-C

Submitted to Consultation on our regulatory fees and charges for 2025/2026
Submitted on 2025-01-10 13:11:35

Introduction

1 Are you responding as an individual, a business or an organisation?

Individual

If Other, please specify below:

Trade Association

If you are responding on behalf of a business or organisation and you would like to tell us who this is, please give the name in the box below:

Members of Fuels Industry UK

2 To help us understand your point of view and sector impacts more fully, please indicate which business sectors apply to you:

Email:

simon.wood@fuelsindustryuk.org

Manufacturing, Transport and storage

3 Do you currently hold a licence, permit or consent issued by NRW?

Yes

4 In understanding your answers, it would be useful for us to know where you live or work. Which geographic area applies to you?

South West (Carmarthenshire, Neath Port Talbot, Pembrokeshire or Swansea)

General Questions

5 To what extent do you agree or disagree that NRW's regulatory services should be paid for by those who use them and not by the taxpayer or other charge payers?

Neither disagree or agree

6 Do you think there are any better alternatives to how NRW proposes to fund its regulatory activities?

Neither disagree or agree

UK Emissions Trading Scheme (UK ETS) charging proposals

7 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for UK ETS?

Neither disagree or agree

8 Are there any other comments that you would like to provide in relation to our proposed UK ETS charging proposals?

Are there any other comments that you would like to provide in relation to our proposed UK ETS charging proposals?:

Fuels Industry UK is aware of the Welsh Governments ongoing activity to refocus its resources on actions that will have the most impact on nature, climate, and minimise pollution. We support NRW recovering the cost for this work which is highly complex and requires additional effort to review and make decisions. It is fair to expect that NRW should be reasonably remunerated by operators for its work.

Fuels Industry is aware that in some cases, additional work is created through NRW and its consultants undertaking additional analysis that goes beyond what is perceived to be reasonable and proportionate. Monitoring data will have already been accurately quantified, at the operators expense, by an independent verifier from an NRW approved list prior to submission. Occasionally during the UK Emissions Trading Scheme (UK ETS) reporting and verification process, operators see the level of analysis by NRW and its consultants go beyond reasonable and proportionate.

Fuels Industry UK believes that it is fair for operators to expect that the charges for verification of UK ETS emissions will be fair and proportionate.

Waste Standard Rules Permits (Environmental Permitting Regulations)

9 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for Waste Standard Rules permits?

Neither disagree or agree

10 Are there any other comments that you would like to provide in relation to our charging proposals for Waste Standard Rules permits?

Are there any other comments that you would like to provide in relation to our charging proposals for Waste Standard Rules permits?:

Fuels Industry UK has no comment in relation to the charging proposals for Waste Standard Rules permits.

Green List Waste

11 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for Green List Waste?

Neither disagree or agree

12 Are there any other comments that you would like to provide in relation to our charging proposals for Green List Waste?

Are there any other comments that you would like to provide in relation to our charging proposals for Green List Waste?:

Fuels Industry UK has no comment in relation to the charging proposals for Green List Waste.

Hazardous Waste Premises Notification Charge

13 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for Hazardous Waste premises notification?

Neither disagree or agree

14 Are there any other comments that you would like to provide in relation to our charging proposals for Hazardous Waste premises notification?

Are there any other comments that you would like to provide in relation to our charging proposals for Hazardous Waste premises notification?:

Fuels Industry UK has no comment in relation to the charging proposals for Hazardous Waste premises notifications.

Water Industry Act (WIA) s166 a/b 5-year Scour valve release renewals

15 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for s166 a/b Scour valve release renewals?

Neither disagree or agree

16 Are there any other comments that you would like to provide in relation to our charging proposals for s166 a/b Scour valve release renewals?

Are there any other comments that you would like to provide in relation to our charging proposals for s166 a/b Scour valve release renewals?:

Fuels Industry UK has no comment in relation to the charging proposals for s166 a/b Scour valve release renewals.

Water Resources – Same / Different terms renewals

17 Having considered our proposals and supporting information, to what extent do you agree or disagree with our proposed definitions and associated charges for same and different terms renewals?

Neither disagree or agree

18 Are there any other comments that you would like to provide in relation to same and different terms renewals?

Are there any other comments that you would like to provide in relation to same and different terms renewals?:

Fuels Industry UK has no comment in relation to the charging proposals in relation to same and different terms renewals

Species licencing charging proposals

19 Having considered our proposals and supporting information, to what extent do you agree or disagree with our charging proposals for species licencing?

Neither disagree or agree

20 Are there any other comments that you would like to provide in relation to our proposed species licencing charging proposals?

Are there any other comments that you would like to provide in relation to our proposed species licencing charging proposals?:

Fuels Industry UK has no comment in relation to the charging proposals in relation to the proposed species licencing charging proposals.

Proposed break-even and inflationary increases to regimes in deficit

21 Having considered our proposals and supporting information, to what extent do you agree or disagree with our proposed break-even and inflationary increases to regimes in deficit?

Neither disagree or agree

22 Are there any other comments that you would like to provide in relation to our proposed break-even and inflationary increases to regimes in deficit?

Are there any other comments that you would like to provide in relation to our proposed break-even and inflationary increases to regimes in deficit?:

Fuels Industry UK understands the challenges of delivering the range of regulatory services and the complexities associated with recovery of the costs for the delivery of regulatory services for regulated business.

The majority of businesses whose activities have an impact on the environment require an environmental permit to carry out those activities. The current environmental permitting process can be lengthy (e.g. new application or a variation) and is not designed to support new and innovative activities that currently sit outside the BAT conclusions scope.

The current regime does not enable trials of new technologies, processes or products that could support decarbonisation and the circular economy without undertaking a permit variation. Indeed, multiple variations may be required as projects develop or are replaced. Furthermore, there is no benchmarking of new technologies, processes or products that have gone through the permitting process that businesses can refer to, either within the same industry or in other industries.

We agree that charges for certain activities should increase based on the level of activity to deliver the service. It is also fair to work to the principle that the greater the environmental risk, the more resource is expended and the greater the cost to be recovered through charges.

However, Fuels Industry UK believes that with an increase in charges, there needs to be visible improvements in the flexibility of the service to respond to innovation and the timeliness of delivery of the service. It would not be acceptable to raise these charges and deliver the same level of service with no visible improvement to the service provided.

Other

23 With regard to the "Other matters to note" section of the consultation document, do you have any specific feedback?

With regard to the "Other matters to note" section of the consultation document, do you have any specific feedback?:

Fuels Industry UK has no comment in relation to other matters.

Welsh Language Considerations

24 Could the proposals affect opportunities for people to use the Welsh language?

If yes, please explain in the box below:

25 Is there a way we can increase the use of Welsh or provide more opportunities for people to use the Welsh language?

If yes, please explain in the box below:

26 Are there any aspects of the proposals that could disadvantage people in using the Welsh language?

If yes, please explain the effects and how they could be mitigated:

27 Do you believe the proposals treats the Welsh language less favourably than the English language?

If yes, please explain in the box below: