

Dan Tomlinson
The Exchequer Secretary to the Treasury
HM Treasury
1 Horse Guards Road
London, SW1A 2HQ

17 December 2025

By email only: [email address redacted]

Dear Minister,

Changes to the landfill tax

The British Ports Association represents the overwhelming majority of port authorities and operators across the UK. Our members own and operate over 400 ports, terminals and port facilities, accounting for 86% of UK port throughput, 100% of all passenger movements, all the UK's main energy-related ports, as well as many more. Alongside our partners in the rivers, canals and waste management sectors, including renewable Energy from Waste and Biomass plants, we are writing to express our alarm at imminent changes to landfill tax exemption that will have a minimal impact on the Exchequer but will have grave consequences for investment in several important ports. Additionally, we understand that there is a risk that renewable Energy from Waste and Biomass plants will pass the cost of this tax change onto their Local Authorities.

We are deeply concerned by the Treasury's recent decision to remove the landfill tax exemption for stabilisers used in dredgings. The consequences of this decision will badly damage the Government's commitment to boosting growth, economic stability and its mission-led focus on infrastructure. The problems include, but are not limited to:

- The collapse of major industrial and development projects, particularly in ports, rivers and canals;
- Undermining the objectives of the National Wealth Fund, which includes ports as a priority sector;
- Delaying net zero as green energy and industrial projects in port areas become unviable;
- The unintended consequence of replacing the recovery of a waste with a use of high carbon virgin raw materials such as lime and cement, damaging the Circular Economy principals Government wishes to urgently embrace;
- Costing thousands of jobs both during and after development in the North-east alone;
- Costing Local Authorities and taxpayers at least £20m, and likely much more, each year, effectively wiping out the negligible gain in tax take from removing the exemption; and,
- Adding £3m per 10,000 tonnes of dredging, which will delay the clean-up of our contaminated waterways, impair navigation of our waterways, and potentially increase flooding risk.

We understand that secondary legislation to remove the exemption in April 2027 will be drafted early in 2026. We urge the Government to reconsider this decision as a matter of

urgency. We have responded to different consultation exercises undertaken by the Treasury but the Government's response does not adequately capture the significant adverse unintended and harmful economic and environmental consequences of this decision. We would welcome a meeting at your earliest convenience to discuss any concerns the Treasury has around the impact of the current exemption and our concerns about the forthcoming changes.

Yours sincerely,



Richard Ballantyne OBE

Chief Executive

This letter is supported by:

Campbell Robb, Chief Executive, Canal and River Trust - the UK's largest canal charity, looking after 2,000 miles of canals and rivers across England and Wales

Richard Brooke, Chief Executive Officer, Augean – operates 22 sites across the UK supporting the circular economy to critical sectors

Mike Turner, Managing Director, MVV Environment Ltd – operator of 4 Energy from Waste and Biomass Facilities across the UK

Nick Hartley, Group Managing Director, Ebsford Environmental –river restoration and flood management group

Rothen Group - waterway engineering and maintenance experts servicing the UK's canals and rivers

James Maclean, Chief Executive Officer, Land & Water - the UK's largest inland dredging and environmental marine contractors

Alan McPherson, Chief Harbour Master, Forth Ports Limited - one of the largest, leading port operators in the UK

Note: Several signatories have been redacted, including Port Operators, Energy from Waste, Operators and Industry Associations which collectively represent a wider constituency than the signatories named publicly.

CC:

Keir Mather MP, Maritime Minister
[Email addresses redacted]