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Joint SSE/Scotia Gas Networks Response to the Consultation on the Draft Business and Regulatory Impact Assessment on the Regulations to Deliver Zero Waste

Dear Sir/Madam

SSE and Scotia Gas Networks welcome the opportunity to respond to this consultation.

SSE, formerly Scottish and Southern Energy, is one of the largest utilities in the UK employing over 20,000 staff and is Scotland's largest privately owned company. It is the largest generator of renewable electricity and the second largest supplier of electricity and gas with over 10 million customers.

Scotia Gas Networks (SGN), half owned by SSE, is the UK's 2nd largest gas distribution company providing a safe and secure supply of natural gas to 5.7 million customers through 74,000km of gas mains and services. SGN operates 2 gas distribution networks and one of these covers the whole of Scotland (Scotland Gas Networks).

Please see annex 1 for our thoughts on the business and regulatory impact assessment and annex 2 for our 'Respondent Information Form'.

Yours faithfully,

Richard Lowes

Public Affairs and Policy Manager-Scotia Gas Networks

Considerations for the Draft Regulatory Impact Assessment

SSE and SGN are keen supporters of Scotland's aim to become a zero waste economy and as such we broadly support the aims of these regulations. We believe that the Scottish Government's response to the consultation is generally considered and appropriate. However, the Scottish Government should not lose its focus on leading Scotland to become a zero waste economy and the Government should be careful not to weaken its proposals.

Having considered the proposals, overall, we believe that the Government should accept that the regulations and policy for zero waste will need to be continually developed and this consultation process cannot be seen as the last step in creating a zero waste Scotland. Admittedly however, the Government does need to carefully balance this continual policy development with the fixed long term targets that are required to create investor certainty in waste infrastructure.

We accept that the proposals outlined in the business and regulatory impact assessment under 'Option 3', which suggest increasing lead-in times for certain aspects of the policy, offer a pragmatic approach to implement the plans. This means that in practice, businesses and industry in Scotland will be able to make more informed and considered waste management decisions but as you suggest, the environmental impacts are unlikely to vary significantly from 'Option 2'.

SSE and SGN believe that the proposal to ban food waste macerators in commercial settings is justified and sensible. These products potentially provide a route for food waste which is a poor waste management option and they can also cause increased strain on the sewerage system. However, we are now seeing the emergence of domestic scale food waste macerators which could divert domestic food waste away from the best treatment options. Potentially, the Scottish government may need to regulate macerators in the domestic market. This is an example where the regulations may require ongoing development.

Also, in relation to domestic food waste collections, the Scottish Government should consider that although the current proposals for regulation require anything larger than an 'accessible small town' to have food waste collections, as technologies and processes develop, food waste collections may become appropriate for smaller settlements. There may also be opportunities for combining commercial and domestic bio/food waste collections in areas where the collection of domestic food waste is not mandated. This is another aspect of the policy where ongoing monitoring may be required.

Overall, both SSE and SGN are supportive of these regulations and associated policy changes and we look forward to helping Scotland meet its waste ambitions. Please feel free to contact us if you wish to follow up any of the points we have made.

ZERO WASTE REGULATIONS - BRIA

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your comments to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

SSE/Scotia Gas Networks

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

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3. Permissions - I am responding as...

Individual / Group/Organisation
Please tick as appropriate

(a)	Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)? Please tick as appropriate <input type="checkbox"/> Yes <input type="checkbox"/> No	(c)	The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site). Are you content for your response to be made available? Please tick as appropriate <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(b)	Where confidentiality is not requested, we will make your responses available to the public on the following basis Please tick ONE of the following boxes		
	Yes, make my response, name and address all available <input type="checkbox"/>		
	or		
	Yes, make my response available, but not my name and address <input type="checkbox"/>		
	or		
	Yes, make my response and name available, but not my address <input type="checkbox"/>		
(d)	We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? Please tick as appropriate <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		