

Delivering Scotland’s River Basin Management Plans: Silage, Slurry, and Anaerobic Digestate. Improving storage and application.
April 2021

Overview

General Comments

Detailed Response

Specific Comments

1	Do you agree with the proposed rules for the control of silage in bales or bulk bags?
<p>Yes, Scottish Water agrees with the proposed rules and would propose going further, we provide the following information for consideration. The public sewer network provides a pathway for pollutants to discharge into the environment. While foul drainage systems often connect to a biological treatment system, these are not designed to treat silage. The consultation document notes that silage “is at least 200 times stronger than untreated domestic sewage”. Therefore, the release of silage into drains which connect to the public sewer poses an additional risk to the environment in overwhelming the capability of Wastewater Treatment Works (WWTW) or Septic tanks. We would welcome the proposed rules going further by applying to any drain, not just surface water drains.</p> <p>We would welcome alignment of the proposed rules to control silage with the rules for storage of fertiliser (GBR18(a)(ii)). It is important that limits are placed on the proximity of silage storage locations to springs, wells and boreholes.</p>	
2	Do you agree with the proposed rules on the storage of silage?
<p>We consider that the proposal in Section 6.4 (g) should go further by applying to any drain, not just surface water drains.</p>	
3	Do you agree with the proposal to remove exemptions for silage stores built prior to 1 September 1991?
<p>We consider that the proposal in Section 6.4 (g) should go further by applying to any drain, not just surface water drains.</p>	

4	Do you agree with the proposed revisions to consolidate the storage requirements for slurry across Scotland at 22 weeks for housed cattle and 26 weeks for pigs?
Scottish Water has no comment.	
5	Do you agree with the proposal to remove exemptions for slurry stores built prior to 1 September 1991?
We consider that the proposal in Section 7.5 (j) should go further by applying to any drain, not just surface water drains.	
6	Do you agree with the proposed rules for slurry storage?
We consider that the proposal in Section 7.5 (j) should go further by applying to any drain, not just surface water drains.	
7	Do you agree with the proposed rules on the storage of liquid digestate?
We consider that the proposal in Section 8.2 (h) should go further by applying to any drain, not just surface water drains.	
8	Do you agree with the proposed revised requirements for the notification of new silage, slurry, and liquid digestate structures?
Yes, we agree with the proposed revised requirements. The operator should also notify other relevant agencies depending on local infrastructure, e.g. Scottish Water where installations will be in the vicinity of the public drinking water supply, public sewerage system, or connections made to these.	
9	Do you agree with the proposal that a RAMS map should be prepared and issued, to those carrying out organic fertiliser spreading operations?
Scottish Water agrees with the proposal and consider that the risk assessment should also include risk of release into water supplies and drains.	
We would like to take this opportunity to comment on other aspects of GBR18. In January 2020, SEPA published a revised Technical Guidance Note for authorising the storage and use of sewage sludge. This guidance explains that where sludge storage is authorised under a WML Paragraph 8 exemption, the requirements of GBR18 do not apply. In the interests of clarity and transparency, Scottish Water would welcome an amendment to GBR18 that mirrors this position.	
10	Do you agree with proposals for the application of slurry, and liquid digestate, by precision equipment?
Scottish Water has no comment.	
11	Do you agree with the proposed amendments to GBRs 5, 6, 8, and 14?
Scottish Water has no comment.	

12	Do you agree with the proposed amendment to GBR 9?
Scottish Water has no comment.	
13	Do you agree with the proposed amendments to GBR 10?
<p>We would welcome more clarity on the excluded activities covered under GBR10b. In particular, we note that there is no threshold for industrial estates, unlike the other excluded activities. Therefore, we would welcome further discussion to understand whether it is appropriate for all industrial estates to require a licence to authorise surface water drainage discharges.</p> <p>We would also welcome further discussion with SEPA regarding the need to retrospectively apply for authorisations for post-2007 activities that are not covered by GBR10b.</p> <p>We note that there are no changes proposed to GBR 11. It is important the proposed changes to GBR10 are extended to include measures aimed at increasing awareness of site operators, owners and occupiers of their responsibilities under GBR11 to prevent pollution into surface water drainage systems.</p> <p>It is Scottish Water policy to remove and minimise surface water from combined and foul sewer systems. Currently, GBR10e stipulates the discharge from surface water systems must not contain any run-off from specified high risk areas and GBR11 stipulates that polluted surface water must not be discharged into a surface water drainage system. Consequently, this will be discharged into the combined/foul sewer system. There may be opportunities to separate uncontaminated surface water thereby reducing the volume/flow of surface water being discharged to the sewer system. We would welcome inclusions of conditions in GBR10 and/or 11 that support our surface water policy and require site owners/occupiers to separate and remove uncontaminated surface water from high-risk areas to minimise surface water discharges into sewer systems.</p>	
14	Do you agree with the proposed amendments to GBR 15?
Scottish Water has no comment.	
15	Do you agree with the proposed amendments to GBR 22?
Scottish Water has no comment.	
16	Do you agree with the proposed amendments to GBR 25?
Scottish Water has no comment.	



17	Do you agree with the proposed amendments to GBRs 27 and 28?
Scottish Water has no comment on proposed amendments to GBR 27 and GBR28	

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