

Consultation on our Fees

and Charges for 2019/20

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# 2 Introduction

Natural Resources Wales’ purpose is to ensure that our natural resources and environment are sustainably maintained, enhanced and used in a way that is good for people, good for the environment and good for the economy.

This means that our remit is wide and includes providing a range of regulatory services. We are required by Government to recover the costs of these regulatory services from those we regulate, rather than through general taxation. The fees and charges raised to cover regulatory costs account for approximately 20% of Natural Resources Wales total funding of £180m[[1]](#footnote-1).

We currently review our Fees and Charges Schemes on an annual basis to ensure we recover our costs and meet any technical requirements. When setting fees and charges, we follow the requirements set out in ‘*Managing Welsh Public Money*’ [[2]](#footnote-2) ensuring that only eligible costs are included within calculations. You can download a copy of our existing charging schemes from our website[[3]](#footnote-3).

We also review the way we work, ensuring our processes are efficient and effective, to keep charges as low as possible.

We regularly meet and discuss our proposals with the Charge Payers Consultative Group, consisting of various stakeholders from trade and representative organisations. This helps us to develop our charging strategy and schemes for the future. We would like to thank those in the group for their commitment in representing their members’ views and continuing to work with us in this way, now and in the future. We annually review the membership of this group to make sure we have members relevant to the changes proposed. A list of current membership is attached in Annex 1.

As well as following our regulatory principles[[4]](#footnote-4), the Regulators’ Code [[5]](#footnote-5)and Managing Welsh Public Money, we are committed to the following charging principles;

* transparency of our charging decisions
* avoidance of cross subsidy between regimes
* providing longer term planning horizons wherever possible
* avoiding cycles of cutting then raising charges by actively managing our surpluses and deficits
* keeping charges as low as possible through a continued drive for increased efficiency

Throughout our charging schemes we refer to two groups of charges: permitting charges and subsistence charges. Both these groups of charges are explained in our scheme guide. However, for clarity in the consultation document subsistence fees will be referred to as the Annual Compliance Monitoring Charge. This covers the cost of all work done by us to monitor and report compliance at places we regulate. Our compliance monitoring work includes, but is not limited to site visits, desktop reviews, maintaining the public register and providing technical advice and guidance.

We will keep under review any impact on our charges that the UK’s exit from the European Union (EU) may have in future especially in areas where our regulation is determined or influenced by EU legislation.

We are seeking your views and opinions on proposals for our fees and charges for 2019/20.

We are starting a strategic review of all our charging schemes and while we undertake this work, we intend to keep the review of charges to a minimum in the short-term. As a result of this, we have included the 2020/21 proposal for Abstraction’s Standard Unit Charge as part of this consultation.

**This consultation closes on 14 January 2019**. We will use the results to inform our final schemes. The statutory schemes will be submitted to Welsh Government for approval with the aim of introducing the new scheme from1 April 2019.

# Changes to our existing charges

We continually review our service delivery to ensure processes are as efficient as possible. We are continuing to develop our place-based approach to regulation, helping us deliver the outcomes needed for the Welsh environment and green growth, forming stronger connections with people and business. This enables us to seek to keep our fees and charges as low as possible.

We continue to develop our cost modelling to make our long-term cost base more certain and increase the transparency of individual schemes for our stakeholders.

## Key Messages

Since forming NRW we have avoided increases to charges and absorbed inflation where possible through efficiency savings. We are now under-recovering in some regimes and are therefore proposing increases to some charges. We will also need to increase the abstraction standard unit charge to cover infrastructure investment. Other proposals we are consulting on include changes to the hourly rate for the control of major accidents and hazards (COMAH) regulations, amendments to the medium combustion plant directive and introducing a fixed fee for assessing waste recovery plans. We are also making some policy changes which are outlined in this consultation under section 5, ‘Other matters to note’. All other statutory schemes will remain at 2018/19 levels.

After this annual review we intend to carry out a strategic review of our charging scheme to ensure regulation in Wales is sustainable and delivers long term outcomes. This is outlined in section 5.4 below. While we undertake this review our intention is to keep the annual review of charges to a minimum in the short term unless essential changes are needed.

# Changes and additions to Statutory Charging Schemes

This section deals with proposed changes and additions to our statutory charging schemes from 1 April 2019. In reviewing our approach to regulation, we have identified areas where we do not fully recover costs or need to make changes to how we regulate an activity.

## Increases to move towards full cost recovery

Since forming NRW we have avoided increases to our charges where possible through efficiency savings. We have previously had to increase charges for waste and installations. We have now identified under-recovery in some regimes and intend to move towards full cost recovery by increasing those charges. We intend to limit these increases to the rate of inflation for the 2019/20 scheme. To achieve full cost recovery in the future we intend to carry out a comprehensive strategic review of charges. The rate of increase for the 2019/20 scheme will be 2.4% (based on the Consumer Price Index (CPIH) at September 2018). The regimes we intend to apply this increase to are Waste, Installations, Material Recovery Facilities (MRF) and European Union Emissions Trading Scheme (EU ETS). The increase will be applied to application charges and subsistence fees.

**Question 1. What are your views on the proposed increase to Waste, Installation, Material Recovery Facilities and EU ETS charges?**

## Abstraction Standard Unit Charge (SUC)

The SUC was maintained in 2018/19 at the 2017/18 rate. We have been reviewing how to fund significant increases in Section 20 Reservoir Operating Agreement capital costs as well as other cost pressures through a joint review of funding options with Dwr Cymru Welsh Water (DCWW). We have a duty as far as is reasonably practicable to maintain with undertakers, secure and proper management of any reservoirs, apparatus or other works. This is to help safeguard water resource management. Changes to reservoir safety requirements and demand pressures have resulted in significant infrastructure investment of £23.5 million being needed over 8 years. For example, new legislative obligations relating to enhanced standards for infrastructure such as spillways, pipes and dams means upgrades are needed. The proposal is for this to be paid through the Standard Unit Charge account as per the terms of the Section 20 agreements.

To manage charge balances and avoid large increases in the short term the proposal is to smooth these costs over a longer timeframe, initially leading to increases in the SUC by +6.75% in 2019/20 followed by a further increase of +2% in 2020/21. Future increases beyond this time frame will also be required, given the scale of this programme.

**Question 2. What are your views on the proposed increase to the abstraction standard unit charge?**

## Control of Major Accidents and Hazard (COMAH) Regulations

NRW are one of five public bodies forming the Competent Authority to enforce COMAH in Great Britain. The regulations aim to ensure operators of specified activities put in place measures necessary for the prevention and mitigation of major accidents and prepare accident prevention policy. Our role includes assessing site safety reports, communicating findings, prohibiting activities if there are inadequate measures for preventing and mitigating accidents, inspecting sites, investigating accidents and designating some sites as ‘domino effect’ establishments.

NRW is required to recover costs for its regulatory activity. We do this using our hourly rate which has remained at £125 for a number of years. We have carried out analysis which identified under-recovery. We have carried out assessment of our costs and those of other regulators to develop our revised hourly rate. To fully cost recover we intend to increase our hourly rate for COMAH regulation to £152 which is in line with other UK regulators.

**Question 3. What are your views on the proposal to increase NRW hourly rate for COMAH regulation?**

## Waste Recovery Plan assessment.

When customers intend to use a waste material in place of a non-waste material in their operation (as it can perform the same function) they submit a Waste Recovery Plan to NRW. The plan must provide information to be able to demonstrate that the use of waste meets the guidance which clarifies what constitutes a recovery operation. NRW assess plans to determine if the activity meets the legal test of recovery as defined in Article 3 (15) of the Waste Framework Directive.

We have considered if this assessment could be provided through our Discretionary Advice Service and have concluded that it is a statutory role which only NRW can carry out. Our role is to determine if the activity meets the test of recovery and as such it is not advisory and could not be provided by any other party.

Currently a customer can either have their WRP assessed by NRW in a pre-application assessment or in permit determination. It is recognised that assessment in the pre-application stage can be helpful for both the customer and NRW as the decision may affect the type of permit which will be applied for. For this reason, it is often done during pre-application in case of an unfavourable decision which would undermine the application with which it was submitted.

As there is currently no charge for plans submitted during pre-application, we are under-recovering in situations where multiple plans are submitted, and no permit application is made or where a permit type has limited allowance within charges for pre-application advice.

Since January 2016, only 15% of WRPs submitted have been able to demonstrate recovery, with the remaining 85% assessed as disposal. Only 4% resulted in a paid application.

We are proposing to introduce a fixed charge of £800 to assess a new, varied or revised WRP. This charge is separate to any permit application charge.

**Question 4. What are your views on the proposal to charge a fixed fee for assessing a Waste Recovery Plan?**

## Medium Combustion Plant Directive (MCPD)

We included proposals for MCPD in our 2018/19 fees and charges consultation because operators of new plant need to be able to apply from 20 December 2018.

We based our proposal on the best available information at the time because the regulations were still being finalised late in 2017. We have developed new proposals for 2019/20 based on permit types which better reflect the MCPD and Specified Generator (SG) provisions.

Although these now differ from our original proposal we intend to apply these permit types for new plant from 20 December 2018. This approach is the most pragmatic because it avoids confusion and development of separate interim permits and guidance.

The charges as outlined in the 2018/19 scheme consultation will still apply for new plant from 20 December 2018 until 30 March 2019. We are not expecting a high number of applications for new plant during this period. For those who do apply in this interim period, we will work with them to understand the appropriate permit type even though pre-application advice was not originally included in last year’s proposals.

### Background

The Medium Combustion Plant Directive (MCPD) came into force on 15th December 2015 and was transposed into UK law in January 2018. The Directive seeks to improve air quality by introducing emission limits for key pollutants and by bringing within regulatory control all combustion plant in the 1-50MW input range. The emission limit values apply from 20th December 2018 for new plant and by 2025 and 2030 for existing plant, depending on their size, fuel type, age and operating hours. We currently regulate combustion plant on installations with an aggregated rated thermal input over 50MWth and those below 50MWth, which are part of EPR Part A1 installations as Directly Associated Activities. Local Authorities (LAs) regulate the 20-50MWth plants as Part B EPR installations.

The MCPD is transposed through the Environmental Permitting (England and Wales) Regulation 2016 (EPR2016). In addition, in England and Wales, further provisions are included for “specified generators” which will also require permits under EPR2016. These specified generators are combustion plant used to generate in the Capacity Market and are potentially short duration operation, but highly polluting (e.g. unabated diesel engines). The Capacity Market was introduced by Government and designed to ensure sufficient reliable sources of electricity are available by providing payments to encourage investment in new capacity or for existing capacity to remain open. These Capacity Market contracts are managed by the Department for Business, Energy and Industrial Strategy (BEIS) and are not devolved.

UK regulators will provide detailed technical guidance and definitions to help operators understand the extent and requirements of regulations. NRW are the sole regulator in Wales for these activities.

This activity comes under Section 41 Environment Act 1995 and as such will not require Ministerial approval. In addition, the Welsh Government / Defra consultation on the transposition of the MCPD and specified generators included the intention for cost recovery.

We intend to recover the costs of permitting any plant within scope through an initial fee to cover the cost of permitting and an annual subsistence charge to cover the costs of compliance checking. We will regularly review our fees and charges as well as our processes to ensure costs are kept to a minimum.

### New proposal for 2019/20

We are proposing new permit types based on complexity to help simplify the scheme and ensure charges are proportionate to regulatory requirement. We have developed 8 low risk standard rules for which an environmental permit can be applied for, if the activity meets specific criteria. These reduce the need for longer determination times which is reflected in a lower application fee. Standard rules as conditions in an environmental permit (standard permit) cover a wide range of scenarios including low risk MCPs, backup, standby and specified generators (SG). For example, SR2018 No.7 allows up to 15 medium combustion plant on a site. The new standard permits were consulted on separately during Summer 2018 and finalised in October 2018

Where operators are unable to meet the standard rule criteria they will need to apply for either a simple bespoke, or complex bespoke permit which attracts a higher fee due to the technical assessment required.

We are introducing options to vary, transfer and surrender a permit.

We are proposing to include an allowance for basic pre-application advice which will be included in the application charges. Our proposals last year did not include this however we recognise that providing good pre-application advice is important to help operators understand the requirements and improve the quality of applications. Basic pre-application will be limited to 2 hours. Additional advice will be available through our discretionary advice service upon request and charged for at our standard hourly rate.

We are intending to charge an annual subsistence fee to cover compliance which includes checking monitoring returns, inspections, compliance reporting and answering queries. For the standard permits this is a fixed fee and proportionate to the number of MCPs on a site. The subsistence fee for bespoke permits is also fixed but will be banded according to the number of MCPs or SGs on a site as shown in table 2 below.

The tables below show the permit types along with associated application and subsistence fees.

Table 1. Bespoke application charge.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Bespoke Permit type**  | **Application** | **Minor variation** | **Normal variation** | **Substantial Variation** | **Full****Transfer** | **Part transfer** | **Full Surrender** | **Part surrender** |
| **Complex bespoke MCP/ SG** | £8894 | £1280 | £3642 | £5445 | £1520 | £2351 | £1086 | £1527 |
| **Simple bespoke MCP/SG** | £2991 | £1280 | £1660 | £2328 | £1520 | £2351 | £1086 | £1527 |

Table 2. Bespoke Subsistence fees.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Bespoke Permit type**  | **1 MCP/SG** | **3 MCP/SG** | **5 MCP/SG** | **8 MCP/SG** | **10 MCP/SG** | **15 MCP/SG** | **15+ MCP/SG** |
| **Complex bespoke MCP/ SG** | £864 | £932 | £1,000 | £1,068 | £1,170 | £1,340 | £1,408 |
| **Simple bespoke MCP/SG** | £738 |  £806 | £874 | £942 | £1,044 | £1,214 | £1,282 |

Table 3. Standard rules permit charges and subsistence fees.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Standard rules** | **Application** | **Variation (Schedule change) \*** | **Transfer** | **Surrender** | **Annual Subsistence** |
| **MCP standard rules (1 MCP)****SR2018 No.7** | £465 | £278 | £202 | £187 | £245 |
| **MCP standard rules (up to 3 MCPs)****SR2018 No.7** | £526 | £278 | £202 | £187 | £318 |
| **MCP standard rules (up to 5 MCPs)****SR2018 No.7** | £617 | £278 | £202 | £187 | £392 |
| **MCP standard rules (up to 8 MCPs)****SR2018 No.7** | £739 | £278 | £202 | £187 | £471 |
| **MCP standard rules (up to 10 MCPs)****SR2018 No.7** | £800 | £278 | £202 | £187 | £556 |
| **MCP standard rules (up to 15 MCPs)****SR2018 No.7** | £861 | £278 | £202 | £187 | £653 |
| **Specified Generator standard rules****SR2018 No.1 to No.6** | £260 | NA | £202 | £187 | £290 |
| **Specified Generator mobile plant standard rules****SR2018 No.8** | £260 | NA | £202 | NA | £392 |

\* - some environmental permits which use standard rules conditions applicable to multiple MCPs may be varied to include MCPs up to the number of MCPs to which the standard rules conditions apply. This is NOT a variation or revision to standard rules conditions, which can only be undertaken as set out in Chapter 4 of The Environmental Permitting (England & Wales) Regulations 2016.

**Question 5.** **What are your views on the new proposals for Medium Combustion Plant Directive?**

# Other matters to note

We would like to highlight other policy changes which could have an impact on fees and charges. These have either been consulted upon separately in the past year or relate to aspects of our charges that may be of specific interest to charge payers. We are not consulting on these matters as they are policy changes.

## Environmental Permitting Regulations variations

Our permitting scheme has several permit variation types including administrative, minor technical, substantial and conversion from bespoke conditions to standard rules conditions. The type of variation applied for affects the level of technical assessment required which is reflected in the fees. How the variation is initiated may affect whether a fee is applicable. It is important that fees are fully cost recovered in order to be able to provide a high standard of service.

### Administrative variations

Administrative variations are used to make simple changes to permits such as correcting names and addresses and are often provided for free. Administrative variations should not include technical assessment.

Some of our legacy guidance for administrative variation does however list changes which require technical assessment for example changes to waste types or permitted areas.

We intend to update our guidance to ensure variation types accurately reflect the level of technical assessment required.

### Regulator-initiated variations

NRW provides regulator-initiated changes to permits free of charge. This is normally only when we decide to make a specified water activity, the changes are purely administrative in nature or we need to correct or amend a permitting error.

Some permit variations, such as those initiated through the Asset Management Planning process are being classed as regulator-initiated and not charged for. In some years this can lead to a large number of permit variation applications being processed by our permitting centre.

We intend to review how variations are charged for because under-recovery is adversely affecting our ability to resource permitting teams to determine permits in a timely manner.

We are not changing the current variation fee within this review of charges. Normal variations are currently charged at £885.

## Pre-application advice

NRW provides pre-application advice to help customers understand their legal requirements, improve the quality of applications and help identify issues at an early stage. We encourage applicants to read our guidance and talk to us before applying, as this helps improve compliance through understanding as well as determination efficiency.

There is some inconsistency in the provision of advice across regimes regulated by NRW. In some regimes advice is included in the application fee while in other sectors this advice is funded by grant in aid, for example where we do not charge for a licence. We intend to simplify the provision of pre-application advice and make it more consistent and sustainable across all regimes.

Basic advice is intended to help customers complete application forms, clarify guidance, sign post best practice and industry standards and understand how to identify environmental sensitivities in the area. NRW has a responsibility to help those we regulate understand what they need to do to comply with the law.

Where the level of detail and site-specific nature require technical input beyond the scope of basic advice NRW can provide bespoke advice through our discretionary advice service which is charged at our hourly rate of £125 per hour. This may include activities such as developing mitigations, designing systems or modelling impacts. This advice is non-statutory and could be provided by another party.

NRW has a duty when considering applications, to ensure activities will not have wider impacts, such as on European protected sites. To ensure a high standard of protection for these sites, activities will need to be regulated in accordance with Conservation of Habitats and Species Regulations 2017. NRW will carry out a screening based on information provided by applicants to determine if the proposed project is likely to have a significant impact on a European site based on the activity, proximity of the activity to the European site and the sensitivity of the features of the site.

If screening determines that the activity is likely to have a significant effect, NRW need to carry out an appropriate assessment, which is a more detailed consideration of the activity and it’s potential to affect the protected features. If it is not possible to conclude that no adverse impacts will occur, then the applicant will have to consider mitigation measures. If adequate mitigation measures or less damaging solutions are not feasible the activity may only be consented if there are reasons of overriding public interest and compensation measures are provided.

The applicant must provide sufficient information to enable us to determine a permit application and inform relevant assessments. We intend to require applications across all regimes to meet a high standard in order to be accepted or ‘duly made’.

### Environmental Permitting Regulations and Water Resources

Currently NRW guidance suggests up to 15 hours pre-application advice for EPR and water resource permits. The intention of pre-application advice is to help applicants understand their legal obligations and should be quick and simple to provide. The historical limit of 15 hours needs to be reviewed as this is considered to be excessive for the provision of basic advice. The cost of staff time required to provide this level of service is not fully recovered through application charges and therefore in some cases results in under-recovery.

We intend to limit the amount of time available for provision of free basic pre-application advice to 2 hours. Bespoke advice is available through our discretionary advice service which will be charged at £125 per hour.

### Felling Licences, European Sites and European Protected Species

NRW carry out a significant amount of work on behalf of operators applying for felling licences to identify the likely significant effects of their proposals including providing information to inform assessment under Habitats Regulations 2017. This level of support has been provided for a number of years however is now unsustainable as it is funded by the tax payer through grant in aid.

As the competent authority, it is important that NRW is making determinations based on high quality, accurate information. Applicants should provide sufficient information along with applications to enable screening and, where necessary, appropriate assessments to be completed as part of the permit or licence determination. In doing so applicants will be able to clearly show the procedures, design aspects, working methods and mitigations that are in place to minimise potential impacts.

We will continue to provide free basic pre-application advice however this will be limited to 2 hours. Bespoke advice is available through our discretionary advice service which will be charged at £125 per hour.

## Groundwater pollution remediation advice

NRW routinely respond to pollution incidents which impact on groundwater such as heating oil tank leaks. These incidents can often take a long time to remediate and involve specialist contractors to investigate and clean up land contamination.

Groundwater pollution incidents lead to the following actions;

* Investigation by contractors – normally appointed by insurance companies on behalf of the polluter;
* Contractors design and carry out a remediation scheme;
* Contractors request validation of final remediation report from NRW.

NRW maintain a high level of engagement to fulfil statutory duties ensuring incidents are investigated, remediated and appropriate enforcement action is taken. NRW do not have a statutory role to supervise, monitor or advise on the remediation and do not recover costs for advice given which helps contractors remediate sites to an acceptable level. A high frequency or large number of incidents can require significant staff resources which is funded by the taxpayer. For example, an underground fuel tank leak in 2015 is ongoing and has taken more than 100 hours of NRW staff time.

Where our advice is sought for groundwater pollution incident remediation, we intend to introduce a discretionary charge. This will be provided at our standard hourly rate of £125 per hour.

## Enforcement and Investigation Cost Recovery

NRW investigate environmental crime and in cases where the appropriate sanction is prosecution officers produce a casefile of evidence for court. The production of the casefile is funded by the taxpayer through grant in aid and recovered from the defendant following conviction if the court agrees to award fees. The cost base used by staff to calculate the hourly rates has not been updated since the formation of NRW and is under-recovering. We intend to apply our standard hourly rate of £125 per hour when calculating our enforcement and investigation costs.

## Climate Change Legislation

**EU Emissions Trading Scheme**

The current remit of NRW within the Emissions Trading Scheme may change depending on the outcome of the EU Exit negotiations. At this point in time, a number of alternatives are being considered by the UK Government including continuing within the EU scheme. If our continued involvement in the EU scheme is not agreed as part of the EU Withdrawal agreement, then an alternative approach will be developed by UK Government. NRW’s role may change as a result and if this is the case, we will review the outcome and inform you of any impact on charges going forward.

**Carbon Reduction Commitment**

In July 2018, the UK Government formally announced that the Carbon Reduction Commitment (CRC) Scheme will be closing at the end of March 2019 and that the SECR (Streamlined Energy and Carbon Reporting) scheme will replace it.

As SECR reporting will be done through Companies House, it will fall outside the remit of Devolved Administrations and there may not be a role for NRW going forward. There may be ongoing administration and enforcement work beyond the CRC closure date of 31st March 2019 if the legislation allows, and if so, the CRC Registry will need to be maintained for a period. Therefore we may need to continue to charge you for CRC work in the short-term. We will keep you informed.

## Strategic Review of Charges

During our annual charging reviews, we have highlighted the need for cost recovery and a reduced dependency on taxpayers to fund regulation in Wales. We have introduced or amended charges and streamlined services to improve schemes where possible.

Over the next few years we intend to carry out a comprehensive strategic review of our charges to ensure full cost recovery and help deliver Sustainable Management of Natural Resources. The strategic review of charges will ensure regulation in Wales is sustainable, incentivises behaviour change and delivers long term outcomes.

The intention is to create a new charging scheme which is simple to understand, consistent, transparent and proportionate. We will continue to embed our regulatory principles and continuous improvement to streamline delivery. Central to this review will be the principle that the cost of regulation is met by those we regulate and is therefore less reliant on the Welsh taxpayer as stipulated by Managing Welsh Public Money. The review is an opportunity to explore innovative and collaborative ways of working and develop a transparent evidence base for our wide remit of regulatory activity.

We intend to keep the annual review of charges to a minimum while we work to deliver the strategic review of charges. We will however be seeking stakeholder engagement throughout development to help ensure the new scheme is fair to business and the public of Wales.

# Responding to this Consultation

We are seeking your views and opinions on our proposed fees and charges for 2019/20.

## How to Respond

The closing date for replies is **14 January 2019**.

You can reply in the following ways:

**Email**feesandchargesconsultation@naturalresourceswales.gov.uk

**Post**

Future Regulation Team – Fees and Charges Consultation

Natural Resources Wales
Maes y Ffynnon
Penrhosgarnedd
Bangor

Gwynedd
LL57 2DW

**Telephone**0300 065 3000

**Online**Available on our website at [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

## Data Protection

**How the views and information you give us will be used**

Any response you send us will be seen in full by Natural Resources Wales staff dealing with the consultation. It may also be seen by other Natural Resources Wales staff to help plan future consultations.

We intend to publish a summary of the responses to this document. We may publish responses in full. Normally the name and part of the address of the person making the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name and address to be published let us know when making your response and we will remove them from published material.

Names and addresses we remove might still be published later, although we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including Natural Resources Wales. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks us to seek information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published that is an important factor that we would take into account. However, there might sometimes be an important reason why we would have to reveal someone’s name and address, even though they have asked them not to be published. We would get in touch with the person and ask their views before we finally decide to reveal the information.

## Next Steps

Following the consultation, we will make all comments (excluding personal information as detailed above) and our responses publicly available on our website. If you respond with an email address, we will acknowledge your response and will notify you when the summary of responses has been published on our website.

# Annex 1 Charge Payers Consultative Group

|  |
| --- |
| **Membership List** |
| Federation of Small Businesses |
| Dwr Cymru/Welsh Water |
| Welsh Environmental Services Association |
| Country Land and Business Association |
| British Hydropower Association |
| Micro Hydro Association |
| National Farmers Union |
| Energy UK |
| Farmers Union Wales |
| UK Petrochemical Industries Association |
| Chemical Industries Association  |
| CONFOR (Confederation of Forest Industries) |
| Chartered Foresters |
| Confederation of British Industries |
| Resource Association |

1. <https://naturalresources.wales/about-us/strategies-and-plans/corporate-plan/?lang=en> [↑](#footnote-ref-1)
2. <http://gov.wales/funding/managing-welsh-public-money> [↑](#footnote-ref-2)
3. <https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/our-charges/?lang=en> [↑](#footnote-ref-3)
4. <https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/regulatory-principles/?lang=en> [↑](#footnote-ref-4)
5. <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf> [↑](#footnote-ref-5)