

# National Bargee Travellers Association

## Response to Department for Environment, Food and Rural Affairs

### Consultation on cleaner domestic burning of solid fuels and wood

#### Section 1 – Introduction: About you

1. What is your name?

National Bargee Travellers Association

2. What is your email address?

secretariat@bargee-traveller.org.uk

3. What is your organisation?

Other

The National Bargee Travellers Association (NBTA) is a volunteer organisation formed in 2009 that campaigns and provides advice for itinerant boat dwellers on Britain's inland and coastal waterways. The term Bargee Traveller includes anyone whose home is a boat and who does not have exclusive use of a permanent mooring for their boat with planning permission for residential use. The NBTA represents individuals who live on boats on UK waterways and who do so without having a permanent residential mooring. Such boaters live in an itinerant fashion, moving regularly from place to place as is either permitted or required under a number of pieces of legislation. The NBTA is the only national organisation in Britain dedicated to upholding and defending the rights of itinerant boat dwellers. The NBTA has members on all the major navigation authorities' waterways and beyond. There are no accurate statistics for the number of boat dwellers in the UK but estimates suggest that at least 50,000 people live on boats of whom 15,000 people are itinerant. The actual numbers are likely to be greater as a considerable number of boat dwellers will not be known about beyond their immediate community.

4. Would you like your response to be confidential?

No

5. What is your location?

The NBTA is a UK-wide organisation.

#### Section 2 - Wood

Burning wood with a high moisture content produces more smoke than burning dry wood (ie wood with less than 20% moisture). We want to reduce the use of wet wood without preventing people seasoning (air drying) unseasoned (wet) wood at home. Wood sold in smaller quantities is more likely to be used immediately, i.e. without being dried at home. We want to ensure occasional stove users who buy small volumes of wood for convenience are not unwittingly burning wet logs that produce high levels of smoke. We intend to limit the sales of wood sold in smaller sizes of packaging to dry wood only. Wood pellets are dry enough not to be affected, and so are not in scope of this consultation.

For those people who don't purchase their wood, and instead use wood gathered from their own

land or given to them, we will work with the Forestry Commission to ensure that advice is provided on how to properly store and season wood. They already have a helpful guide.

From the responses to the Call for Evidence, there was conclusive support for restrictions on wet wood sales, either covering all wet wood or sales of volumes under 2m<sup>3</sup>. Some respondents expressed concerns highlighting existing shortage of supply. Other concerns reflected that many fuel suppliers are quite small and therefore more vulnerable should we opt to make this change (with little storage space to store larger quantities of wood, for example).

Net bags of logs sold by retailers such as service stations, DIY stores and garden centres generally contain wet wood and are likely to weigh between 5 – 15kg. These nets will occupy much less than 0.5 m<sup>3</sup> volume each (probably closer to 0.1m<sup>3</sup>). This quantity of logs is likely to be sufficient to keep a stove lit for a few hours and is a convenient size to be picked up and carried home for immediate use. However at present there is nothing to advise the consumer that this wood is not ready to be burned, and needs seasoning before use.

As expected, responses to the Call for Evidence suggested that only a minority of households burn wood as a primary heat source. They also indicated that wood-burning is less common among low-income households who tended more towards burning coal. In order to implement this phase out, government intends to build upon the existing industry led Ready to Burn certification scheme. What this means is that anyone wishing to sell wood in volumes under the specified cut-off will need to apply to the industry's certification agency or equivalent (currently Woodsure). Enforcement will be carried out through the certification agency's audit process complemented by Local Authority enforcement through Trading Standards.

6. We are considering a cut-off point for the sale of wet wood to householders. In line with feedback from the Call for Evidence, we are proposing that this is set at 2m<sup>3</sup>, but we are inviting your views on this point. Please indicate what limit you think a cut-off point should be set at.

Bags/nets only

Up to 0.5m<sup>3</sup>

Up to 1m<sup>3</sup>

Up to 2m<sup>3</sup>

All wet wood

Other X

Neither agree nor disagree with any of the above.

Please provide reasons or evidence to support your answer.

Any of the above cut-off points will make wood more expensive to buy because producers, wholesalers and/or retailers will incur greater costs, such as for storage, which will inevitably be passed on to the purchaser. If they buy wood, people on low incomes and those in fuel poverty are more likely to buy wood in small quantities due to being unable to afford to buy larger quantities. Boat dwellers, either working or retired, are typically on low incomes and thus more likely to be in fuel poverty. Boat dwellers will be one of the groups most adversely affected because they do not have the choice to move to gas or electric heating. Before any changes are implemented, DEFRA must implement measures to mitigate the effect of these changes on people in fuel poverty or on low incomes.

7. Do you think that suppliers and retailers should be given a transition period to use up existing stocks of wet wood or allow time for it to air-dry?

No transition period

Transition period of 1 year

Transition period of more than 1 year

Please provide reasons or evidence to support your answer

As it takes 2 years to fully season wet wood for heating, the transition period should be 2 years.

8. Do you think that smaller suppliers and retailers should be given a longer transition period?

Yes

No

Don't know/don't have an opinion

9. We are proposing that suppliers selling wet wood in volumes larger than the agreed cut-off point should be required to provide clear instructions to their consumers about how long the wood should be "seasoned" before it is burnt. Do you agree or disagree with this proposal?

Agree

Disagree

Neither agree nor disagree

Don't know/don't have an opinion

10. Do you agree or disagree that wood fuel suppliers should be required to be members of a certification scheme that provides assurance (via testing and auditing) that the wood is of a moisture content of 20% or less?

Agree

Disagree

Neither agree nor disagree

Don't know/don't have an opinion

11. Do you agree or disagree that retailers selling wood should be legally required to store the wood in such a way that it will not become wet?

Yes

No

Don't know/don't have an opinion

12. In order to comply with the proposal to require all businesses selling wood in volumes under 2m<sup>3</sup> to ensure that it is dried to below 20% moisture, what adjustments, if any, would your business need to make? Please select one of the following.

Purchase a kiln to dry wood

Buy other equipment to season wood

Wouldn't need to adjust

Other (please specify)

N/A

13. Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Unlike the housed population, a significant proportion of boat dwellers burn wood as a primary heat source, and this is particularly true of the poorest boat dwellers, whose main or only source of heating is foraged, waste or donated wood. In general, boat dwellers do not have storage space to season wood for any length of time. Some boat dwellers work in occupations such as tree surgery where wood is a by-product which they use for heating.

Nearly all boat dwellers use wood as kindling to light their solid fuel stoves. Even those who keep their stoves alight around the clock in winter may need to use wood to get their fire going

in the morning.

### Section 3 - Coal

As well as working to meet our stringent, legally binding targets for reducing emissions by 2020 and 2030, government has committed in the Clean Air Strategy to legislate to ensure only the cleanest domestic fuels will be available for sale. We want to see a move away from using traditional house coal towards using less polluting fuels in the domestic setting by only allowing the sale of smokeless coal (or anthracite) and low sulphur manufactured solid fuel for the purpose of domestic heating. This is in line with the Clean Growth Strategy, which sets out our commitment to phasing out high carbon fossil fuels in the future, starting with homes off the gas grid.

Responses to the Call for Evidence revealed that a majority of coal suppliers (52%) considered that phasing out traditional house coal could have a significant impact on their businesses. Small coal merchants said they were most likely to go out of business, and would need time to adjust. Respondents said that phasing out traditional house coal could also be problematic for off-gas grid consumers in fuel poverty. However, given the health impacts, we are minded to take action to accelerate this shift to cleaner fuels. We have considered potential mitigating actions for vulnerable groups, including those living in fuel poverty, in section 6.

14. Do you agree or disagree that government should phase out the use of traditional house coal for domestic combustion?

Agree

Disagree

Neither agree nor disagree X

Don't know/don't have an opinion

15. If you agree, what would be the most appropriate end date for phasing out the use of traditional house coal for domestic combustion?

2019

2020

2021

Other

Don't know/don't have an opinion X

Please provide reasons or evidence to support your answer

16. In phasing out the use of traditional house coal as a domestic fuel, what do you consider is a reasonable transition period to allow industry and householders to use up existing stocks?

No transition period

Transition period of 1 year X

Transition period of 2 years

Don't know/don't have an opinion

17. In phasing out the use of traditional house coal as a domestic fuel, government is minded to apply this to all businesses because of the health and environmental benefits of this approach. We acknowledge this may be harder for some businesses than others. Do you agree or disagree that this approach should apply to all businesses?

Agree

Disagree

Smaller businesses should be given a longer transition period X

Neither agree nor disagree

Don't know/don't have an opinion

18. If you disagree, which of the following should apply? Please select all the options you

believe should apply.

- Small and micro businesses to be exempt, eg corner shops, independent garages, small merchants
- Other businesses to be exempt
- Coal to only be sold through authorised coal merchants
- Total phase out
- Don't know/don't have an opinion

Please provide detail of which businesses should be exempt and your reasoning.

19. In phasing out traditional house coal as a domestic fuel, government is minded to apply the phase-out nationwide across England. Do you agree or disagree?

Agree

Disagree

Neither agree nor disagree X

Don't know/don't have an opinion

If you disagree, which of the following should apply?

Coal sales to be phased out in urban areas only

Coal sales to be limited to other specific area (please specify)

Don't know/don't have an opinion

20. Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Phasing out house coal will make coal more expensive to buy because producers, wholesalers and/or retailers will incur greater purchase costs because house coal is the cheapest coal. This will inevitably be passed on to the purchaser. Boat dwellers, either working or retired, are typically on low incomes and thus more likely to be in fuel poverty. Boat dwellers will be one of the groups most adversely affected because they do not have the choice to move to gas or electric heating. Some boat dwellers burn house coal as a primary heat source, especially poorer boat dwellers and those in fuel poverty, because it is the cheapest type of coal.

Before any changes are implemented, DEFRA must implement measures to mitigate the effect of these changes on people in fuel poverty or on low incomes. If comparable quality low emission solid fuel can be purchased as cheaply or more cheaply than house coal, then these boat dwellers will switch to the low emission solid fuel. This would obviously also apply to all other people on low incomes or in fuel poverty who need to use coal for heating. Therefore DEFRA must give top priority to supporting and promoting the development and manufacture of low cost, low emission solid fuel for heating.

Boat dwellers often rely on coal boats and boatyards for their solid fuel supplies. These are usually very small or micro businesses with small margins. They supply fuel to people who rely on coal to keep warm in winter. Any transition to low emission fuels carries the risk that they will lose customers who are essential to their viability. DEFRA must ensure that these businesses are supported through any transition and do not cease trading.

#### **Section 4 – Manufactured solid fuels**

Many parts of the UK are Smoke Control Areas (SCAs) where householders are not allowed to emit smoke from a chimney of a building unless they are burning an authorised fuel or using exempt appliances, for example burners or stoves. At present the sulphur content of solid fuels is limited to 2% in SCAs but not elsewhere. There are a number of smokeless solid fuels which are marketed for sale outside SCAs where the sulphur content can be significantly higher. For a fuel to be used in an SCA, it also has to pass a smoke emission test ensuring that it emits no more than 5 grams of smoke per hour of operation. High sulphur content fuels are harmful to

human health and the environment. It is hard for consumers to identify at point of sale whether a product is high sulphur or not. As government already regulates the sulphur content of all liquid fuels, and in line with feedback from the Call for Evidence, government intends to extend the 2% sulphur content limit to all manufactured solid fuels nationwide with a view to reducing it further over time. We are also proposing to apply the smoke emissions standard, which is currently in place for SCAs, nationwide. This will provide a clear minimum standard for all manufactured solid fuels in England.

In response to the Call for Evidence, many in the industry indicated that high sulphur fuels had entered the market due to the low cost of high sulphur petroleum coke as a raw material (a by-product of oil refining). Flue and stove manufacturers highlighted the harm that can be caused to appliances and chimneys through burning high sulphur pet-coke products which can burn very hot and can destroy grates and chimneys. Conversely, there was also some concern about the costs to consumers of applying sulphur standards.

21. Do you agree or disagree that government should introduce a standard for all manufactured solid fuels which confirms they are below 2% sulphur and meet a smoke emission limit of 5g /hr?

Agree

Disagree

Neither agree nor disagree

Don't know/don't have an opinion

22. In introducing a sulphur and smoke emission standard, do you consider that there should be a transition period for suppliers and retailers?

No transition period

Transition period of 1 year

Transition period of more than 1 year

Please provide reasons or evidence to support your answer

A transition period of one year will enable suppliers and retailers to use up existing stocks.

23. Do you agree or disagree that, over time, the 2% sulphur limit should be further reduced to 1% sulphur?

Agree – 1%

Agree – some other percentage (please state below)

Disagree

Neither agree nor disagree

Don't know/don't have an opinion

If you agree, over what time period should the further reduction be introduced?

1 year

2 years

3 years

Don't know / not applicable

Government intends to implement a nationwide sulphur and smoke standard through a certification process. All solid fuel suppliers would be required apply for certification of their products as meeting a 2% sulphur limit and 5g/hr smoke test. A clear logo would be required on all packaging showing that the product was approved. This would be supported by audit, random testing and Local Authority enforcement. This would replace the existing Clean Air Act exemption requirements for solid fuels. Fuels which are already certified as having passed this test would not need to be retested, but would need to apply the new, clear logo.

24. Do you agree or disagree that government should introduce a clear labelling requirement to demonstrate that fuels meet the standard?

Agree

Disagree

Neither agree nor disagree

Don't know/don't have an opinion

25. In order to comply with the proposal to phase out traditional house coal and apply sulphur and smoke emissions standards to all solid fuels, what adjustment, if any, would your business need to make? Please select one of the following.

Would need to reformat our products

Wouldn't need to adjust

Couldn't adjust

Other (please specify)

N/A

26. Would you like to provide any further comments or evidence on our proposals or the questions in this section?

### **Section 5 – Carbon reductions**

Many manufactured solid fuels release a large amount of carbon dioxide for the amount of heat they provide. Some manufactured solid fuels contain biomass by-products, such as olive pulp, or coconut shells, as an ingredient, which lowers their overall carbon emissions. In line with government policy on climate change, we are considering whether we should, over the longer term, require a minimum biomass content for manufactured solid fuels. In line with government policy on climate change, our ultimate goal is to phase out the use of high carbon fossil fuels in the home. As a stepping stone towards this, the government is considering whether to encourage the increase of biomass by-product content within manufactured solid fuels, whilst ensuring they remain below emission limits. We want to ensure that policies in this area align with our carbon reduction targets. We are interested in your thoughts on how we drive the industry to re-formulate manufactured solid fuels to deliver carbon benefits. This practice is encouraged in Ireland through their carbon tax. We are not considering the introduction of a carbon tax, or any change in the tax regime for solid fuels. Instead, we are considering the introduction of a regulation to mandate a minimum biomass content for manufactured solid fuel.

27. Do you agree or disagree that government should, over the longer term, introduce a requirement that all manufactured solid fuels have a minimum biomass content?

Agree – please state percentage below

Disagree – no minimum limit

Neither agree nor disagree

Don't know

The maximum feasible percentage given the possible increase in emissions.

28. For businesses: If government mandated a biomass content how long would it take you to adjust?

• We wouldn't need to adjust

• 1 year or less

• 2 years

• 3 years

• 4 years or more

• We wouldn't be able to adjust

N/A

29. Would you like to provide any further comments or evidence on our proposals or the questions in this section?

Biomass as fuel for heating (and for other purposes) should only be obtained as a by-product of agriculture. Growing dedicated biomass crops for heating, industrial or transport purposes uses up land that is needed for food production.

### **Section 6 – Exemptions**

Responses to the Call for Evidence reveal some concern about the impact the proposed measures could have on those in fuel poverty. We want to ensure that measures introduced achieve environmental benefits but do not have an adverse impact on vulnerable groups. In this consultation, we are looking for views on the most effective ways of avoiding such an impact whilst supporting the government's objectives under the Clean Growth Strategy to phase out high carbon fossil fuel heating during the 2020s.

30. We are interested in your views on how government should support those in fuel poverty with this transition away from high-carbon fossil fuels

In order to equalise and mitigate the impact on low income households and those in fuel poverty, financial support must be made available to assist those on the lowest incomes to switch to burning cleaner wood and coal. Boat dwellers are far more likely to be on the lowest incomes and/or in fuel poverty compared to the rest of the population. In particular, given that boat dwellers have been excluded from existing "clean grants" for equipment such as solar panels and insulation, it is important that boat dwellers are included in any grant schemes for clean burn fuels and technology. We reiterate that DEFRA must give top priority to supporting and promoting the development and manufacture of low cost, low emission solid fuel for heating that is comparable to the current cost of house coal.

31. Would you like to provide any further comments or evidence on this section?

### **Section 7 – Implementation**

Our objective is to minimise burdens for Local Authorities (eg Trading Standards Officers/ Environmental Health Officers) by establishing industry-led certification and labelling by suppliers, backed up by a clear and straightforward enforcement policy. Currently, these bodies have powers to issue fixed penalty notices to deal with problems caused by litter, graffiti and noise, for example. Under the proposed legislation we would extend the range of the current powers so these bodies can issue fixed penalty notices against retailers or suppliers selling domestic burning products that did not have the appropriate certification logo or were found to have an excessive moisture content.

32. What do you think would be an appropriate level of fixed penalty related to the sale of domestic burning products?

£300

£500

Other (please specify)X

Any penalties should be on a sliding scale related to the profits of the business.

33. Do you think that local authorities should be required to use any funds received through fixed penalties related to the sale of domestic burning products for a specific purpose?

Yes – please specify below X

No



Don't know/don't have an opinion

Funds received should be used for support for those in fuel poverty or on low incomes to heat their homes in winter, through food banks; charities; and other support organisations.

34. Do you agree or disagree that this will deliver our objective of establishing a clear and straightforward enforcement policy, minimising burdens for Local Authorities?

Yes

No

Don't know/don't have an opinion X

Please suggest any alternative proposal that you consider to be more effective in delivering our objectives.

Using incentives rather than enforcement. Supporting and promoting the development and manufacture of low cost, low emission solid fuel for heating that is comparable to the current cost of house coal. This would act as an incentive for people to switch to low emission fuel for heating and would help suppliers and retailers to maintain sales in the absence of house coal.

35. Government will provide advice and guidance to retailers selling domestic burning products. What format should this take?

Leaflets X

Point of sale displays X

Social media X

Information provided with the product X

Other (please specify) X

Postal or e- mailshots to known types of suppliers, such as coal merchants; boatyards and coal boats.

## Section 8 – Information

Many respondents to the Call for Evidence said that we should provide clear information to people on how to burn better, including making people aware of the impacts of burning waste or using more polluting fuels, and the correct use of appliances. Defra has produced an information leaflet. For more detail, see the BurnRight website.

36. What information do you think would be helpful to enable householders to reduce their impact from domestic burning?

Information provided to house dwellers may be unsuitable or irrelevant for boat dwellers. Information that relates to the use of solid fuel on boats should be produced. Information for boat dwellers could be compiled and provided through the Boat Safety Scheme and local Fire and Rescue Services and through Boat Fire Safety Week which is led by Fire and Rescue services.

37. What do you think would be the most effective way of communicating information to householders? (tick all that apply)

- Through retailers X
- Appliance manufacturers X
- Fuel suppliers X
- Chimney sweeps X
- Press
- Charities
- Social media X
- Doctors surgeries

- Mail shots
- Advice with council tax
- All of the above
- Other (please specify) X

Boat Safety Scheme; Fire and Rescue Services; Boat Fire Safety Week (usually in May or June); local and national Traveller support organisations.

38. For householders: Where do you buy your fuel? (tick all that apply).

- Petrol stations X
- DIY stores X
- Supermarket X
- Garden centres X
- Local suppliers X
- Coal merchant X
- Farmer X
- Online X
- Other (please specify) X

Coal boats and boatyards.

### **Section 9 –Additional suggestions**

Do you have any additional comments/views that you wish to provide on the content of this consultation?

As with the rest of the population, the boating community would benefit from cleaner air and we support this objective. The NBTA is, however, concerned that measures may be taken which have a disproportionate impact on people who live on boats compared to boat dwellers' relatively low impact on air quality.

Any changes must take fully into account the needs of and the impact on boat dwellers. The vast majority of boat dwellers rely on solid fuel stoves as their only source of heating and the impact of any changes on boat dwellers will be severe and immediate.

The majority of boats have solid fuel wood, coal or multi-fuel stoves as their only source of heating. In many cases the stoves also function as a way of heating water and cooking. This is not a recent fashion but is a traditional feature of British narrowboats and barges. As the primary source of heat, they are an integral part of most boaters' homes, rather than an aesthetic add-on to an existing central heating system. Solid fuel stoves on boats are required to comply with the Boat Safety Scheme and therefore have been installed legally and in good faith.

The impact of any policy which restricts the use of wood burning or solid fuel stoves on boats would be substantial, especially in comparison to the relatively small number of stoves in question. Any policy which affects how stoves are used on boats could have a significant impact on the lives of those who live on boats and it should not be assumed that other options are readily available. Stoves on boats constitute a small fraction of the number of stoves in the UK, however for their users they play a fundamental role in their homes.

Boat dwellers vary in their use of wood as a heating fuel. Probably the majority of boat dwellers use both wood and coal in different quantities. Wood is normally needed to light the coal in a stove and for the first ten minutes of burning. Some boat dwellers prefer to use the more expensive smokeless coals whether or not they are in a smoke control zone. Others use semi-smokeless coal or lignite briquettes. Some stoves are designed to burn only wood or only coal.

However, the poorest boat dwellers, including those who would otherwise be homeless, rely on foraging or salvaging scrap wood to heat their homes. Coal is a significant annual expense for a boat dweller and the lower the boat dweller's income, the less likely they are to be able to use good quality, smokeless coal. Boat dwellers obtain coal from a variety of sources including coal and diesel boats trading along the waterways; these boats do not necessarily trade exclusively in one area and thus carry a range of stock for use in both smoke control zones and in rural areas.

The majority of boat dwellers use bottled LPG gas for cooking and in some cases for heating water. However, it is very rare for a boat to have bottled gas heating, due to the dampness, condensation and fumes caused by this source of fuel; the greater risk of carbon monoxide poisoning from gas heaters and the prohibitive cost. Most boats use bottled gas in 13kg bottles or smaller. The cost of buying gas in 13kg bottles is almost double the price per kg compared to buying gas in 47kg bottles which are used in houses where there is no mains gas. Moving to gas heating is not feasible for boat dwellers.

In general, boats do not have electric heaters installed and are not connected to the grid which further reduces viable options. Electric heaters, for example, are very energy intensive and would require 240v electricity to operate which many boats lack (being on a 12v system). A shift to electric heaters therefore could have the unintended consequence of increasing the running of engines to create the electricity to power the heaters. This could easily create a worse outcome in terms of air pollution than the original solid fuel stoves.

Anecdotally we believe that less than half of boats used as homes are able to use 240v shore power electricity in the limited places where it is available. In order to use shore power, a boat has to be fitted with an auxiliary 240v wiring circuit and alternative connections or plugs for appliances. In some cases, a boat will have a 240v connector to charge the batteries but no other 240v equipment. Shore power is usually only available at purpose built permanent moorings in marinas. A minority of permanent moorings along the line of the waterway have shore power. A handful of visitor moorings have been fitted with 240v electricity hook-ups. Some boats have inverters to produce 240v electricity independently but using an inverter requires a greater number of batteries and many more engine hours to charge these batteries.

Every year, more boat dwellers (and leisure boaters) fit solar panels to generate electricity and reduce the need for running engines. These panels charge the domestic batteries. They can be very effective in the lighter months between April and October. Some boaters use wind generators to charge domestic batteries. However in winter there is not normally enough daylight for solar charging to avoid using the engine to charge batteries. The amount of electricity generated by solar or wind can be sufficient to run lighting and pumps but is not enough to run electric heaters.

Most inland navigation authorities require a Boat Safety Scheme certificate issued by a registered Boat Safety Scheme examiner before they can be licensed. Unlicensed boats can be seized and removed, and/or the owners prosecuted. A Boat Safety Scheme certificate lasts for 4 years and certifies that the engine fuel, engine and domestic electricity, batteries, gas systems and solid fuel appliances meet the safety standards prescribed by the scheme. Most inland navigation authorities also require Third Party Liability insurance of at least £2 million as a condition of licensing.

A significant number of retired people live on boats and many are on the lowest of fixed pension incomes. Some low income pensioner boat dwellers have encountered barriers to claiming Winter Fuel Allowance due to using an address for correspondence of a relative who already receives the payment.

The poorest boat dwellers are likely to be living on minimal incomes from casual work or inadequate state pensions. Many people who live on boats do so because it is the only way that they can live within their means. Many boat dwellers on very low incomes have chosen to live on a boat because they value the independence from state benefits that living on a boat enables.

We would urge DEFRA to act proportionately on this issue.

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October 2018**

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