

# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Domestic Laundry Cleaning Products Consultation  
Defra  
Area 2A, Ergon House  
Horseferry Road  
London, SW1P 2AL

Dear Domestic Laundry Cleaning Products Consultation Team,

Thank you for giving the Salmon & Trout Association the opportunity to respond to the consultation of the 'options for controls on phosphates in domestic laundry cleaning products in England'.

The Salmon & Trout Association (S&TA), which was recently awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 100,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of water, the aquatic environment and all its dependent species.

The S&TA supports the response from Wildlife and Countryside LINK, but would like to reiterate a few key points.

**Q1. *What would be the extent of the cost to industry in the event that controls on phosphates in domestic laundry cleaning products were introduced?***

We believe the costs to the industry are not significant, given that only 10-17%, of the industry still uses phosphates. This is supported by the preliminary Cost Effectiveness Analysis of the Water Framework Directive (WFD), which stated that the most cost effective way of achieving a reduction in phosphates in water was to place controls on phosphates in domestic laundry cleaning products (DLCPs).

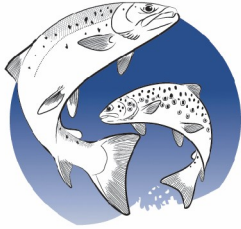
**Q3. *Should a voluntary or a regulatory approach be taken to controlling phosphate levels in detergents, and why?***

We feel a regulatory approach must be taken to ensure a guaranteed reduction in DLCP derived phosphates reaching our watercourses. We feel environmental gains can not be guaranteed by relying on voluntary controls and, as DLCPs are arguably the easiest phosphate source to remove, the opportunity should not be missed.

**Q4. *If regulatory controls were introduced, what are your views on exempting smaller manufacturers?***

We are against any exemptions for smaller manufacturers, as we feel suitable alternatives do already exist and the proposed 6 year phasing in of the ban, by 2015, allows ample time for modifications.

**Q5. *If controls are not introduced on phosphate in laundry detergents, what other mechanisms should be considered to reduce phosphate levels in surface water bodies?***



# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

The S&TA would like to see the regulatory ban of phosphates in DLCP as the first step in a new programme of measures to reduce phosphates reaching aquatic systems, and not as an alternative to other measures.

Catchment sensitive farming (CSF) initiatives to reduce phosphates reaching watercourses need to be assessed and, if unsuccessful, new measures, such as water protection zones, should be implemented. Water Industries should also be encouraged to increase phosphate stripping at sewage treatment works with high phosphate effluent, in sensitive catchments. A further regulatory ban should also be implemented to remove phosphates from dishwasher detergents and associated industries products.

**Q6. *What are your views on the feasibility of the extension of controls to cover dishwater detergents and industrial and institutional use in future?***

We feel the decision to exclude dishwater detergents in this proposal, was very unambitious, especially as suitable alternatives already exist, and because dishwasher detergents are responsible for comparable levels of phosphate reaching water systems as DLCPs. We therefore strongly support an extension of controls to cover dishwasher detergents and industrial and institutional use of phosphate in the immediate future.

**Q7. *How effective would controls be if they were applied at i) a regional level or ii) a national level***

We believe a ban must be implemented nationally to ensure compliance.

## Summary

The S&TA strongly supports a total regulatory ban of phosphates in DLCPs. We feel this should be implemented nationally, and should be extended to include phosphates in dishwater detergents and industrial and institutional use.