

SEPA Waste Data Consultation

Overview

<i>General Comments</i>

Detailed Response

Specific Comments

Questions 1-3 ask for contact information which we will provide

4	Do you agree that the additional content of the licensed/permitted site returns as detailed in Section 2 of this consultation should be made available to the public?
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Scottish Water has no objection to the proposed additional data return information being published.

5	If you have answered “no” to Question 4, please tell us of your concerns and specify areas you think should not appear in the public domain.
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N/A

6	Do you agree that the content of complex exempt activity returns as detailed in Section 2 of this consultation should be made available to the public?
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Scottish Water has no objection to the proposed additional data return information being published.

7	If you have answered “no” to Question 6, please tell us of your concerns and specify why you do not agree.
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N/A

8	Do you have any other comments on the proposal to make more information from waste data returns available to the public?
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Timescales

It is not clear from the consultation documentation when SEPA intends to implement the proposals and Scottish Water would like to highlight that some of the changes, such as application of geographical origin and destination codes to each waste movement, may require significant alterations to the waste management systems that are used within the business. Changes to these complex IT systems may require strategic investment and it may not be possible to accommodate any changes until this has been secured. Scottish Water would, therefore, like to discuss the proposals with SEPA to understand the implementation timescales and agree a programme of

change.

Appendix 1, Table C

The proposals only allow one 'management method' to be selected. It is not clear how this would be chosen when the waste is subject to more than one treatment activity.

For example, Scottish Water imports some wastes to the head of waste water treatment works and these wastes, therefore, undergo more than one type of treatment as part of the primary and secondary waste water treatment processes i.e. physical treatment (screening/degritting/settlement) and biological treatment (activated sludge). If the resultant sludge is then limed, this would be another treatment process (chemical treatment).

Appendix 2, Geographical Codes

The Origin Codes for WML/PPC Returns do not match those for Exempt Site Returns; there are some missing from the latter category e.g. Inverclyde.

There is also duplication of some areas in the codes for WML/PPC Returns. For example the same area could be captured under 'Aberdeenshire (AS)', 'Highlands, Islands & Grampian HIG' and 'Moray, City of Aberdeen & Aberdeenshire (WSA4)'. Some guidance will be required on which is the preferred code in such circumstances.

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