

PE1563/L

Petitioner Letter of 1 March 2016

Petition PE01563 – Avonbridge and Standburn Community Council

Response to the [Scottish Government Sludge Review: Final Recommendations](#); Published 5th February 2016.

Executive Summary

The Scottish Government Review of the Storage and Spreading of Sewage Sludge on Land in Scotland (The Sludge Review): Final Recommendations is disappointing.

- It fails to consider a number of equally important factors, not just odour.
- It would appear no attempt has been made to seek a reduction in the practice of sewage sludge spreading.
- The Review has failed to consider ceasing the practice altogether or seek alternatives methods of disposal as adopted in other European countries.

Sludge Review: Key Recommendations

Spreading Practice - use of Sewage Sludge

- This recommendation is welcome. What would be the envisaged timescale?

Complaints & Reporting of Incidents

- We agree SEPA should be the lead agency however SEPA should have their powers vested in Statute. Will SEPA employees be increased in number and trained to cover all aspects of their additional responsibilities?

Regulation of Operators

- We agree entirely with this recommendation. Operators had the opportunity to self regulate and they failed.
- If Scottish Water does not carry out treatment of sewage sludge but by private organisations how are they policed to ensure that they meet the necessary standards and are competently trained in handling noxious materials?
- How will a “fit and proper person test” be defined?

Non-Agricultural Spreading

- This is a welcome recommendation. Will this eliminate the use of Mobile Plant Licences?

Power to Stop Problematic or Offensive Activity

- We agree with this recommendation but suggest SEPA’s powers be extended to also cover materials spread but not ploughed into soil.

Agricultural Land - On-Site Storage

- Is this recommendation achievable?
- Why is there an issue with quality should all sewage sludge not be produced to a uniform standard?

- Consideration should also be given to the proximity to watercourses.
- It would also be preferable to recommend sewage sludge be stored undercover.

More Frequent Monitoring Of Activity

- This opening statement is wrong. This is not a perception by stakeholders but a correct observation. The spreading of sewage sludge on land was not adequately monitored or regulated by the regulatory bodies prior to the issue being pursued by local communities. It is right and proper errant operators be charged to fund overheads incurred by regulatory bodies. We consider this recommendation long overdue.
- What consideration will be given to excessively large transport vehicles used to transport sewage sludge on A and B class roads which are dangerous to other road users and wholly unsuitable for the road conditions.

Sewage Sludge - Material Quality

- This recommendation is inadequate in that all sewage sludge produced should be of a uniform quality and of low odour. Existing guidelines already state sewage sludge should be dug into the soil immediately after spreading.
- When the correct procedures and processing have been adhered to all sewage sludge should comply.
- Should SEPA staff not already comply with the technical guidance for BAT and be consistent without exception?
- Who will carry out soil sampling and analysis so there is no conflict of interest or self-regulation by sewage sludge operators?

Implementation of Recommendations

- This is a welcome recommendation and we would very much like to be included in this process.

Additional Recommendations

Communication, Co-ordination and Information Management

- These recommendations are welcome but this guidance must extend to the PFI operators who constitute 88% of this industry.
- Is guidance in this instance sufficient? Operators in this industry should have clear contractual obligations to communicate with all links in the chain.
- All data collection would be welcome and is long overdue.

Improving Legislation

- All the above recommendations are welcome. However any lime treatment should be managed at source ie within treatment plants to avoid any land contamination issues and to ensure a consistent quality of product.

Planning Guidance

- We agree with this recommendation that all land restoration projects should achieve a uniform standard of restoration.
- Can planning guidance be introduced in respect of general waste lagoons which are currently unregulated?

Research

- The statement provided in respect of the Sniffer Report 2008 stating it found no proven health risks is incorrect. The body of the Report clearly notes the health risks are stated as being “moderate to low”.

Below is an extract from the Report clearly stating one of their conclusions.

²⁵ *We have therefore come to the conclusion that there are potential risks to human health that may arise from the treatment of fields with sewage sludge or from its run off but in many situations effects are poorly understood mechanistically. However, from the information currently available we are not in a position to quantify these risks. Sniffer Report 2008”*

- We suggest an independent study be commissioned to consider the full impact on human health, animal health and the short to long term environmental implications of using sewage sludge on all types of land including agricultural grazing land, land used for crop production, forestry and derelict land for reclamation.
- Consideration should be given to the findings of the Water Technology Engineering Ltd article in respect of Sewage Sludge, Humanure and Biosolids provided below.

http://www.wte-ltd.co.uk/sewage_sludge_biosolids.html

This article clearly highlights the dangers from sewage sludge (biosolids or humanure) fall into 3 main categories.

- Hormones and Synthetic Hormones
- Prion Contamination
- Toxin Contamination

This article contains reference to some of the most recent research carried out.

Further recommended reading

- http://www.netregs.org.uk/library_of_topics/waste/more_waste_materials_topics/lands_preading_sewage_sludge.aspx
- http://www.sniffer.org.uk/files/7713/4183/7997/UKLQ09_Task_1_Report_Final.pdf

Scottish Water: Further Actions

- Can confirmation be provided that all PFI operators will adopt the same stringent practices? This would achieve complete uniformity across the industry.

The Review Team approached the following stakeholders groups to seek their views on storage and use of sewage sludge on land:

Forestry Commission Scotland

Scottish Natural Heritage

local authorities

site operators

members of the public (particularly those located near restoration and agricultural sites)

farming and rural land interests including National Farmers Union of Scotland and Scottish Land and Estates

Health Protection Scotland

The Hutton Institute
Scottish Agricultural College

- Which members of the public have been consulted?
- Having spent a considerable amount of time on this issue we would appreciate the courtesy of an invitation to future meetings.
- Can a date be confirmed to hold an open public consultation on the Review?

Conclusion

We wish to thank the Review Team for their findings and recommendations.

However, the recommendations must be incorporated across the board without exception.

Will investment be made into upgrading all sewage treatment plants both private and public to a uniform standard?

Recognising that the recommendations will be beneficial in the short term, we are not convinced the practice of sewage sludge spreading on agricultural land is safe and in the long term Scotland should pursue alternative means of disposal.