



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Susan Scott  
Scottish Government  
SEPA Sponsorship and Pollution Team  
Victoria Quay  
Area 1-J (N)  
Edinburgh  
EH6 6QQ

20 May 2010

Dear Ms Scott

**Consultation Response - SEPA proposal to amend charges for the spreading of organic waste on land**

I am writing to present the LARAC response to the above Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of 90% of the 440 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC supports the proposals to reduce charges for the registration of farms for the spreading of organic waste. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on (phone) or (email).

Yours faithfully,

Ms Liz Drew  
LARAC Policy Team



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## **Consultation Response – SEPA proposal to amend charges for the spreading of organic waste on land**

Overall, LARAC supports the recommended charging options detailed in Annex 1 and Annex 2 of the consultation document. The SEPA proposal to rationalize and simplify the regulatory approach to these waste exemptions by removing the 50 hectare restriction and allowing all organic spreading activities taking place on one farm, to be registered as one, may provide a potential financial incentive and subsequent stimulus to the use of recycled organic matter on land.

### **General Comments**

Landfilling biodegradable waste is not environmentally sustainable, and is a significant contributor to climate change. In response to environmental and legislative drivers, the waste industry is increasingly managing wastes by alternative methods. These include the composting and anaerobic digestion of source separated organic wastes such as food, garden and parks wastes, and the bio-stabilisation of mixed wastes through Mechanical-Biological treatment processing (MBT).

LARAC believes that waste derived products including compost and anaerobic digestate can benefit agriculture, the environment and the economy by improving the organic matter content in soils, reducing the need for artificial fertilizers, and sequestering carbon in the soil. As such, LARAC supports the activity of spreading waste on land where:

- Spreading is seen as a recycling activity and not disposal
- Spreading meets all legislative and minimum standard requirements that are necessary to protect the environment, animal and plant health
- Spreading is conducted in a manner that is beneficial to agriculture and ecological improvement, and is matched to the needs of planned crop rotation