

## Alkaline hydrolysis ('water cremation') regulation in Scotland – A Scottish Government Consultation

### Overview

General Comments

### Detailed Response

Specific Comments

<b>1</b>	<p><b>Do you think that the Scottish Government should introduce regulations to allow the use of alkaline hydrolysis as a method of disposal of human remains in Scotland? Please also provide the reason for your answer.</b></p> <p><b>(see paras 3 – 7)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>2</b>	<p><b>Have the sustainability claims made by manufacturers influenced your response to Question 1? Please provide details.</b></p> <p><b>(see para 11)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>3</b>	<p><b>Assuming that alkaline hydrolysis is to be allowed, should it be regulated in a similar manner as cremation?</b></p> <p><b>(see para 22 – 23)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	



<b>4</b>	<p><b>Do you agree that the same procedure as applies to opening new crematoria should apply to opening alkaline hydrolysis premises?</b></p> <p><b>(see para 29)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>5</b>	<p><b>Should alkaline hydrolysis operators be subject to inspection in the same way as cremation authorities?</b></p> <p><b>(see para 32)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>6</b>	<p><b>What information do you think should be included in a management plan by a provider of alkaline hydrolysis?</b></p> <p><b>(see para 33 – 37)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>7</b>	<p><b>Do you agree that there should be statutory application forms similar to the cremation application forms?</b></p> <p><b>(see para 39)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>8</b>	<p><b>Do you have any views on the provision of alkaline hydrolysis for children under age 4 and for stillborn babies (even though no ashes are likely to result)?</b></p> <p><b>(see para 42 – 44)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
<b>9</b>	<p><b>Do you have any comments on extending the requirement for a Form E1 (as applies when the body is released for cremation by COPFS) to alkaline hydrolysis?</b></p> <p><b>(see para 45)</b></p>



No view/ comment	
Comments:	
10	<p><b>Do you agree that operators of alkaline hydrolysis (and funeral directors) should be required to comply with the same requirements and timescales for handling of the remains as they are for ashes following cremation?</b></p> <p><b>(see para 47 – 48)</b></p>
No view/ comment	
Comments:	
11	<p><b>Do you agree that the content of the statutory cremation register for bodies should be replicated for alkaline hydrolysis?</b></p> <p><b>Please add any comments on what you think should be different and why.</b></p> <p><b>(see para 49)</b></p>
No view/ comment	
Comments:	
12	<p><b>Do you agree that the content of the statutory cremation register for body parts should be replicated for alkaline hydrolysis?</b></p> <p><b>Please add any comments on what you think should be different and why.</b></p> <p><b>(see para 49)</b></p>
No view/ comment	
Comments:	
13	<p><b>Do you agree that the content of the statutory cremation register for stillborn babies should be replicated for alkaline hydrolysis?</b></p> <p><b>Please add any comments on what you think should be different and why.</b></p> <p><b>(see para 50 – 51)</b></p>
No view/ comment	
Comments:	



14	<p><b>Section 87 of the 2016 Act provides that where a person dies or is found dead within a local authority area, and no arrangements are being made for them to be buried or cremated, the local authority must make the arrangements. In these cases, should the local authority be able to use alkaline hydrolysis where it is available?</b></p> <p><b>Please provide reasons for your answer.</b></p> <p><b>(see para 52)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
15	<p><b>As noted in the consultation, supporters of alkaline hydrolysis have claimed that the liquid could be considered for sustainable disposal, such as fertilizer. If relevant consents are obtained, do you have any views on whether this should be an option?</b></p> <p><b>(see para 53 – 60)</b></p>
<p>No view/ comment</p> <p>Comments:</p>	
16	<p><b>Do you have any other comments on the regulation and use of alkaline hydrolysis which you wish to share?</b></p> <p><b>(see para 53 – 60)</b></p>
<p>Scottish Water would like to comment on two areas that are relevant to us.</p> <p>In terms of trade effluent, Scottish Water may grant consent allowing the waste liquid from alkaline hydrolysis to be discharged into the public foul sewer network as a trade effluent under Part II of the Sewerage (Scotland) Act 1968, where capacity exists and subject to standard technical assessments and controls applied to all proposed new discharges of trade effluent.</p> <p>Scottish Water has the right to impose conditions on the discharge of the waste liquid and to refuse to grant consent of a proposed discharge of the waste liquid into the public sewer, for example where capacity did not exist.</p> <p>Considering consent from Scottish Water will be subject to conditions or may be refused, Scottish Water encourages those promoting the introduction of the alkaline hydrolysis process to consider other sustainable ways of recovering or disposing of the waste liquid, as alternatives to discharging to the public foul sewer network.</p>	

In terms of Water Byelaws under the requirements of Water Byelaw 5 of The Water Supply (Water Fittings) (Scotland) Byelaws 2014, anyone who is installing or altering a water supply for non-domestic purposes, has a legal obligation to notify Scottish Water before carrying out the work. Advanced notification is critical, as certain plumbing arrangements if not installed correctly are at risk of causing contamination, with the potential to impact public health. It is an offence under the Water Byelaws to install this type of machine or process to a water supply without prior consent.

Where an alkaline hydrolysis (water cremation) machine or process is connected to a water supply, there must be backflow protection to a Fluid Category 5 level, within the process or upstream. This is to safeguard and protect the water supply to the building and the wider water mains network. Fluid Category 5 is the highest fluid risk on the scale contained within the Water Byelaws.

There is no mention of the requirements to comply with the Water Byelaws within the Hydrolysis regulation. If the requirements of the Water Byelaws was included, this would help to ensure these machines are installed legally and mitigate risk to public health.

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