

Submission from Scottish Water

Scottish Water Response to the Consultation on the Policy Statement on Zero Waste Regulations –

Scottish Water welcomes this opportunity to comment on the Policy Statement on Zero Waste Regulations.

Scottish Water is generally supportive of the changes and the pragmatic approach to refining the timetable to allow businesses and local authorities more time to plan and establish the necessary processes and collection systems that will be required. However we would not wish to see these deadlines extended further. It is critical that businesses are adequately informed as soon as practicable of the forthcoming regulations and timescales to ensure that no new investment is committed to inappropriate systems e.g. food waste disposal units, prior to the extended deadlines.

Scottish Water is also supportive of the intention to allow co-mingling of food and garden waste. We believe there are significant environmental benefits to be gained from this more flexible approach. Utilising both food waste and garden waste together in dry anaerobic digestion (AD) facilities will maximise the total renewable energy produced. Allowing co-mingled collection simplifies the introduction of food waste collection both for the householder and the local authority as well as reducing the overall carbon footprint of the collection service. No new collection vehicles or bins would be required and we believe that high food waste collection rates can be attained through this approach. Consequently it is our view that where co-mingled waste is destined for dry AD then co-mingled collections should be supported in the same way that food only collections are supported.

We welcome the ban on food waste macerators which promote the flushing of such waste to sewer. Whilst it is correct to highlight the benefit of ensuring such material is collected and treated to maximise its value, this will also help protect sewers from clogging. It has long been the position of the water industry that sewers are for sewage, and flushing other materials increases the risk to the environment by causing sewer chokes.

Regarding the landfill bans we also welcome the clarification that water treatment sludge and sewage works screenings will continue to be permitted to move direct to landfill with no pre-treatment.