

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment
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11th May 2010 (addendum letter)

Planning & Natural Resources
Division
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Dear Sirs

Consultation Paper on the Control of Pollution (Oil Storage) Regulations (Northern Ireland) 2010

I refer to your letter of 26 March 2010 in relation to the above mentioned consultation and thank you for the opportunity to respond.

While CNCC is not qualified to comment on the technical aspects of this Consultation Paper, we would welcome this as an important addition to the measures available to meet the requirements of the Water Framework Directive. We are pleased to see a more proactive approach to the issue of leakage from oil storage tanks, particularly in view of the fact that corresponding legislation has been in place in England and Wales since 2001.

CNCC would like to stress the importance of reducing oil-related pollution incidents since the decrease in numbers of these occurrences has now levelled off. We believe that a total of 220 such incidents per year remains far too many in view of the serious consequences of oil pollution to freshwater ecosystems.

Yours sincerely



**PATRICK CASEMENT
CHAIRMAN**