

Avonbridge & Standburn Community Council

Chris Hynd
Committee Assistant
Public Petitions Committee
Scottish Parliament
Edinburgh, EH99 1SP

22nd September 2015

Dear Mr Hynd

Ref: Consideration of Petition PEI563 Sewage Sludge Practices in Scotland – Under Review.

With regard to the above Petition we note the Committee will consider this matter again on 6th October 2015. Please find below our response to written submissions from SEPA (PEI563A/D), Scottish Government (PEI563/B) and Scottish Water (PEI563C).

Comments on the SEPA Response

The Tables of Information supplied, refer to the UK as a whole and we cannot identify Scotland in isolation. However the figures show there has been an increase in the amount of sewage sludge produced from 2004-2013 and a larger percentage of that amount is being applied to agricultural land. This would appear to be in direct contrast to the majority of other EU countries who have reduced the disposal of sewage sludge on agricultural land, in some instances by almost 50% (e.g. France and Germany). The use of sewage sludge on farmland in Scotland has increased over the last 10 years by 100%.

It is known that many sludge producing/management facilities are operated by companies employed under a PFI arrangement. Please confirm if the information provided includes PFI production figures, as this is not clear.

With regard to complaints regarding sewage sludge the records show a dramatic increase in the number of complaints received over the last 4 years (2011-2015) i.e. from 54 to 160 per annum (no. of environmental complaints reported to SEPA).

The number of notifications recorded (i.e. individual complaints associated with an environmental event) has increased from 82 to 490 per annum, which is a considerable escalation.

Two sites in particular have attracted 350 complaints alone. Please request SEPA to confirm the identity of these sites and request that Scottish Water identify the operators/contractors involved.

Avonbridge & Standburn Community Council

Enforcement Action – the figures supplied demonstrate once again a 100% increase in final warning letters issued in the last year. It would appear more than a coincidence that the majority of enforcement action has been taken since the beginning of our campaign.

The Mobile Licensing system is quite obviously abused at present. During the multi-agency meeting of 17th March 2015, SEPA confirmed there can be multiple sites on one licence and SEPA cannot control these. This system should be suspended until such times as a robust framework is put in place and a strict management structure adhered to.

Odour control – This is a key issue which requires to be resolved as neither SEPA nor the Local Authorities have any control or apparent ownership in this area. The odour emanates after spreading and during stockpiling by which time it is too late for authorities to take action.

During the Petitions Committee Meeting on 23rd June 2015 the question was asked, “How many PFI operators and Private Contractors operate in the sector”? No information regarding this has been provided in the SEPA response.

Comments on the Scottish Water response

On 23rd June Committee Members raised questions regarding “fit-and-proper” testing in respect of contractors, the changing of company names and apparent malpractice. They also indicated that accountability is vital. We are aware of at least one instance where a company under contract has been substituted by another company in its entirety mid-contract, apparently unchallenged. Please request that Scottish Water provides documentary evidence to confirm necessary registration procedures and due diligence have been implemented in respect of all their current contractors.

On PEI563C dated June 2015 Scottish Water states

“Recycling sewage sludge to land is an important part of Scottish Water activity. Scottish Water’s Business Plan for 2015-21 highlights the risk of losing the ability to recycle to agricultural land and estimates the value of this risk at £50 million during the regulatory period. (*Scottish Water’s Business Plan for 2015-21*(Table 11, page 43):

https://www.scottishwater.co.uk/assets/about%20us/files/strategic%20projections/sw_businessplan201521march2014.pdf)

It is evident from this extract Scottish Water is solely addressing their Business Plan and not resolving the problem. Is it possible to receive a detailed explanation as to how these figures are arrived at? Is it an indication of the cost of processing the material by other means? If this is a funding issue Committee member Angus MacDonald MSP has established there may possibly be EU funding available to assist local initiatives. This requires further investigation.

Avonbridge & Standburn Community Council

The Scottish Government

With regard to the comments submitted by Gary Gray, Zero Waste Delivery Team please be aware we have only had one meeting to date with Scottish Government representatives, that being the multi agency meeting on 17th March 2015 in Stirling. During this meeting it was agreed further discussions should take place and a draft plan was to be available by the end of the summer. This would appear not to be the case, which is disappointing as we are keen to play an integral part in the review process.

In conclusion, the comments noted above are our main concerns. We would very much like to see a comprehensive restructuring of the regulatory framework for waste disposal and sewage treatment across Scotland, where the public as the major stakeholder are respected and protected. A single body needs to have overall responsibility for enforcement procedures and in this regard must be given the necessary legal authority to do so.

We trust the Petitions Committee finds these comments helpful and look forward to having further discussions with all the agencies involved.

Kind regards

Yours sincerely

For and on behalf of Avonbridge & Standburn Community Council and other concerned Community Councils in the Falkirk Area.

Doreen Goldie (Treasurer)

Jo Hirst (Convener)