**EA’s EPR Charges Consultation, Jan 2018. Draft response for angling clubs and other voluntary community groups**

Full details of the proposals and the consultation is here: <https://consult.environment-agency.gov.uk/engagement/environmentagency-charging-proposals-fromapril2018/>

**NB: closing date is 26/1/18**

EA would prefer all responses through their consultation portal (<https://consult.environment-agency.gov.uk/engagement/environmentagency-charging-proposals-fromapril2018/consultation/)> which contains a lot of questions not relevant to river work.

You might try to submit by e-mail ([enquiries@environment-agency.gov.uk)](mailto:enquiries@environment-agency.gov.uk)) though EA are not keen on this route and your mail might get rejected.

Or post to

Environment Agency

Charge Proposals for April 2018

National Customer Contact Centre

PO Box 544

Bow Bridge Close

Bradmarsh Business Park

Templeborough

ROTHERHAM S60 1BY.

Dear Sir/Madam

**EA Charge Proposals from April 2018**

I am responding to the public consultation on Environment Agency Charge Proposals from April 2018 and offer the comments below.

I am the Chairman of **[NAME]** Angling Club, with **XX** members fishing and caring for YY miles of the River **[NAME]** in **[COUNTY NAME]**. The Club values its river and its wildlife and, in addition to our fishing, we work to conserve and improve the habitat of the river, its surrounds and local people. We have had a strong and fruitful relationship with our local EA team, both parties contributing to making the river better.

1.  Until January 2017, applying for Flood Defence Consent to carry out various works on the river, both for good and essential river management and to make improvements, was a simple and inexpensive process costing approximately £50 per application.

2.  From January 2017 and the implementation of the Environmental Permitting Regulations, we had to apply for a Bespoke Permit to carry out any meaningful work. This is an extremely complicated process and the cost of consent escalated to a **minimum** of £170 per application (plus a stated compliance charge of £70). The exemptions under EPR do not allow us to do any environmentally meaningful habitat improvement work and, for a small club such as ours, these costs are significant, equivalent to **ZZ** annual membership fees.

3.  It appears that under the proposals of this consultation, the charges for even very simple habitat improvements (e.g. a number of woody debris flow deflectors), will start at £764, plus a £271 a subsistence charge, if applicable. These figures do not include any pre-application discussion or guidance sought from the Agency, nor any other advisory costs the club might incur in compiling an application. For a relatively simple, low-cost project carried out by club members, using materials on site and providing significant environmental gain, the cost of obtaining consent may well be equal to if not more than the actual cost of the works. This is quite simply unrealistic and likely to mean that we will no longer be able to carry out any rivers works and improvements. This will surely be a very poor outcome of the proposed new regime should it be implemented in April.

I urge you to reconsider these proposals to allow us to continue to contribute to improving our natural environment.

Yours etc.