



The Authoritative Voice of
Contaminated Land Management
from a Land Holders' Perspective

National Quality Mark Scheme: Landholders' Perspectives on Achieving a Successful Outcome

Frank Evans, Chairman SAGTA



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Why is SAGTA interested?

- Environment Agency Position Statement
- Change to consultation process with EA
 - NQMS reports
 - Accepted as EA position in Permitting and Planning consultations
 - Less EA agreement in relation to closure positions on projects
- Voluntary schemes of less interest

Drivers for Change

Driver for change		
Service providers	x	<i>No common voice</i>
Clients – informed	x	<i>Already procure quality</i>
Clients – not informed	x	<i>Don't understand issues</i>
Regulators	✓	



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SAGTA views?

- Good quality and timely EA engagement and closure agreement is valuable and preferred
- Regulator delay and EA inexperience is costly
- Welcome an objective to raised standards and consistent regular engagement
- Informed Clients do not need a voluntary NQMS.
- Detail of Position Statements is important
- Wider understanding of issue and Local Authority reactions a concern

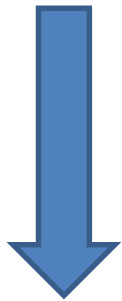
Regulatory Engagement

	Client	Advisor	Regulator
<i>Best</i>	Informed	Good quality advice	Experienced & resourced
	Informed	Good quality advice	Inexperienced & under-resourced
	Less informed	Poor advice	Experienced & resourced
<i>Worst</i>	Less informed	Poor advice	Inexperienced & under-resourced

EA Position Statements

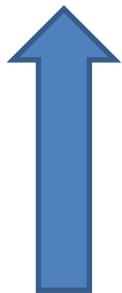
- Better Regulation
- Clarity on what will be subject to NQMS and what will not be
- Predictable and consistent application
- Followed by EA officers
- Strong audit process to maintain standards
- Increase consultant fees offset by better EA engagement
- Regulatory Burden
- Increase consultant fees and no process improvement
- Uncertainty when the NQMS will be accepted
- Inconsistent application by EA officers
- Weak audit process, decline in standards
- Both EA review and NQMS!

Role of SILC and CL:AIRE



- **Regulator – Compliance with law**

- **NQMS process**

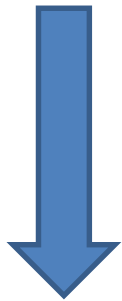


- **Industry – Growth/Opportunity**

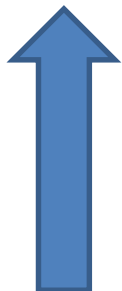


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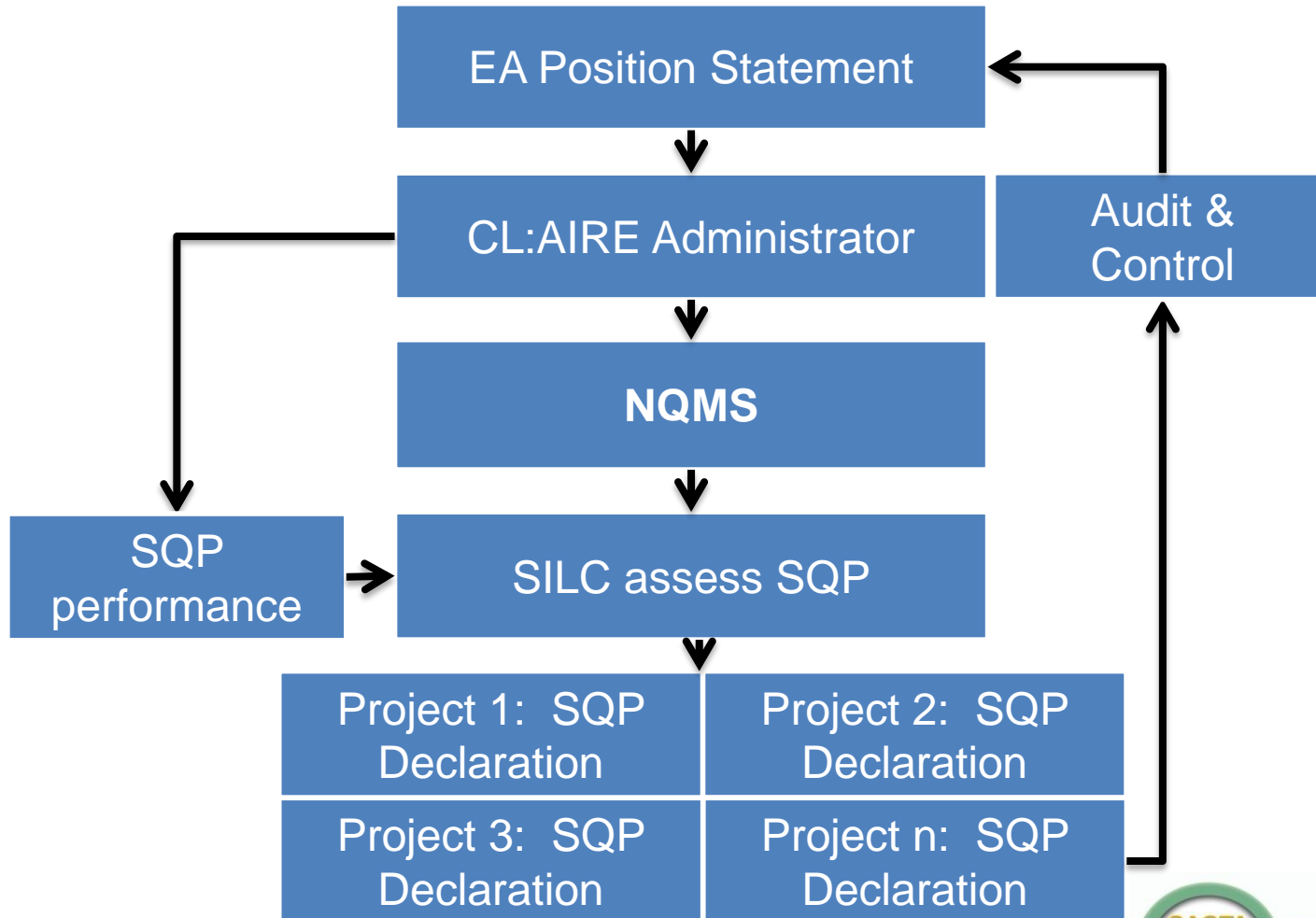
Role of SILC and CL:AIRE



- Regulator – Compliance with law
- Drive for better regulation
- Support for industry initiative
- Need for an administrator
- CL:AIRE as administrator
- NQMS process
- SPQ role delivering quality reports
- SILC assessing competent people
- Requirement for competent people
- Development of an initiative by Land Forum
- Industry – Growth/Opportunity



How it can work



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Risks & Opportunities

RISKS

- Implications and reasons for change not fully understood
- Local Planning Authority uncertainty exists
- Scheme does not get traction
- **Audit process?**

OPPORTUNITIES

- May also improve quality of reports submitted to LPAs
- Support Definition of Waste Code of Practice: Transfer of Brownfield Soils



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Summary & Conclusions

- EA resourcing issues foreseeable
- EA support for NQMS to counter problem
- Skill framework and an organisation (SILC) to support SQP assessment in place
- Definition of Waste CoP shows it can work
- Should raise standards across the sector
- **Is audit process robust enough?**
- Concerns that implications not well understood
- Concerns about confusion with LPA role