



**Sea and Water**

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Mr Martin Griffiths  
Environment Agency  
Water Framework Directive (RBM Strategy)  
Innovations Centre  
Howbery Park  
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Oxon OX10 8BD

26 April 2005

Dear Mr Griffiths

**Strategy for River Basin Planning – a consultation**

Thank you for consulting Sea and Water on your strategy for river basin planning.

Sea and Water is a government and industry sponsored organisation representing the interests of the UK water-freight industry. Our remit includes encouraging the shift of freight from road to shortsea, coastal and inland shipping to reduce congestion on the road network and to lessen the environmental impact of freight transport.

Our central concern is that, in general, the mechanisms proposed do not appear to take sufficient notice of the commercial uses for water. Although our industry conducts its business largely unnoticed, shipping is responsible for handling around 96% of the UK's imports and exports. The vital importance of shipping to the UK economy should, in our view, suggest that you take particular notice of this industry in your consultations.

Your national stakeholder group serves a useful purpose but participation is skewed towards environmental and leisure interests; and it is probably too large to be effective. We would suggest that individual sector groups are

convened which would then feed into a smaller but more focussed stakeholder group.

Contributing at a district level will not be easy for the maritime industry (which, in general, has little in the way of regional representation although there are a number of regional water-freight cluster groups you might wish to consult) and the Agency will need to ensure it includes all aspects of the water-freight industry in order to get balanced opinion. The Agency should also note that some maritime interests (and indeed individual companies) will operate in more than one district whilst others - the Thames and Medway ports, for example - will find themselves at the boundary of three districts due to the way your boundaries have been constructed. Care will be needed to ensure the relevant voices are heard without placing an undue burden on your consultees who might be expected to contribute to two or more districts.

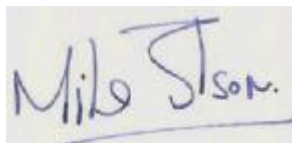
The shipping industry is highly competitive and you will need to ensure that eventual "programmes of measures" are applied evenly across each district to avoid upsetting the existing commercial balance.

It will also be important to understand the future potential of each individual water body such as an inland waterway. On initial assessment it will be quite possible that a particular waterway is not supporting commercial navigation but - as circumstances change - a commercial use might arise. The Agency must ensure that potential uses of water bodies are taken into account to prevent a restriction being placed on future freight movements.

Whilst we understand that social and economic factors will be taken into account when deciding if a water body can achieve "good" ecological status, it will be important to take a wide range of views in order to define these factors. We are keen to see the Agency take a "joined up" approach and include other relevant government departments. For example, DfT's policy is to promote the use of sustainable transport for freight and that means largely water transport.

In summary, we feel that the Agency has underestimated the importance and requirements of the UK water-freight industry would ask that specific mechanisms are established to take full notice of this important sector at the earliest opportunity.

Yours sincerely

A handwritten signature in blue ink that reads "Mike Elsom". The signature is written in a cursive style and is positioned above a horizontal line.

Mike Elsom  
Director