

# Response to Consultation

**Date:** 17 June 10

**Consultation:** Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010.

## Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 32,000 good quality, affordable homes for renting or equity sharing. Further information is available at [www.nifha.org](http://www.nifha.org)

## Background

Registered housing associations are at the forefront of sustainable house-building in Northern Ireland and they are committed to designing and building homes to robust environmental standards. As such, the Housing Association movement in Northern Ireland welcomes any initiative which ensures and promotes high standards in the natural environment in Northern Ireland and we include within this any source of water.

## General Comments

The proposed regulations will not have an impact on our general needs tenants as any oil storage containers would normally be below the 3500 litre threshold level. There may however be implications for our members where residential care services are provided, as they may be required to upgrade their storage tanks. This will bring further costs to an already, in many cases, overstretched social enterprise sector.

NIFHA has brought this to the attention of our members and they should be taking appropriate steps to ensure, where applicable, their properties meet the requirements of the regulations.

## Specific Issues for Consultation

(i) Do you consider that the proposed Regulations will provide improved protection for the aquatic environment?

The regulations should provide improved protection for the aquatic environment by making sure that the sectors covered by the regulations take precautions to prevent oil spills and leaks into sources of water.

(ii) Are there any activities other than those specified in draft regulation 3(2) which should be exempted from the Regulations?

NIFHA has no comment to make regarding this,

(iii) Are the timescales for the replacement of old tanks reasonable?

The timescales for replacement of old tanks seem reasonable.

(iv) Have you any comments to make on the sectors to which the Regulations will apply?

NIFHA has no comment to make regarding this,

(v) Do you consider the enforcement provisions are reasonable and effective?

The enforcement provisions should be applied in line with the amount of damage caused by any oil spillage or leakage and the cost of removal of the oil from any water sources. The enforcement provisions seem forceful enough to act as a deterrent to breaching the regulations.

(vi) Have you any comments on particular aspects of the proposed Regulations or the regime in general?

NIFHA are concerned about the cost implications for our members and would ask if there will be grants available for social landlords to upgrade their storage equipment.

I hope you find our response useful, if you require any further clarification please do not hesitate to contact me.

**Submitted on behalf of NIFHA by:**

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