

Public Review of BSI PAS 510 - Plastic pellets, flakes and powders - Handling and management throughout the supply chain to prevent their leakage to the environment – Specification
March 2021

Overview

General Comments

Detailed Response

Specific Comments
<p>Scottish Water recommends that, to protect the environment from plastic pellets, it is essential to define the drainage system to include both surface water sewer and foul sewer.</p> <p>Plastic Pellets should not be able to flow into the foul drainage system as this is not designed to separate and remove plastic pellets. Scottish Water would consider any release of plastic pellets to public sewers as a breach of the Sewerage (Scotland) Act 1968. If plastic pellets are inappropriately released into the foul drainage system they may then be discharged through outfalls, and if present may compromise recycling of biosolids.</p> <p>Scottish Water strongly supports references made in the draft document to protecting surface water drainage systems from plastic pellets.</p>

1	<p>Page 4 para 3 - Contractual and legal considerations - List of topics</p>
<p>Scottish Water suggests the inclusion of - "<i>Discharges into public sewerage systems</i>" - as a regulation topic</p>	
2	<p>Page 8 – Terms, definitions, and abbreviations – 3.1.10 Loss</p>
<p>Scottish Water recommends the inclusion of the phrase - "<i>down a drain</i>" - in the example given. However, the document does not include a definition of "environment" and what this includes/excludes. It is important that drains and sewers are considered as potential pathways to the environment. Sewerage infrastructure includes sewers, pumping stations, outfalls, overflows, sewage</p>	

treatment and biosolids treatment. These provide several pathways to water and land environments.	
3	Page 9 – Terms, definitions, and abbreviations – 3.1.17 Physical Boundaries
Scottish Water recommends the inclusion of the phrase - <i>"point at which surface water drains and sewers discharge into the public sewer"</i> - within the definition of physical boundaries. It should also be noted that open and culverted watercourses and Sustainable Urban Drainage Systems (SUDS) may also be within physical boundaries.	
4	Page 10 – Terms, definitions, and abbreviations – 3.1.20 Storm Drain
Scottish Water suggests this definition be extended to include – <i>"property drainage and roads drainage systems"</i>	
5	Page 10 – Terms, definitions, and abbreviations – 3.1.21 Sewer
It is important that drains and sewers situated outwith physical boundaries are considered part of the environment, or pathways to the environment.	
Sewerage infrastructure includes sewers, pumping stations, outfalls, overflows, sewage treatment and biosolids treatment and recycling. These provide a number of pathways to water and land environments. If drains and sewers are not be considered part of the environment for these standards, Scottish Water suggests it would be helpful to extend the proposed responsibilities outlined in Sections 4 to 11 so that the responsibilities apply to the environment, drains, sewers and pathways to the environment.	
6	Page 14 – Leadership and Commitment – 5.3 Pellet loss prevention performance objectives – Note 2 Performance Objectives
Scottish Water welcomes the inclusion of the phrase "quality of effluent discharge" in the examples of performance objectives provided. However, we suggest it is also important to include the – <i>"quality of any surface water discharges"</i> - as part of performance objectives.	
7	Page 14 – Competence, Training and Awareness – 6.2 Training
Scottish Water suggests it would be helpful to expand this paragraph on training to include – <i>"the identification of internal drainage systems; installing, maintaining and monitoring containment systems; and monitoring their effectiveness at preventing losses into the drainage system."</i>	
8	Page 14 – Competence, Training and Awareness – 6.3 Awareness
As above, Scottish Water suggests it would be helpful to expand the paragraph on awareness to include – <i>"the identification of internal drainage</i>	

<i>systems; installing, maintaining and monitoring containment systems; and monitoring their effectiveness at preventing losses into the drainage system.”</i>	
9	Page 16 – Risk Assessment of Pellet Loss - 7 (e) Foreseeable emergency situations, such as heavy rain and flooding
Scottish Water recommends that the section on risk assessment is extended to include - <i>“all foreseeable situations such as wind and normal weather conditions” ie not just emergency situations.</i>	
10	Page 16 – Risk Assessment of Pellet Loss - 7.2.1 pathways to local environment and watercourses
Scottish Water suggests it would be helpful to expand this point on the list to include – <i>“all drainage systems ie surface water drains, foul drains, combined drains, roads and property drains.”</i>	



- End of Document -