

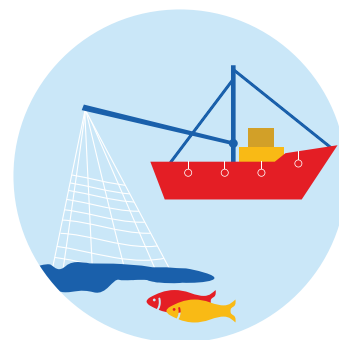
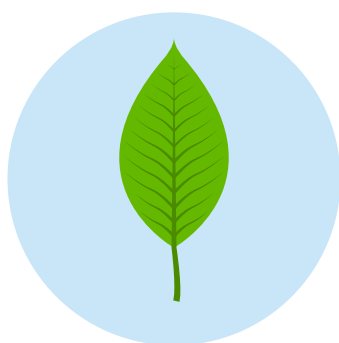
Sustainable Development Resolution

British Ports Association

“The British Ports Association is committed to grasping the once in a generation opportunity that Brexit will provide to promote a sustainable development framework in the UK that preserves our incredible natural environment and habitats whilst giving ports greater certainty and the ability to grow sustainably.

Careful management of our seas and waters is key to a sustainable future and ports will continue to play a part in delivering it. As guardians of our maritime gateways, ports and harbours will continue to provide safe, secure and sustainable operations, independent of Government and at no cost to the Exchequer.”

Alec Don, Chairman of British Ports Association



Supporting a strong healthy environment

We will do this by:

- Encouraging our members to continue acting as responsible custodians of the marine environment by building and maintaining infrastructure within the principles of sustainable development
- Through industry groups, working with conservation bodies to promote sustainable development
- Supporting our members as they continue helping to reduce marine pollution and litter and promoting cleaner oceans by providing suitable waste reception facilities for vessels
- Where appropriate supporting the principles of 'modal shift' within the UK and encouraging more coastal shipping, helping to reduce road congestion and overall freight carbon dioxide emissions
- Supporting our major port members in the development of new air quality plans to reduce emissions within their Harbour Areas and sharing good practice amongst industry
- Through our membership of the European Sea Ports Organisation, continuing to promote and support the EcoPorts initiative in the UK
- Supporting our members operating in designated marine conservation and protection area by promoting sustainable development and working with ports on good practice
- Facilitating environmental good practice in areas from ballast water management to oil spill prevention by bringing together port managers and environment officers to share experiences, innovative ideas and good practice on a regular basis
- Working constructively with the UK, Scottish, Welsh, and Northern Irish Governments, as well as conservation bodies and regulators – pointing out issues where they arise and helping to disseminate advice and policy changes to industry
- Supporting regulators to positively drive innovative ideas on improved licensing and consenting arrangements
- Supporting the UK Government when promoting sustainability and coordinated action at a global level through the IMO and other forums
- Supporting sustainable fisheries that are economically and biologically viable for the next generation of our coastal communities
- Continuing to support the Seafish Industry Authority in the development of the Responsible Fishing Ports Scheme that is suitable for all ports and ensures unbroken transparency and accountability in the seafood supply chain

- Prioritising navigational safety across the industry and thereby continuing to support the industry's excellent record in preventing and preparing for marine incidences and accidents that might lead to environmental impacts; and working with industry partners *Port Skills & Safety* in improving terrestrial safety as well
- Periodically reviewing industry's environmental record and improving this resolution

Supporting a strong healthy economy

Ports provide

- Facilitating the overwhelming majority of the UK's international trade in an efficient manner, helping to keep national and regional economies moving and the costs of goods down
- Forming central gateways, for both trade and non-cargo activities, for the UK's coastal regions and playing a significant role in national and local industrial and transport strategies
- Providing high quality employment, employing over 101,000 people in the UK, in highly productive, well-paid jobs
- Planning, financing and building billions of pounds of private infrastructure in a sustainable manner to keep our economy growing

UK Ports' Economic Contribution

- UK ports and terminals have an estimated £1.7bn of major port infrastructure investment in the development pipeline

The ports industry direct contributions to the UK economy totalled:

- £22.6 billion in business turnover each year
- Annually £7.6 billion in GVA
- 101,000 jobs

The ports industry also aggregate / indirectly supports:

- £23.8 billion of GVA – (For every £1 in GVA directly contributed by ports a further £2.15 in GVA is generated across the UK economy)
- £53.7 billion in turnover
- 695,200 jobs in the wider maritime sector
- £8.4 billion through the compensation

Working in Partnership: Government, Industry and Conservationists

Win/Win: The British Ports Association supports the Government's commitment to ensuring that the UK's environmental protections will be at least as strong outside of the EU as they are now. We are putting forward a number of ideas for improving the UK's sustainable development framework to give industry more certainty whilst strengthening and improving our understanding of the marine environment and building confidence in the systems in place to improve it.

The BPA represents 100 port members which between them manage and operate over 350 ports, harbours, terminals and marine facilities around the UK. The marine and coastal environment is something the ports industry is immensely proud of and wishes to celebrate. Increasing emphasis on environmental awareness is something we support but in the last generation the steady increase in rules and initiatives has had some unintended consequences for the ports sector.

We have set out some areas where Government can support industry and the environment through mutually beneficial sustainable development framework. Brexit and the Government's 25 Year Plan for the Environment offer an unparalleled opportunity to modernise and improve current regulatory environment, which has become increasingly complex. Industry is often asked what can be done to improve the development framework and we have collated sustainable industry proposals alongside our own Charter.



Leadership and the Government's Environmental Principles

The British Ports Association, through the Seabed Users Development Group has signed a joint statement with representatives of major environmental groups to strengthen the way we work together. This will ensure that business is able to continue to support a healthy economy whilst conserving and improving our environment for future generations.

We support many of the EU's environmental principles and accept that to avoid complications these frameworks should be carried over into UK law, with the exception of the outdated and damaging "precautionary principle". The UK's Environment Bill is an opportunity to update this, reflecting the progress made in the UK towards a more risk-based approach over the past decade.

We would like to see more Government investment in research and evidence to increase confidence in our environmental protections and principles. This would also support the wider maritime economy.

Our environmental regulators and conservation advice bodies should also be properly resourced so that they can be as responsive as possible: both to industry and to emerging environmental challenges. Confidence in conservation advice bodies and regulators is both good for the environment and good for developers.

Government should make it easier for industry and others to support evidence gathering by developing a platform that allows reliable data on our dynamic maritime environment to be captured and monitored more effectively, increasing confidence in our environmental protections.

Shipping has a role to play in a sustainable freight strategy and we would support formal recognition that ports and harbours can provide sustainable solutions to industrial, coastal and logistics activities and challenges.



SOME OF THE EU'S CURRENT ENVIRONMENTAL PRINCIPLES

Sustainable Development: Development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs.

Prevention Principle: Preventive action should be taken to avert environmental damage.

Polluter Pays Principle: The costs of pollution control and remediation should be borne by those who cause pollution rather than the community at large.

Rectification at Source Principle: Environmental damage should as a priority be rectified by targeting its original cause and taking preventive action at source.

Integration Principle: Environmental protection requirements must be integrated into the definition and implementation of policies and activities.

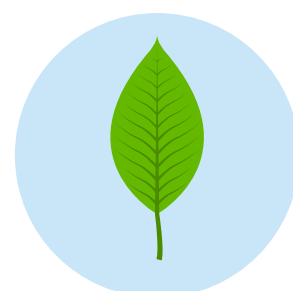
Air Quality

Overview: Whilst shipping accounts for a relatively small proportion of overall Nitrogen Oxide emissions, ports are committed to playing a part in efforts to improve the UK's air quality. Every port in the UK is unique in the types and volumes of cargo and their surrounding environment, so we support the Government's approach of requiring industry to produce bespoke plans based on their individual circumstances as well as emission control areas in UK waters.

Air Quality Plans: Many British Ports have installed shoreside power for smaller vessels such as fishing boats and leisure craft. But for the majority of ports, particularly those handling large vessels such as cruise ships and large cargo vessels, the cost of installing shoreside power is currently prohibitively high. All major ports in England (and many others in the rest of the UK) will have produced air quality plans that include assessments on shoreside power by May 2019.

Building a Better Evidence Base: We would support more independent research from Government on the source and level of pollutants. The British Ports Association has worked closely with Government as it develops its Clean Air Strategy, which we support. We believe that environmental policy must be built upon a strong, up-to-date and credible research foundation. We would support more Government investment in research into cleaner and alternative fuels.

Leadership and Coalition Building: Emissions in one country can degrade air quality in other countries and we believe that improving shipping emissions should be a collaborative, global exercise. We support the emission control areas in UK waters.



SHORESIDE POWER / COLD IRONING

What is cold ironing?

Cold ironing is when a vessel turns off its engines and plugs into a shore-based power source. The name refers to the practice of allowing the engines to cool.

Why is it not standard practice?

The costs of installing shoreside power vary significantly from area to area. In some places, there may not be enough capacity to handle the significant pressure that some vessels, such as cruise ships, would place on grid. The cost of upgrading the power network outside of a port can run into billions of pounds and must be borne by the harbour authority.

The other barrier is the lack of significant and consistent demand from vessels. Some ports have estimated that it would take 150 years to recoup investment in shoreside power.

What are ports doing?

Some ports have installed shoreside power, typically where the users are smaller vessels that call regularly. In other places, ports are factoring in the possible future installation of shore power by building in ducting and ensuring that there is adequate space for future installation.

What can Government do?

To improve take-up of shoreside power, the industry needs certainty to be able to invest. As shipping is a global industry, Government can help support by this by pushing for clear global rules and standards at the IMO. The Government could also invest, either directly or through a challenge fund, in grid capacity where it is needed or in research to bring the cost of technology down.

An alternative, under the “polluter pays” principle might be Government intervention directly on vessels visiting UK ports which would provide a clear policy signal and, potentially, funding which would increase demand, improving the business case for private investment.

What are the alternatives?

Cleaner Fuels: Many UK ports are also working towards ensuring that Liquefied Natural Gas (LNG) is available for ships by 2025. LNG is a cleaner alternative to traditional marine fuel.

Greenhouse Gases

Moving freight by water is the most energy efficient mode of transport. Ports will continue to play an important role in providing bunkering and waste reception facilities.

We support the IMO's ambitious strategy to half vessel emissions by 2050 (from their 2008 level). To be effective, action on shipping is best taken at the international level.

Global leadership: We have called for the implementation of the strategy to be fully global, practical and not distort competition. We are committed to work with the Government to ensure there are realistic and achievable aims.

Part of the solution: 90% of the UK population lives within 30 miles of the coast, and no part of the UK is more than 70 miles from it. 95% of the UK's trade is carried by sea, but coastal shipping (moving freight within the UK by sea) has a major role to play in helping the UK reduce its greenhouse gas emissions.

PART OF THE SOLUTION, NOT PART OF THE PROBLEM THE BENEFITS OF COASTAL SHIPPING			
	Vessel carries (estimate)	A truck carries (estimate)	Each vessel takes this many trucks off UK roads...
Timber	5,000 cubic metres	40 cubic metres	125
Fuel	4,000 tonnes	18 tonnes	220
Aggregates	4,000 tonnes	18 tonnes	220



Marine Development

Most harbour authorities have statutory responsibility to conserve a safe, navigable channel. This usually involves dredging to maintain the stated depth and is funded through harbour dues. Many ports have been centres of industry and economic activity for hundreds of years. As gateways for 95% of the UK's trade, the role ports play must not be taken for granted: the industry requires affordable, efficient, responsive marine licensing and consenting system in order to be able to operate efficiently.

Marine Plans

The British Ports Association supports marine planning and has been involved in the development of national and regional marine plans across the whole of the UK. We believe that marine plans must form the foundation of the marine planning system and be capable of effective prioritisation. We have welcomed and support the principle of designating ports' marine areas as Strategic Resource Areas, recognising that the port activity underpins the marine economy.

Once the marine plans are established, we would like to see a process of evaluation and review to ensure that they have the necessary status and authority to properly underpin sustainable marine development.

Marine Designations

The British Ports Association supports the principle of protecting and improving our marine environment. Our oceans and coastlines are beautiful and something to celebrate: thousands of miles of cliffs, coves and beaches and over 450 harbour authorities overseeing the use of our seas for trade, travel and entertainment.

The BPA has a longstanding position that marine designations should not be placed inside statutory harbour areas or in port approaches or areas used for maritime activities such as anchorages. This is because they can have a serious impact on a port's ability to carry out its statutory duties around safety, as well as raising the cost and time for both maintenance and development. Harbour Areas make up a tiny proportion of the UK's marine area and have existed for hundreds of years.

Once the UK leaves the EU, it would be wise to simplify the various different types of marine designation. European Marine Sites currently do not allow for socio-economic

considerations to be taken into account when designating sites. Making these sites more flexible would be a sensible and welcome move, post-Brexit. We are ready to work with conservation bodies and Government to ensure this is done in a way that does not water-down protections but works for both the environment and industry.

Licensing & Consenting

An efficient and affordable marine licensing process is essential to supporting sustainable development. The process is devolved in the UK and different administrations have taken different approaches to this, and we will continue to work with each of them constructively in an effort to improve the process.

We support the risk-based approach, which has worked well, with low-risk activities being granted exemptions or put through a fast-track process.

A one-stop shop: We would welcome a review and renewal of the coastal concordat, which is a laudable initiative, but has not been as successful as we might have expected or hoped. We support any effort to provide a single-window with a single point of contact throughout the licensing process, as is currently proposed in Wales.

Giving regulators the tools to do the job: The industry understands the government's push towards cost-recovery but hopes that licensing and advice bodies will be adequately funded so that they are able to carry out their functions properly. We would also hope that, as fees increase, so does the professionalism and performance, measured through ambitious KPIs.

Credible evidence: In order to build a first-class environmental regime, we need first class evidence. Collecting data on marine habitats and species not only informs conservation policies, but can help support economic growth. Government has explored the possibility of mapping the UK seabed and we would welcome this exercise.



Responsible Fishing

The British Ports Association We represent the overwhelming majority of fishing ports in the UK, including all of the top 20 by landings. The industry supports a sustainability and is keen to preserve fish stocks for the next generation.

The British Ports Association has led the development of the Responsible Fishing Ports Scheme (RFPS), which was introduced in 2018. The RFPS is a voluntary, independently audited, certified programme designed to demonstrate responsible food safety and good operational practices within UK fishing ports and harbours. The scheme has been developed by the UK seafood industry to raise standards across the fishing ports sector.

We would also like to see the fishing industry put on a sustainable economic and social footing by strengthening the economic link between those with licenses to exploit fish in UK waters and the coastal communities that support them. We are committed to working with the UK Government and devolved administrations to build a sustainable fisheries policy. As part of this we are keen to improve

Ballast Water

The Ballast Water Management Convention came into force internationally on 8th September 2017. The UK is in the process of drafting legislation that will allow accession to the Convention to take place.

Whilst this is primarily an issue for the shipping industry, we have been in regular contact with the UK Government regarding our input at the IMO on the implementation of this convention and are supportive of the approach being taken. There is no requirement for States or ports to provide such facilities. The UK has an independent and competitive ports sector that is responsive to private demand for such facilities.

Some port authorities have taken unilateral action on ballast water exchange and as an Association we are keen to support ports taking voluntary action in response to their unique environments.

Counter pollution

Every Harbour Authority has an Oil Spill Response Plan for responding to actual or threatened oil pollution incidents. These plans are dictated by the category of port operation. Whilst these incidents are rare, harbour authorities play a crucial role in responding should the worst occur. We are keen to work with Government to explore how this process can be improved to provide both the industry and the regulator with efficiencies and confidence in the arrangements.

Landside Reform & Terrestrial Planning

As well as marine development, ports often need to amend and build land based facilities. Depending upon the size of a port project, **land-side planning** is either subject to national or, more typically, local frameworks. Streamlining planning processes has been an aim of the ports industry and indeed both other developers and policy makers who want to see sustainable growth.

Many ports have **Permitted Development Rights** on the land they own, which enable them to build certain structures and undertake certain land-side projects in accordance with development thresholds set out in regulations dictating Environment Impact Assessments (EIAs) and building structure and development regulations. However port structures and needs are becoming more complex and at many sites environmental designations and conservation rules have ‘trumped’ these powers.

Reinvigorating Permitted Development Rights and increasing project thresholds would ensure that ports can remain flexible in their ability to meet new business opportunities quickly, but within safeguards set by EIA rules. This would also help ease local planning office time and resource.

Port Master Plans are also an important way that local planners and stakeholders can get involved in and with port strategies and connectivity needs. We would like to see more guidance for local authorities on the importance of having regard for such Plans as well as the importance of trade and sustainable economic port development.

Joint Marine and Land Infrastructure Development Consenting

For some port projects land and marine consents are required and might even require a revision of a port authority's own Harbour Order. To streamline some process and avoid certain duplications Defra developed the **Coastal Concordat** process for England which would enable particular public agencies to take the lead on applications. We support this initiative however take up has been limited and some elements remain fragmented.

In Wales, where ports policy was devolved in 2017, the Welsh Government has taken the opportunity to assess how port consenting might be overseen in the future and we have been discussing some options with officials. For certain sized projects an opportunity to **combine marine, land and Harbour Order consents** could be a possibility. Assuming the process is streamlined and the thresholds suitable this is an appealing concept which policy makers outside Wales might consider.

PORT DEVELOPMENT & ENTERPRISE ZONES

Current consenting arrangements can lead to delays and unintended challenges for ports. If in the post Brexit era ports and trade do become more central to economic, industrial and transport strategies, we are encouraging a more visionary proposal to help ports adapt and grow. Our concept is for a new pro-growth and trade initiative where UK ports are designated as 'Port Development and Enterprise Zones'. These areas would support and incentivise growth in trade and new industrial activity by fast-tracking sustainable development projects, creating clusters of businesses that undertake important activities around port locations and provide significant levels of employment in often deprived regions.

Waste

Shipping currently accounts for around 20% of global waste discharged into the sea. For hundreds of years, this was the primary method for vessels disposing of waste. Ports play an important role in protecting the marine environment by offering waste reception facilities for vessels.

The Port Reception Facilities Directive was introduced in 2000 and is designed to reduce the incentive for vessels calling at EU ports to discard waste into our oceans by ensuring that the appropriate facilities are available. A mandatory fee is charged to all vessels to maximise the incentive to discharge whilst in port.

The Port Reception Facilities Directive is currently being revised and expanded. It is unclear how Brexit will affect the implementation of this in the UK – but we would urge Government to ensure that it is workable and integrated into wider waste and infrastructure policy and considerations. Ports are not the end destination for waste and so consideration needs to be given as to what can be discharged and where. We support the thrust of the current policy whilst understanding the need for revision. The British Ports Association has been engaging with the European Sea Ports Organisation and the EU in discussing how the revised Directive might be improved and we are open and ready to work with UK Government in developing a UK policy that is holistic, sustainable and as consistent as possible with EU ports.



**British
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