
Technical Guidance note M9: Environmental monitoring of bioaerosols at regulated facilities

Environment Agency

RPC rating: validated

Description of proposal

The EA has amended a guidance note for bio-waste treatment facilities, which is intended to help such facilities comply with bio-aerosol monitoring and regulation.

Bio-aerosols are a by-product of biodegradable waste, when processed through certain waste management facilities. Bio-aerosols can be harmful if ingested, and the government therefore applies stringent regulation regarding the monitoring of bio-aerosol levels.

The guidance includes methods for measuring bio-aerosol emissions in various circumstances, as it is expected that businesses will utilise these measures to ensure they meet the restrictions on bio-aerosol emissions. The revised guidance includes changes to these methods and to monitoring frequencies.

Impacts of proposal

106 bio-waste treatment facilities are affected by the revised monitoring requirements. These are the bio-waste treatment facilities that have houses, people or businesses within 250 metres of their site boundaries. Research has shown that, beyond this distance, concentrations of bio-aerosols decay to background levels.

The BIT assessment identified two types of costs on business:

Cost of reading guidance

Each operator is expected to spend five hours reading the new guidance in the first year following publication and a further hour each subsequent year. At an average hourly rate of £23.53 (taken from the Annual Survey of Hours and Earnings), this amounts to around £35,000 across all businesses over the ten year appraisal period.

Cost of monitoring

Bio-waste treatment facilities usually pay a third party to monitor their bio-aerosol emissions. The Environment Agency has consulted with companies that provide such services, and has gathered data on the cost increases that have resulted from the increase in regulatory standards. Using this information, the Environment Agency estimates that operators will face a cost of up to around £800,000 in total over the ten year appraisal period as a result of changes to monitoring methods and frequencies.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.1 million. This will be a qualifying regulatory provision that will score under the business impact target.

Quality of submission

Overall, this BIT assessment provides a clear and proportionate analysis of the impact on business.

The BIT assessment states that bioaerosol monitoring service providers were consulted, in order to obtain price estimates for use in the EANDCB calculation. The assessment states that the highest estimate was used for the calculation. The RPC encourages departments/regulators to use the best estimate, rather than the most conservative estimate. Therefore, use of the average price may have been more appropriate. As the difference in cost is relatively small, it is unlikely to have made a material difference to the EANDCB.

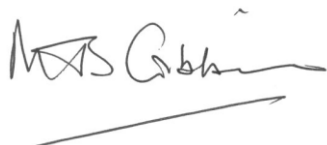
Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0.1 million
Business net present value	£-0.77 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
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EANCB – RPC validated ¹	£0.1 million
Business Impact Target (BIT) Score ¹	£0.5 million
Small and micro business assessment	Not required (fast track low-cost regulation)



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.