

Response ID ANON-EA2U-RNAB-G

Submitted to Environmental Authorisations (Scotland) Regulations 2018: Proposed changes to the Charging Scheme
Submitted on 2024-10-11 12:02:33

1. About you

1 What is your name? (optional)

Name:

Jenny Grant

2 What is your email address? (optional)

Email address:

jenny@r-e-a.net

3 If you have supplied an email address, are you happy to receive communication from SEPA about ongoing developments in the Better Environmental Regulation Programme?

Yes

4 Are you responding to this consultation on behalf of yourself, or a business or organisation?

Organisation

If you are responding on behalf of a business or organisation, please provide the name below::

REA - the Association for Renewable Energy and Clean Technology

5 Are you happy for us to publish your response to this consultation?

Yes

2. Changes to the charging scheme

2.1. How have the charges been calculated

2.2. Changes to existing water activity charges

6 Do you agree with the charging proposals in 'Table 2: Charging changes to existing water activities'?

Not Answered

If you answered 'No', please explain your answer below::

2.3. Changes to existing industrial activity charges

7 Do you agree with the charging proposals in 'Table 3: Charging changes to existing industrial activities'?

Not Answered

If you answered 'No', please explain your answer below::

8 Do you agree with the proposal to introduce application charges for the activity currently described as PPC A: the operation by a third party of an activity described under Part B of Schedule 1 of the PPC regulations as part of a Part A installation, Regulation 12(1). (Reference 10190)?

Not Answered

If you answered 'No', please explain your answer below::

9 Do you agree with the proposal to introduce application charges for the activity currently described as PPC A: The operation by a third party of part of a Part A activity installation (reference 10200)?

Not Answered

If you answered 'No', please explain your answer below::

10 Do you agree with the proposal to introduce application charges for the activity currently described as PPC A: Directly Associated Activities (operated by a third party) (reference 10170 and 10180 (low-risk activities))?

Not Answered

If you answered 'No', please explain your answer below::

11 Do you agree with the proposal to increase application charges for the activity currently described as PPC B 1.1: Combustion of any fuel where thermal input is greater than or equal to 20 megawatts but less than 50 megawatts (reference 10450) in line with the application charge for medium combustion plant subject to a bespoke permit (1-20MW) (reference 10460)?

Not Answered

If you answered 'No', please explain your answer below::

2.4. Changes to existing waste management activity charges

12 Do you agree with the charging proposals in 'Table 4: Charging changes to existing waste activities'?

Yes

If you answered 'No', please explain your answer below::

Broadly we agree with the proposed charges. Members have raised questions regarding paragraph 7 / the use of waste on land for the purpose of soil improvement.

For the applications less than or equal to 1500 hectares - will the applications be time limited? i.e. can farms be added after the application or if the full landbank must be in place when the application is submitted? Will it be possible to add and remove different farms whilst the registration is in place as long as the total area covered does not exceed the band?

The timing of introduction of the new system is important as operators may hold existing exemptions and renewals that expire at different times so it is essential that this is taken into account during implementation. For example, if the new system is introduced in January and an exemption was renewed in Oct - the operator will have already paid for 9 months they haven't 'used'.

13 Do you agree with the charging proposals for mobile plant activities that are highlighted in section 2.4.4?

Yes

If you answered 'No', please explain your answer below::

2.5. New charging activities

14 Do you agree with the charging proposals in 'Table 1: New charging activities'?

Yes

If you answered 'No', please explain your answer below::

2.6. Changes to charging activity descriptions only

15 Do you agree with the charging activity descriptions in 'Table 5: Changes to charging activity descriptions only'?

Yes

If you answered 'No', please explain your answer below::

2.8. Additional comments on changes to the Charging Scheme

16 If you have any additional feedback on Section 2, Changes to the charging scheme: please comment here.

Additional comments on Section 2, changes to the charging scheme.:

3.1. Imposition, escalation and de-escalation of an authorisation

17 Do you agree with the proposal to charge for the imposition and escalation of an authorisation?

No

If you answered 'No', please explain your answer below::

Our preference would be for an informative, education led approach in the first instance with operators given the right information and guidance to apply for the correct level of authorisation. If operators do not comply without justification, then it might be reasonable to apply additional fees.

3.2. New applications for multi-activity authorisations

18 Do you think SEPA should introduce a Corporate Permit?

Yes

If you have any additional feedback, please leave your comments here::

3.3. Consolidation of existing authorisations

19 For scenario 1, do you agree with the proposal to charge the equivalent of a standard variation charge for an application to consolidate an authorisation?

Yes

If you answered 'No', please explain your answer below::

We think the proposed charge is reasonable but the need or not for consolidation should be proposed by or agreed with the operator and not a change initiated by SEPA, unless there is sound justification for this.

20 For scenario 2, do you agree with the proposal to charge the equivalent of a standard variation charge per activity for an application to consolidate an authorisation?

Yes

If you answered 'No', please explain your answer below::

We think the proposed charge is reasonable but the need or not for consolidation should be proposed by or agreed with the operator and not a change initiated by SEPA, unless there is sound justification for this.

3.7. Application to transfer an authorisation

21 Do you agree with the charging proposals for an application to transfer an authorisation?

Yes

If you answered 'No', please explain your answer below::

3.8. Application to transfer a revocation notice

22 Do you agree with the proposal to charge for the transfer of a revocation notice?

Yes

If you answered 'No', please explain your answer below::

3.9. Determining Commercial Confidentiality of information submitted to SEPA

23 Do you agree with the proposal to charge for determining commercial confidentiality in relation to information and regulatory notices?

Yes

If you answered 'No', please explain your answer below::