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Dear Olwen and Sujata

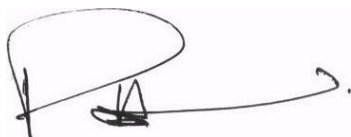
Consultation on proposals for time limiting of water abstraction licenses

The British Aggregates Association (BAA) represents the interests of some 90 members. 60 are independent and privately-owned SME quarry companies throughout the UK with some 10% of national output and operate from over 100 sites. We are active members of the CBI Minerals Group.

We fully support the submission being made collectively on behalf of the CBI Minerals Group and the individual company, organisation and associations. This is extended to the 90 individual members of the BAA.

Many of our member operations take place below the water table and it is necessary to dewater to enable extraction. In most cases little or no net water abstraction occurs with water being returned to the same aquifer or one adjacent. We believe that imposing an abstraction license in such cases amounts to bureaucratic overkill and these operations should be exempt as already suggested for the previous consultation on abstraction exemptions submitted by BAA on 22nd July. .

We would also note again that in the current recessionary conditions in the country that this imposition is particularly and unnecessarily onerous. Additionally the industry is currently facing an unprecedented level of government consultation and new regulation much of which is neither welcome nor necessary; and contravenes both UK and EU better regulation intentions and targets.



Peter Huxtable Secretary

