

SEPA's CLIMATE CHANGE PLAN

RESPONSE OF THE ENVIRONMENTAL SERVICES ASSOCIATION

The Scottish Environmental Services Association ("SESA") is the sectoral trade association representing Scotland's managers of waste and secondary resources. SESA's Members seek to align economic and environmental sustainability through delivering compliance with relevant waste and environmental law.

Q1. Do you think the vision and objectives of the Plan are appropriate? What changes, if any, would you suggest?

SESA supports SEPA's vision and objectives. We welcome a review of SEPA's regulatory activities to ensure climate change is fully considered when determining environmental permits and taking regulatory decisions.

The waste management sector has made a significant contribution towards reducing greenhouse gas emissions as it transits from being a disposal towards being a recycling and recovery sector. This transition produces significant carbon savings through the generation of more renewable energy and recycling.

As part of its review of regulatory activities and decision making, SEPA must recognise that Scotland's waste management industry is working, through various regulated technologies, to increase its contribution to renewable energy generation and mitigating the effects of climate change. We can succeed only given the right regulatory framework.

SEPA correctly acknowledges the need to review its monitoring and assessment activities and, to avoid duplication, we suggest SEPA's monitoring of climate change uses existing reporting regimes. SESA's operating Members are already required to report transparent environmental indicators which provide a readily understandable assessment of the performance across the industry.

Q2. Is the programme of action set out in the plan comprehensive, realistic and credible?

SESA supports, in principle, the proposed programme of action to achieve SEPA's strategy and objectives, and we offer the following comments:

Immediate action:

EU Emission Trading Scheme

Cap and trade schemes, such as the EU Emissions Trading Scheme provide certainty of quantity of pollution/emissions. In playing its part in the development, implementation and enforcement of the Scheme, SEPA must seek stronger, legally binding targets, enforced over a longer time scale: otherwise too much uncertainty will continue to surround the price of carbon. This would reduce the incentive for businesses to make the necessary long-term decisions to move towards low carbon technologies.

Planning system

SESA suggests SEPA should play a much more proactive role as a statutory consultee in the planning system, by clearly indicating the positive role that proposed waste management developments will play in meeting Scotland's Climate Change objectives.

Longer term actions:

Regulation

Our response to question 1 noted SESA's support for an assessment of the climate change impacts of SEPA's regulatory activities and, whilst we recognise this has been set as a long term goal, we suggest planning for this starts now.

Our industry is driven by regulation. Significant protection of the environment, human health and mitigation of the effects of climate change was initially achieved by detailed regulation of process.

However, this type of regulation cannot be indefinitely enhanced without compromising the overall efficiency of the economy.

SESA has consistently advocated the need for modernised environmental regulation which focuses on clear environmental outcomes which encourages business to innovate and improve economic and environmental performance at lower cost.

While there has been some recent signs of improvement through the *Better Waste Regulation* initiative, Scotland has not been timely or particularly transparent in implementing the EU laws which are now the basis of national environmental law: there is still a greater need to regard implementation as a properly timed project in which those to be regulated should be regarded as legitimate partners. Lack of transparency and rushed fixes compromise our sector's ability to invest in recycling and resource recovery infrastructure.

Regulation must also provide a fair and level playing field so that operators in all parts of the Scotland, whether large or small, can be confident they will be treated in the same way.

In order to meet these aims, SESA advocates the development of a Waste Sector Plan with objectives agreed between SEPA and the industry, which could incorporate measures to mitigate the effects of climate change within the sector. SEPA should note that a Sector Plan was agreed by ESA and the Environment Agency. It contains a number of targets, including:

- a year-on-year reduction of the total greenhouse gas emissions (as CO₂ equivalent) per tonne of waste handled each year;
- an increase each year in the quantity of material recovered from the waste stream as a proportion of total waste handled.

SESA would be delighted to work with SEPA on the development of a Sector Plan for Scotland with similar objectives.

Informing and influencing

SEPA correctly proposes giving greater prominence to climate change when issuing advice and support to businesses. However, SEPA should go beyond simply raising awareness and initiate a targeted campaign of Scotland's waste producers to impress upon them the importance of sustainable waste management as a means of reducing greenhouse gas emissions and the carbon footprint of the regulated industries.

Attitudinal behaviour improvement

Achieving awareness among the general public of the implications of climate change in Scotland is very much work in hand rather than a job well done.

SESA suggests that a programme of targeted and effective recycling schemes can significantly reduce the carbon emissions associated with material use, particularly through saving against the energy-intensive extraction of virgin materials.

Q3. Do you think that the programme of action will deliver the vision and objectives of the strategy?

Yes, provided our comments to question 2 are taken into account in formulating the Climate Change Plan.

Q4. Are you clear what SEPA hopes to achieve by implementing this Plan?

Whilst SEPA's vision and action programme sets out its intended aims to address climate change, clearly defined targets of greenhouse gas emission reduction would allow progress to be measured, and the plan to be implemented. Such targets should not only apply to SEPA's internal Environmental Policy but to the industrial sectors it seeks to regulate.

Q5. Are there other areas/actions you would like to see included in the Plan?

Where appropriate, SEPA's Plan ought to promote voluntary agreements over mandatory regulation as a means of mitigating the effects of climate change.

SESA's Members support and participated in the development, originally by Green Alliance, of a set of transparent environmental performance indicators for the waste management sector.

The development of a set of agreed indicators of environmental progress builds upon and improves current environmental reporting by providing:

- a consistent means of reporting environmental progress in key areas;
- a set of measurements readily understandable to operators to promote comparability of data across companies.

Q6. Are there areas/actions which you think should be excluded from SEPA's Plan?

No comment.

Q7. Do you have any comments on the proposed performance indicators?

SESA welcomes SEPA's proposals to measure change in carbon intensity of key sectors and we agree specific indicators would assist in the reporting of greenhouse gas emission reductions.

To measure and report on the progress of the waste management sector in mitigating the effects of climate change, SESA suggest a set of performance indicators should be agreed and established as part of our proposals for a Sector Plan. SESA suggests the following indicators as adopted by the Environment Agency's Sector Plan:

- Performance indicators to mitigate the effects of climate change:
- Total quantity of waste handled (tonnes)
- Annual emissions of CO₂ (equivalent) from landfill sites (passive venting, flare stacks and landfill engines)
- Annual emissions of CO₂ (equivalent) from energy from waste (EfW)
- Annual emissions of CO₂ (equivalent) from composting of waste
- Annual emissions of CO₂ (equivalent) from transportation of waste
- Annual emissions of CO₂ (equivalent) from energy use
- Total energy generated in megawatts (MW) per year by waste sector
- Performance indicators to reduce the consumption of raw materials by promoting the use of waste as a resource
- Total quantity of waste handled (tonnes)
- Total quantity of material recovered (tonnes)

Q8. Are there any areas where you consider SEPA currently performs well in terms of climate change?

No comment.

Q9. Are there areas where SEPA needs to improve its performance in relation climate change?

A general lack of data on wastes types and arisings and on likely future trends remains a major obstacle to effective implementation of SEPA's Climate Change Plan.

Despite substantial volumes of information being made available to SEPA and the Scottish Government, little practical use or analysis appears to be made, and little value appears to be added by the current data regime. It is essential that more effective data capture analysis and dissemination systems are developed and cost-effectively implemented-including the collection of data from waste producers and exempt activities. This would enable more effective management of waste and secondary resources and a more accurate compilation of databases to analyse climate change trends.

While the energy contained in various wastes has been recognised, we would welcome joint work by the Scottish Government and SEPA to identify and quantify the energy potential of various waste streams and to determine how this potential can best be realised.