

**DR. CAROLINE LUCAS**

**Green Party Member of the European Parliament  
for the South East of England**

Elliot Morley MP  
Minister for Environment and Agri-Environment  
Nobel House  
17 Smith Square  
London SW1P 3JR

11 April 2005

Dear Mr. Morley,

**Re: Single market differences in pollution control**

I am writing to you with regard to an unacceptable case of poor UK performance on pollution control relative to that of other European countries.

There is much evidence to suggest that styrene poses considerable health risks, including being a suspected carcinogen. In recognition of this, countries such as France, Poland, the Scandinavian countries and the Netherlands have stringent legislation on styrene emissions from industrial processes such as fibre reinforced plastics manufacture and boat building. In the Netherlands, for example, an emission limit value of 100ug/m<sup>3</sup> is imposed when the mass flow (before the use of abatement techniques) is above 2000 g/hour; and for companies establishing since April 2003, the emission limit value is 50ug/m<sup>3</sup> when the mass flow is above 500g/hour (after the use of abatement techniques).

The nature of such legislation is in line with the World Health Organisation recommendation that a limit be imposed (with the WHO's suggested value actually being 70ug/m<sup>3</sup>). The limits are also eminently achievable, noting that a wide variety of established techniques for reducing emissions, as well as substitutes for the use of styrene, are available.

However UK legislation stands in contrast to this model of good practice, as it involves no limit value; and moreover there is no indication of any intention to introduce one. In particular, I would draw to your attention Section 5.5 of Draft Process Guidance Note 4/2(04), subject of the recent DEFRA consultation on *Guidance for Polymerisation or Co-Polymerisation of Pre-formulated Resins or Gel Coats Containing Unsaturated Hydrocarbons*. This states: "The aim should be there should be no offensive odour beyond the process boundary, as perceived by the regulator."

I do not see how proper regulation of the UK fibre reinforced plastics industry can be adequately ensured by such a subjective provision. Without a concrete limit value, local authorities are likely to face real difficulties in implementing Regulation 11(2) of the Pollution Prevention and Control Act 2000.

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The lower abatement costs afforded by such *laissez-faire* legislation may well allow UK industry to benefit from a stronger trading position relative to its more stringently-regulated European competitors. However, I am sure you will recognise that on economic as well as environmental and quality of life criteria, it is imperative that public health and safety are afforded greater priority than apparent short-term gains of this nature. Quite apart from its duty to protect its own citizens, the UK government ought to be embarrassed about the country becoming known as a "dirty man of Europe".

I would therefore like to know why the proposed legislation is currently so far below best practice, and what plans are in place to correct this situation by putting in place a quantitative limit for styrene emissions.

I look forward to your response.

Yours sincerely,

Dr. Caroline Lucas MEP  
Green Party MEP for South East England