

**Environmental Authorisations (Scotland)
Regulations 2018: Proposed Standard Conditions
for Registration Level Activities**



**Scottish
Water**
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<p>1.1(a)</p>	<p>Do you agree with the list of core standard conditions for waste activities for:</p> <ul style="list-style-type: none"> • Management systems? Yes or No. • Waste acceptance? Yes or No. • Site security? Yes or No. • Waste storage? Yes or No. • Pollution control? Yes or No. • Environmental event reporting? Yes or No. • Recording and reporting? Yes or No. <p>If you answered 'No' to any of the above, please explain your answer, referencing the standard condition you are commenting on.</p>
<p><u>Management Systems</u> - No</p> <p>Scottish Water broadly supports having a core standard condition in Registrations for a written management system, provided it is proportionate to the complexity and risk of the authorised activities. We would welcome further discussion with SEPA to understand the scope in relation to the registration-level activities carried out at our assets.</p> <p>The draft guidance for waste storage/treatment activities sets out proposed requirements for the written management system and states that '<i>some measures may not be suitable or relevant to a specific operation and will depend on the activities being carried out, the size and nature of the activities and/or the location of the site</i>'. Examples of this appear to include some of the management plans which are listed with the caveat '<i>if required</i>' e.g. odour, noise and vibration, dust, mud, litter and pest. Scottish Water would like to understand more about how, and when, the suitability or relevance of a measure will be determined e.g. what evidence is expected to justify the exclusion of a measure from the management system and does this need to be agreed with SEPA in advance of an application being made and/or a registration being issued.</p> <p>Many of the management system measures that are set out in the draft guidance cover generic business processes and are not site specific. Scottish Water would, therefore, like to understand if there is an option for having a single, corporate written management system with any site-specific information provided as annexes to this document, or in separate documents (similar to the current Working Plan format).</p> <p><u>Waste Acceptance</u> - No</p> <p>Scottish Water supports the need for standard waste acceptance conditions, provided they are sufficiently broad/flexible to cover different waste types (e.g. solid vs liquid), different operating practices (e.g. open vs closed systems) and differing responsibilities (e.g. Registration responsible person vs owner/occupier of Authorised Place). More detailed feedback is provided in the responses to the registration-specific questions.</p>	

Site Security – No

Where the Authorised Place is fully controlled by the Responsible Person, Scottish Water agrees it is appropriate to have a standard condition for site security and for the written management system to set out how this will be achieved. However, where the Authorised Place is not controlled by the Responsible Person e.g. land on which waste is to be stored and applied, then the owner/occupier of that place is responsible for preventing unauthorised access to the waste. It would not, therefore, be appropriate for the holder of the Registration to be responsible for compliance related to site security.

Waste Storage - No

Scottish Water agrees that where waste is stored in operational sites, the storage areas should be clearly labelled to identify the type of waste. Further clarity is required on the labelling requirements for material stored in field stockpiles, particularly when details of biosolid spreading locations are not made publicly available for confidentiality and commercial sensitivity reasons.

Pollution Control - No

At WwTW, odour and noise will arise from the normal operation of the treatment processes. It may, therefore, be difficult to determine how much, if any, odour and/or noise at the boundary of the Authorised Place is due to the regulated waste activity.

Environmental Event Reporting - Yes

Scottish Water agrees with the proposed standard conditions for environmental event reporting.

Any guidance would benefit from a definition for 'environment' to confirm that this includes the atmospheric and terrestrial environments as well as the aquatic environment.

Recording and Reporting - No

Scottish Water will hold many Registrations (50+) and collating data for all of these for a single submission by 28 January of the following year will be challenging.

Due to the holiday period at that time of year, the deadline effectively leaves only 3 to 3.5 weeks to process the data and obtain the necessary approvals for a submission of the full annual data set. Even if data has been collected on an ongoing basis throughout the year, this may be difficult to achieve, particularly as our data often comes from third party contractors and can take more time to obtain, review and accept.

Currently, data returns are due quarterly, with 28 days allowed to gather the previous three months of data. It is not clear why operators will now only have 28 days (less in practice) to process one year of data, instead of 28 days to process three months of data.

Additionally, we may find that any annual reporting requirements for waste permits have similar deadlines, which will increase the amount of data to be collected and submitted at that time of year.

<p>If the data return is to change from quarterly to annually, Scottish Water would prefer the submission date to be end of February at the earliest. This should allow sufficient time for collection of the previous year's data and should spread out the large number of reporting tasks.</p>	
<p>1.2.2.1(a)</p>	<p>Do you agree with the list of standard conditions for Transporting Waste? Yes or No</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.3.1(a)</p>	<p>Do you agree with the list of standard conditions for Acting as a broker or dealer of waste? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.4.1(a)</p>	<p>Do you agree with the list of standard conditions for the Storage of asbestos waste in a single sealed container not greater than 40 cubic metres? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>Scottish Water has a couple of waste management licences (WMLs) that could be replaced with the proposed Registration for storage of asbestos. These WMLs allow storage of contaminated protective clothing. One of the WMLs lists this waste type under EWC code 15 02 02.</p> <p>Scottish Water would welcome the addition of this waste type to the list of authorised wastes in Table 1 of the consultation. However, we would note that it might be difficult to measure the quantities of this type of waste as it would probably be discarded in the double bag with the asbestos waste and not wrapped separately.</p>	
<p>1.2.5.1(a)</p>	<p>Do you agree with the list of standard conditions for the storage of less than, or equal to, 2,500 tonnes of waste per year for recovery, except for activities within the scope of the Code of Practice on sampling and reporting at materials facilities? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>See response to Qu. 1.2.5.1(e).</p>	
<p>1.2.5.1 (b)</p>	<p>Are there any waste types, not currently included, that you believe should be included in this Registration?</p>
<p>No</p>	

1.2.5.1(c)	Are there any waste types, currently included, that you believe should be excluded from this Registration?
No	
1.2.5.1(d)	Do you agree that, due to the risks associated with them, the storage of lithium-ion batteries should be excluded from this Registration?
If lithium-ion batteries are excluded from this Registration, it is not clear how they would be authorised.	
1.2.5.1(e)	Do you agree with the storage time and volume limits contained in this Registration?
No	
<p>There appears to be some inconsistencies between this Registration and the General Binding Rule (GBR) for temporary storage of waste at a place owned/occupied by the producer.</p> <p>A site operating under the GBR can store a liquid waste for a year and a site operating under the Registration can store the same volume of liquid for only six months (Table 4).</p> <p>The GBR requirements for secondary containment are more detailed than those specified in the Registration standard conditions.</p>	
1.2.6.1(a)	<p>Do you agree with the list of standard conditions for the storage of less than, or equal to, 10 waste motor vehicles at any one time? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.6.1(b)	<p>Do you agree with the conditions relating to storage of electric and hybrid motor vehicles? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.7.1(a)	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 5 waste motor vehicles at any one time (not including waste electric or hybrid vehicles)? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.8.1(a)	Do you agree with the list of standard conditions for the "Storage and treatment of less than, or equal to, 25m ³ of waste cooking oil at any one time to manufacture biodiesel"? Yes or No.

	If you answered 'No', please explain your answer.
N/A	
1.2.9.1(a)	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 100,000m³ of waste in a 12-month period within the boundary of a water treatment works or a wastewater treatment works (including the sludge treatment facility)? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p><u>Title of Registration</u> Scottish Water would welcome the addition of 'imported' in the title of this Registration to make it clear that the scope is limited to waste that is brought to the Authorised Place and not generated on site i.e. Storage and treatment of less than, or equal to, 100,000m³ of IMPORTED waste in a 12month period etc...</p> <p><u>Condition 2 – Table 1</u> The list of authorised wastes in Table 4 includes an entry for EWC code 20 03 99 with the description: "<i>Cesspool waste and other sewage sludge only</i>". Scottish Water notes that in the UK's waste management guidance (WM3), this EWC code is described as "Municipal wastes not otherwise specified". We note that the draft EASR¹ amendment defined municipal waste as not including '<i>septic tanks and sewage network and treatment, including sewage sludge</i>'. We also understand that cesspools/cesspits are illegal in Scotland and so, we would welcome re-consideration of the description for this code.</p> <p><small>1 Environmental Authorisations (Scotland) Regulations</small></p> <p><u>Condition 3 – Waste Inspections</u> Where liquid wastes are imported to wastewater treatment works (WwTW), the materials are transported in tankers and often discharged via enclosed pipework. It is not possible to visually inspect wastes that are brought to site in this way i.e. enclosed system comprising tankers/hoses/pipework/reception tank. Instead of visually checking each load on arrival, most tankers are required to discharge via loggers which measure the density of wastes.</p> <p>There is also a wider 'closed system' to consider. These wastes are usually transported in Scottish Water vehicles from Scottish Water assets or private domestic septic tanks. Where third-party vehicles are used, Scottish Water has either instructed a company to pick up specific wastes from specific locations on its behalf or approved a company's importing activities. Therefore, the waste origin and waste type are known before being accepted into the WwTW.</p> <p>Scottish Water would welcome flexibility in the core standard conditions for pre-acceptance and acceptance activities to allow visual inspections to be augmented, or replaced, with other monitoring options.</p> <p><u>Condition 4 – Unauthorised Waste / Quarantining</u></p>	

Most waste that is imported to a WwTW is liquid and brought to site in tankers. If it is identified as unauthorised before being discharged into the works, then the tanker will be refused permission. However, if the waste is identified as unauthorised after the tanker has been emptied, it will be impossible to retrieve the waste from the WwTW process to store it separately/quarantine it from other waste and it will not be possible to store it on an impermeable surface; this standard condition can only be applied to solid wastes.

Condition 8 – Secondary Containment

The proposal is to require all liquid waste to be stored in containers within a secondary containment system. Further clarity is required on the scope of this requirement because the Interpretation of Terms defines liquid as *‘any aqueous material but excluding sludge’*. In addition, ‘liquid waste’ is defined as *‘any waste in liquid form including waste waters but excluding sludge’*. Most of the wastes that will be authorised by this registration are described as ‘sludges’ in Table 1.

It will be challenging for Scottish Water to comply with the requirement for secondary containment.

Liquid waste from tankers will discharge directly into tanks/structures that are part of the wastewater treatment process (which will not be authorised by the registration). These structures already contain sewage/sludge and will have been designed using the appropriate specifications for liquid retaining structures e.g. BS EN 1992-3 Liquid retaining and containment structures (previously BS 8007). They will likely not have sufficient, or any, secondary containment to meet the required capacities set out in the proposed standard conditions. Retrofitting such containment would require significant investment and may not be physically possible at some sites.

Scottish Water would welcome flexibility in the standard conditions to address the risk of spills/leaks in an alternative way e.g. inclusion in the written management system of monitoring, maintenance and emergency response measures that mitigate risks and impacts, as well as investigation and implementation of corrective actions if a spill/leak event was to occur.

Condition 9 – Nuisance

The standard conditions stipulate that odours, noise, dust and litter must not be emitted beyond the boundary of the Authorised Place. Where the regulated activity is taking place within a WwTW or sludge treatment centre (STC), it might be difficult to determine how much, if any, of any offending odour and noise is due to the regulated waste activity. Odour and noise will be generated from the normal operation of the WwTW and STC.

Condition 19 – Annual Reporting

Note the response to Qu.1.1(a)

Scope

This registration will authorise ‘storage and treatment’ of waste at a WwTW or WTW. The consultation proposes to limit treatment to *‘physical processes such as separation, thickening, dewatering and blending’*, excluding *‘anaerobic digestion or thermal treatment’*.

Scottish Water would welcome a more generic description of treatment that aligns with the General Binding Rule for temporary storage of waste at the place of production.

<p>For example: Treatment is limited to facilitating storage and onward transport of the waste for further treatment, recovery or disposal. Treatment excludes anaerobic digestion and advanced thermal conversion technologies. Scottish Water would welcome inclusion of lime treatment.</p>	
<p>1.2.10.1(a)</p>	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 20,000 tonnes of inert and excavation waste at any one time for the manufacture of construction aggregates? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Scottish Water welcomes the inclusion of sewage grit (19 08 02) in the list of authorised wastes as this should facilitate a recovery outlet for this material that will align with Scotland's circular economy and net zero goals.</p> <p>The description of this waste states that it is '<i>washed</i>' and '<i>free from sewage contamination</i>'. We would welcome further discussion with SEPA on the criteria that will be used to demonstrate compliance with this description.</p>	
<p>1.2.11.1(a)</p>	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 10,000 tonnes of metal waste for recovery at any one time? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.12.1(a)</p>	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 1,000 tonnes of wood waste for recovery at any one time? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.13.1(a)</p>	<p>Do you agree with the list of standard conditions for the storage and treatment of less than, or equal to, 500 tonnes of segregated non-hazardous waste for recycling at any one time, except for activities to which the Code of Practice on Sampling and Reporting at Materials Facilities applies? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.13.1(b)</p>	<p>Are there any other non-hazardous waste types you think should be excluded from this Registration?</p> <p>If yes, please specify which ones, and why.</p>
<p>Yes</p>	

1.2.14.1(a)	<p>Do you agree with the list of standard conditions for the Storage and preparation for reuse of waste (not including WEEE)? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
1.2.15.1(a)	<p>Do you agree with the list of standard conditions for the storage and treatment of less than, or equal to, 35 tonnes of waste electronic and electrical equipment at any one time by repairing, refurbishing, or dismantling it for the purpose of:</p> <p>(a) reusing the WEEE for its original purpose; (b) reusing any dismantled components for their original purpose; or (c) manually dismantling WEEE for the purpose of recovery elsewhere?</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.16.1(a)	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 500 tonnes of biowaste for composting in open systems at any one time, with a capacity of equal to or less than 75 tonnes a day? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.17.1(a)	<p>Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 500 tonnes of biowaste for composting in an enclosed system at any one time, with a capacity of equal to or less than 75 tonnes a day? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.18.1(a)	<p>Do you agree with the list of standard conditions for the Anaerobic digestion of less than, or equal to, 100 tonnes of biowaste per day? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
No	
<p><u>Table 1</u> Scottish Water notes that the list of authorised biowastes in Table 1 includes '<i>19 02 06 Sewage sludge which has previously been pasteurised and stabilised only</i>'. Whilst we welcome the opportunity this authorisation might provide to co-treat sewage sludge with other wastes, further clarity is needed on why sewage sludge must be treated before it can be accepted at a site.</p>	

We also do not recognise the use of this EWC code for sewage sludge. In the WM3 waste guidance, the description for 19 02 06 is 'sludges from physico/chemical treatment (not containing hazardous substances)'. The EWC code used for sewage sludge is 19 08 05.

We also note that this Registration is for the anaerobic digestion of biowaste and the definition of 'biowaste' in the Interpretation of Terms section of the consultation does not cover sewage sludge i.e. it only covers garden/park wastes, food/kitchen wastes. This also applies to some other wastes listed in Table 1 e.g. 02 01 06 Animal faeces, urine and manure (including spoiled straw).

Environmental Event

There is a requirement to record activation of the flare as an environmental event. The reason for this is not clear in the consultation. If a flare is operating correctly, there should be no impact on the environment. Also, on sites with only one CHP, any downtime could result in the flare being activated several times a day and notifying and reporting each event could be impractical. More guidance is required on the expectations of this reporting requirement in practice.

1.2.19.1(a)	<p>Do you agree with the list of standard conditions for the Use of waste on land for the purpose of soil improvement (single farm/site)? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
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No

Scottish Water recognises that these Standard Conditions are for a Registration-level authorisation to use waste on a single site and that, due to the scale of our operations, it is likely we will need to be authorised by a permit instead to cover multiple sites. As we anticipate that many of the conditions in both the Registration and a Permit will be the same, or similar, we would like to take this opportunity to provide our feedback.

Condition 1 – Written Management System

Scottish Water notes that the scope of any management system will be limited to activities that are within the control of the Responsible Person. The Responsible Person cannot be held liable for the actions of the land owner/occupier.

Scottish Water would welcome SEPA's view on basing our management system on the Biosolids Assurance Scheme (BAS) standard which is audited by an independent third-party certification body with UKAS accreditation.

Condition 2 – Table 1

Table 1 refers to agricultural and non-agricultural land use and these terms are not included in the Interpretation of Terms section of the consultation. Definitions were also not included in the proposed EASR amendment.

Scottish Water notes that one of the recommendations of the Scottish Government's Sludge Review in 2016 was to review land type definitions and we would welcome further guidance on the terms 'agricultural' and non-agricultural'.

Also, instead of using 'any' land use in Table 1, it might be more appropriate to use '*agricultural and/or non-agricultural*' to avoid wastes being used on other land types.

Condition 3 – Conventional & Enhanced Treatment

Scottish Water notes that the definitions of conventionally and enhanced treated sludges include maximum allowable concentrations (MAC) for E.Coli, in addition to log reductions. The Scottish Government recognised this was an important change to make in its analysis of the EASR consultation earlier this year.

Scottish Water welcomes the inclusion of an end product standard to align with the requirements of the Biosolids Assurance Scheme. However, if there is not a sufficiently high level of E.Coli in the raw sludge, it is not always possible to achieve the required log reduction in enhanced treated sludge. We would, therefore, welcome amending its definition to: Sewage sludge that has been treated to ensure it is free from salmonella and that 99.9999% of pathogens have been destroyed (a 6 log reduction) OR a maximum allowable concentration of 1,000 E.Coli/gram dry solids.

Condition 4 - Inspections

Further clarity is required on who is responsible for inspecting the waste before acceptance into a farm/field for stockpiling and spreading and how compliance will be assessed for this condition. The Responsible Person holding the Registration might be different from the land owner/occupier who is accepting the waste. In Scottish Water's experience, stockpiles can be created over several days, from multiple lorry loads. Most farmers will inspect a stockpile at some point during its formation, but may not be present for every delivery.

Condition 5 – Written Assessment for Waste Soils

The proposal is to require all waste soil to be accompanied by a written assessment detailing any pollutants that could be present, as well as other hazardous properties based on sampling and analysis. Scottish Water would welcome more guidance on the scope of pollutants that should be included in this assessment.

Condition 6 – Impermeable Surface

This condition requires unauthorised waste to be stored on an impermeable surface. In practice, material that was not authorised would probably be removed from field stockpile locations directly, rather than re-locating temporarily to an impermeable area.

Condition 7 – Unauthorised Access

Refer also to response to Q1.1(a).

It is not clear to Scottish Water how the Responsible Person is to prevent unauthorised access to areas of land that are owned/occupied by another person. For example, when we stockpile biosolids in a field prior to application, we are not in control of access to that field; we can provide advice/guidance to the farmer on the requirement to provide a secure location and we can include it in our risk assessment prior to selecting the farm/field as a suitable location, but ultimately we cannot prevent unauthorised access after the stockpile has been created.

Condition 8 – Labelling Waste Storage Areas

Refer also to response to Q1.1(a).

Scottish Water would welcome an alternative method of identifying waste that has been stockpiled in fields to minimise the potential risk of farmers being identified and targeted by environmental campaigners for applying biosolids to their land.

Condition 9 – Maximum Storage Limit

Instead of having a maximum storage limit of 3000tonnes that applies across a whole farm unit/site, Scottish Water would prefer a maximum storage limit per stockpile.

If a total maximum limit applies across a single location, it is not clear how this would be managed, particularly if the farmer has their own manure stockpiles and/or if another operator is also authorised to use the same location.

A limit of 3000t in total could also limit storage on larger farms/estates that have sufficient capacity to accommodate multiple stockpiles, with minimal risk to the environment when located with care.

Scottish Water would support a limit on individual stockpiles of at least 1000t.

Condition 10 – Storage of Waste

The proposal states that waste must not be stored '*where the land is waterlogged*'. Scottish Water assumes that this condition relates to the initial placement of stockpiles on land. If so, the condition should be amended to clarify this. Further guidance is required from SEPA on the actions that should be taken if land becomes waterlogged whilst a stockpile is in-situ. We would welcome use of a risk-based approach that considers the impact of moving a stockpile versus leaving it and can share our existing processes with SEPA in further discussions if required.

The proposal also states that waste must not be stored where land is sloping unless run-off is intercepted to prevent it from entering a waterbody. Further clarification is required on the definition of 'sloping' and we would support alignment with the existing Technical Guidance for Paragraph 8 exemptions.

Condition 16 – Applications in Harvesting/Growing Periods

The Scottish Government's analysis of the EASR consultation from earlier this year notes that to align with the requirements of the Safe Sludge Matrix (SSM), the regulations will be amended to specify grazing intervals for applications of conventionally treated sewage sludge. Scottish Water would like to see this replicated in the Standard Conditions.

We would also welcome similar updates to EASR and/or more detailed guidance from SEPA, on:

- The crop groups / cropping categories – the proposed standard condition only refers to fruit and vegetable crops whilst the SSM lists more groups (e.g. salad, animal feed crops etc.) and provides examples of the type of crops that are in each category.
- Applicable harvesting intervals for various crop types – the proposed condition does not specify any harvesting intervals whilst the SSM does specify periods when no applications are allowed for various crop types and different types of biosolids. In particular, Scottish Water would welcome further clarity on whether different application rules will apply to vegetables that are grown for human consumption and those grown for animal feed.

It is currently not clear if the SSM restrictions will still apply when EASR comes into force.

Condition 18 – Application of Waste to Land

Waste is not to be applied to land in excess of the amount required to maintain the phosphorus status at '*acceptable agronomic levels*'. Further guidance is required on

the definition of 'acceptable' to ensure a consistent approach is applied across all wastes.

Waste is not to be applied to land that is 'waterlogged, saturated, snow covered or frozen'. Further clarity is required on the definition of 'saturated' and how this differs from 'waterlogged'. The term 'saturated' is not included in the proposed EASR amendment for General Binding Rules.

Condition 20 – Soil Concentrations

The proposed amendments to EASR state that soil samples should be taken to 'the depth of the topsoil or 15cm, whichever is deeper'. It would be helpful if the Standard Conditions reiterated that the maximum permissible concentrations apply at this depth.

It would also be helpful if guidance was given on how to determine the topsoil depth. It is not always straightforward to identify individual soil layers, particularly when soil has been heavily cultivated over many years.

Scottish Water would also like to highlight again our concern about the new limit for Cadmium (0.5mg/kg dry solid for soils <6.0pH). In some areas of Scotland, the naturally occurring background levels of this element could significantly reduce our current landbank. In the Western Isles, this could be up to 60% of the land used in some years. Other outlets are limited in this area and we would, therefore, welcome consideration of an alternative approach that focuses on the impact rather than baseline values. The BAS standard requires expert advice (e.g. from a FACTS qualified adviser) for applications to land where the pH is 5-5.2. Adopting a similar approach for applications to soils with >0.5 mg/kg cadmium would consider crop type (i.e. wheat vs non-wheat crops), as well as the underlying soil/rock type/background concentrations.

Condition 23 – Soil Sampling Prior to First Application of Waste

The proposal is that 'soil sampling must be carried out no more than one year prior to the first application of waste to that land'. It is Scottish Water's understanding that this only applicable for land that has never had waste applied to it. Further guidance is required on how this will be managed in practice.

It is not clear if the condition applies to previous applications of any waste or only to applications of the waste type that we plan to use i.e. is sampling required for land that has never had biosolids applied, but has received previous applications of another waste type?

For efficiency reasons, particularly in more remote areas, Scottish Water often carries out sampling 'campaigns' and whole farms will be sampled at the same time. Some of the farms might have never received biosolids before. Not every field in these farms will then be spread with biosolids within the following year. It is not clear if we will need to re-visit these fields to repeat the sampling activities to ensure compliance with the proposed Standard Condition.

We would welcome further discussion with SEPA to better understand the requirement and how it can be applied in practice.

Condition 39 – Annual Reporting

As noted in our response to Q1.1(a), Scottish Water would prefer the deadline for submission of an annual return to be end of February at the earliest. From

experience, it is not possible to gather all the necessary data within the month of January to meet a deadline of 28th of that month.

Further clarity is required on the '*details*' that must be included in the submission, particularly in relation to the areas where waste has been recovered to land. Scottish Water would expect this to replicate the information that is already submitted as part of the Sludge Register.

More information is also required on the type of '*evidence*' that will be required to demonstrate that the activities have resulted in soil improvement. It may be challenging to prove that wastes applied a few months before the annual return submission date have had a beneficial effect.

Potential Additional Condition

Scottish Water would welcome inclusion of a standard condition in this registration that requires the Responsible Person to contact us prior to selecting fields for application of waste. The aim would be to establish if the field(s) are in a Drinking Water Protected Area (DWPA) so that we can inform them of any restrictions that may apply.

1.2.19.1(b)	<p>Do you agree with the proposed testing frequency for soils? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>Scottish Water notes that the proposed testing frequencies for soils are the same as those set out in the proposed amendments to EASR. We have no objection to the requirements to sample soils every five or ten years, depending on the parameter to be analysed.</p> <p>Our comments about the proposal to require sampling no more than one year prior to the first application of waste (Condition 23) are provided in response to Qu.1.2.19.1(a).</p>	
1.2.19.1(c)	<p>Do you agree with the proposed testing frequency for wastes? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
1.2.19.1(d)	<p>We have aligned the frequency of testing for sewage sludge and other waste types to once every 6 months. This is an increased frequency for non-sewage wastes but is simple and consistent. Do you agree with the increased consistent testing frequency? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	

1.2.19.1(e)	<p>We are proposing removing soils from construction (17 05 04) from the standard conditions template as they should be covered under 1.2.19 below. Do you agree with this approach? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.19.1(f)	<p>We have no record of 04 02 waste codes (from leather, fur and textile industries) being spread on land in Scotland. Should these codes continue to be included in the table of acceptable wastes? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
1.2.19.1(g)	<p>Are there other waste types that you believe should be included or excluded from the table of acceptable waste types? If so, please provide a justification.</p>
No	
1.2.19.1(h)	<p>There is currently no limit proposed for the maximum amount of waste to be used for treatment per hectare, which is a change from the current position under Waste Management Licensing. Should a limit be included? Yes or No.</p> <p>If yes, what should it be and why? A possible suggestion is 50 tonnes/ hectare of liquid waste.</p>
<p>Yes</p> <p>A limit should be applied if additional controls are needed to ensure the application of waste does not impair the quality of the soil, surface water and groundwater.</p>	
1.2.19.1(i)	<p>Some proposed operations may involve several applications of waste. What should the minimum time period between each application be and why?</p>
<p>Any minimum period between applications of waste should be set to ensure 'soil improvement', as defined in the Interpretation of Terms, is not at risk.</p>	
1.2.20.1(a)	<p>Do you agree with the list of standard conditions for the Use of less than, or equal to, 300 tonnes per year of waste in construction? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
No	
<u>Condition 1 – Acceptable Wastes</u>	

<p>It is not clear why the authorised waste types have been limited to those arising from construction activities. Scottish Water would welcome inclusion of EWC Codes 19 08 02 and 19 08 99 (sewage grit and stone filter media respectively). Once washed to remove sewage contamination, these waste aggregates could meet appropriate engineering standards for the relevant use.</p>	
<p>1.2.21.1(a)</p>	<p>Do you agree with the list of standard conditions for the Use of waste for recovery (a) in construction or (b) in reclamation, restoration or improvement of land projects up to and including 100,000 tonnes? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
<p>1.2.22.1(a)</p>	<p>Do you agree with the list of standard conditions for the Incineration of biomass 50kg to 3,000kg per hour? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>N/A</p>	
<p>1.2.22.1(b)</p>	<p>Do you agree with this approach? Yes or No.</p> <p>If you answered no, can you tell us why?</p>
<p>N/A</p>	
<p>1.2.22.1(c)</p>	<p>Do you understand these standard conditions? Yes or No.</p> <p>If you answered no, can you tell us why?</p>
<p>N/A</p>	
<p>1.2.22.1(d)</p>	<p>Can your business comply with these conditions? Yes or No</p> <p>If you answered no, tell us which condition(s) and why?</p>
<p>N/A</p>	
<p>1.3</p>	<p>Additional comments on standard conditions for waste management: registration level activities</p>
<p><u>Interpretation of Terms for Waste Management Activities</u></p> <p>Disposal is not defined. Scottish Water would welcome inclusion of this term as both 'recovery' and 'recycling' are defined and the definition of 'treatment' refers to disposal operations.</p> <p>Effluent is defined as a liquid produced from the storage of any forage crop or other feedstock. This definition does not capture liquids that arise from treatment processes.</p>	

Forage crop is defined but is not used anywhere in the proposed Standard Conditions, other than in the definition of 'effluent'.

Liquid is defined as any aqueous material, excluding sludge. Scottish Water would welcome the inclusion of sewage sludge in the exclusion.

The definition of storage tank does not include use for the storage of sludge or sewage sludge.

1.4.1(a)	<p>Do you agree that the content, style and format of the waste guidance provides additional clarity on the requirements of the standard conditions? Yes or No.</p> <p>If you answered No, can you tell us why?</p>
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<p>No</p> <p><u>Waste Storage and Treatment Guidance</u></p> <p>Written Management System Refer to our response to Qu.1.1(a)</p> <p>Odour Management Plan The guidance requires an odour management plan if the site carries out sewage sludge treatment. Further clarity is required on the definition of 'sewage sludge treatment'. It is not clear if the registration that will authorise storage and treatment of up to 100,000t/yr of specified wastes at a wastewater treatment works (WwTW) covers 'sewage sludge treatment'. The registration limits treatment to physical processes and does not include anaerobic digestion or thermal treatment. Scottish Water has also requested a revision to the scope of 'treatment' in this registration – refer to the response to Qu. 1.2.9.1(a).</p> <p>Fugitive Emissions to Water As noted in our response to Qu. 1.2.9.1(a), the requirement to '<i>provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled</i>' will be challenging to Scottish Water. We would welcome a flexible approach to reducing the risk of fugitive emissions to water from tank spills/leaks.</p> <p><u>Waste Recovery Plan Guidance</u> In the Rationale section for the Registration authorising use of up to 100,000t of waste, it states that it will not allow '<i>use of any waste types not listed in SEPA's waste recovery plan guidance</i>'. However, the guidance document appears to suggest that other waste types may be considered, providing there is sufficient evidence to show that '<i>the waste is suitable for its intended purpose and that the activity will not cause harm to human health or the environment</i>' (Page 6 – Section: Evidence the waste is serving a useful purpose).</p>
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2.1.1.1.1(a)	<p>Do you agree with the list of standard conditions for Activity A1? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
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Yes	
2.1.1.2.1(a)	<p>Do you agree with the list of standard conditions for Activity A2? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
2.1.1.3.1(a)	<p>Do you agree with the list of standard conditions for Activity A3? Yes or No</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration requires the sewage to be '<i>treated by a treatment system that is designed to meet a mean standard of no more than 5mg/l of ammoniacal nitrogen (as nitrogen)</i>'. It is not clear if this standard will be applied as a discharge quality limit and it is not clear how the mean is to be assessed.</p>	
2.1.1.4.1(a)	<p>Do you agree with the list of standard conditions for Activity A4? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
2.1.1.5.1(a)	<p>Do you agree with the list of standard conditions for Activity A5? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
2.1.1.6.1(a)	<p>Do you agree with the list of standard conditions for Activity A6? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
2.1.1.7.1(a)	<p>Do you agree with the list of standard conditions for Activity A7? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
Yes	
2.1.1.8(a)	<p>Do you agree with the list of standard conditions for Activity A8? Yes or No.</p>

	If you answered 'No', please explain your answer.
<p>No</p> <p>This registration requires the sewage to be '<i>treated by a treatment system that is designed to meet no more than 500 E.Coli per 100ml and 200 intestinal enterococci per 100ml</i>'. It is not clear if this standard will be applied as a discharge quality limit.</p>	
2.1.1.9.1(a)	<p>Do you agree with the list of standard conditions for Activity A9? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
2.1.2.1.1(a)	<p>Do you agree with the list of standard conditions for Activity A10? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p> <p>It is not clear if SEPA will be able to initiate an authorisation where an unauthorised discharge of sewage effluent from a treatment system is identified, and the responsible person (or organisation) has not submitted an authorisation through the online application service.</p>	
2.1.2.2.1(a)	<p>Do you agree with the list of standard conditions for Activity A11? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
2.1.3.1(a)	<p>Do you agree with the list of standard conditions for Activity B1? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p> <p>Scottish Water notes that a water treatment works discharging < 10m3/day should be considered for this level of authorisation due to comparable discharge and environmental risk rather than being authorised by a permit.</p>	
2.1.4.1(a)	<p>Do you agree with the list of standard conditions for Activity B2? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	

2.1.5.1(a)	Do you agree with the list of standard conditions for Activity B3? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.1.1(a)	Do you agree with the list of standard conditions for Activity C1? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.2.1(a)	Do you agree with the list of standard conditions for Activity C2? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.3.1(a)	Do you agree with the list of standard conditions for Activity C3? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.4.1(a)	Do you agree with the list of standard conditions for Activity C4? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.5.1(a)	Do you agree with the list of standard conditions for Activity C5? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.2.6.1(a)	Do you agree with the list of standard conditions for Activity D1? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.3.1.1(a)	Do you agree with the list of standard conditions for Activity E1? Yes or No.

	If you answered 'No', please explain your answer.
Yes	
2.3.2.1(a)	Do you agree with the list of standard conditions for Activity E2? Yes or No. If you answered 'No', please explain your answer.
Yes	
2.4.1.1(a)	Do you agree with the list of standard conditions for Activity F1? Yes or No. If you answered 'No', please explain your answer.
No This registration authorises engineering works, specifically bank works, on a watercourse or loch. One of the standard conditions states that the works must not be undertaken ' <i>when fish are likely to be spawning</i> ' or ' <i>during the period between spawning and the subsequent emergence of juvenile fish</i> '. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.	
2.4.2.1(a)	Do you agree with the list of standard conditions for Activity F2? Yes or No. If you answered 'No', please explain your answer.
No This registration authorises engineering works, specifically channel modification of a minor watercourse. One of the standard conditions states that the works must not be undertaken ' <i>when fish are likely to be spawning</i> ' or ' <i>during the period between spawning and the subsequent emergence of juvenile fish</i> '. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.	
2.4.3.1(a)	Do you agree with the list of standard conditions for Activity F3? Yes or No. If you answered 'No', please explain your answer.
No This registration authorises engineering works, specifically channel modification of a watercourse that is associated with a structure. One of the standard conditions states that the works must not be undertaken ' <i>when fish are likely to be spawning</i> ' or ' <i>during the period between spawning and the subsequent emergence of juvenile fish</i> '. Scottish Water would welcome guidance on how this activity would be	

regulated if emergency works were required when fish were spawning and/or developing.	
2.4.4.1(a)	<p>Do you agree with the list of standard conditions for Activity F4? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically installation of a crossing across a watercourse or loch. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
2.4.5.1(a)	<p>Do you agree with the list of standard conditions for Activity F5? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically installation of a crossing across a watercourse that has a bed width of <2m or a loch. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
2.4.6.1(a)	<p>Do you agree with the list of standard conditions for Activity F6? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically installation of an in-stream structure. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
2.4.7.1(a)	<p>Do you agree with the list of standard conditions for Activity F7? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p>	

<p>This registration authorises engineering works, specifically installation of an in-loch structure. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.4.8.1(a)</p>	<p>Do you agree with the list of standard conditions for Activity F8? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically sediment removal. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.4.9.1(a)</p>	<p>Do you agree with the list of standard conditions for activity F9? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically sediment removal in a channel <500m in length. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.4.10.1(a)</p>	<p>Do you agree with the list of standard conditions for Activity F10? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically sediment removal in a channel no more than 1km in length. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.2.11.1(a)</p>	<p>Do you agree with the list of standard conditions for Activity F11? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>

<p>No</p> <p>This registration authorises engineering works, specifically sediment removal in a loch <50m². One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.4.12.1</p>	<p>Do you agree with the list of standard conditions for Activity F12? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>This registration authorises engineering works, specifically removal of a registration scale engineered structure. One of the standard conditions states that the works must not be undertaken '<i>when fish are likely to be spawning</i>' or '<i>during the period between spawning and the subsequent emergence of juvenile fish</i>'. Scottish Water would welcome guidance on how this activity would be regulated if emergency works were required when fish were spawning and/or developing.</p>	
<p>2.5</p>	<p>Additional comments on standard conditions for water: registration level activities</p>
<p>Interpretation of Terms</p> <p>It would be helpful to define 'bank' and 'outfall'.</p> <p>'Grey water' needs to be defined.</p>	
<p>3.1.1</p>	<p>Do you agree with the list of core standard conditions for registration level industrial activities for:</p> <ul style="list-style-type: none"> • Pollution control? Yes or No. • Environmental events? Yes or No. • Record keeping? Yes or No. <p>If you answered 'No' to any of the above, please explain your answer, referencing the standard condition you are commenting on.</p>
<p><u>Pollution Control</u> – No</p> <p>The standard conditions for pollution control for industrial activities are different to those specified for waste activities. For example, noise minimisation is included in the waste activities' conditions and it is not included in the industrial activities. It is not clear why an anaerobic digestion facility, treating less than 100t/day, that is regulated as a waste activity would be subject to different pollution control conditions than a similar facility that is regulated as an industrial activity, when the only difference is the type of material being processed (biowaste vs non-waste).</p> <p><u>Environmental Events</u> – Yes</p> <p><u>Record Keeping</u> – No</p> <p>The standard conditions for record keeping are different to those specified for waste activities. For example, where emissions monitoring is required, the results</p>	

must be submitted to SEPA within eight weeks. It is not clear why an anaerobic digestion facility, treating less than 100t/day, that is regulated as a waste activity would be subject to different record keeping conditions than a similar facility that is regulated as an industrial activity, when the only difference is the type of material being processed (biowaste vs non-waste).	
3.2.1.1.1(a)	Do you agree with the list of standard conditions for the unloading and refuelling of petrol at service stations? Yes or No. If you answered 'No', please explain your answer.
N/A	
3.2.1.2.1(a)	Do you agree with the list of standard conditions for the unloading of petrol into stationary storage tanks at a service station? Yes or No. If you answered 'No', please explain your answer.
N/A	
3.2.2.1(a)	Do you agree with the list of standard conditions for the dry cleaning of garments, furnishing and similar goods in an industrial or commercial activity using volatile organic compounds? Yes or No. If you answered 'No', please explain your answer
N/A	
3.2.3.1.1(a)	Do you agree with the list of standard conditions for the ensiling of dead fish or fish offal, including the storage of ensiled liquor at the same location below 10m ³ ? Yes or No. If you answered 'No', please explain your answer.
N/A	
3.2.3.2.1	Do you agree with the list of standard conditions for the ensiling of dead fish or fish offal, including the storage of ensiled liquor at the same location above 10m ³ ? Yes or No. If you answered 'No', please explain your answer.
N/A	
3.2.4.1(a)	Do you agree with the list of standard conditions for the repainting or respraying road vehicles or parts of them where the organic solvent use is 2 tonnes or more in any 12-month period? Yes or No. If you answered 'No', please explain your answer.
N/A	

3.2.5.1(a)	<p>Do you agree with the list of standard conditions for the manufacturing of wood products at a works with a throughput in any 12-month period that is likely to exceed:</p> <ul style="list-style-type: none"> a. 10,000 m³ where wood is only sawn; or b. 1,000 m³ where wood is sawed and/or drilled, sanded, shaped, turned, planed, shredded, cured or chemically treated? <p>Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
3.2.6.1(a)	<p>Do you agree with the list of standard conditions for the coating of roadstone with bitumen? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
3.2.7.1(a)	<p>Do you agree with the list of standard conditions for blending cement in bulk or using cement in bulk other than at a construction site, including the bagging of cement and cement mixture, the batching of ready-mixed concrete and the manufacture of concrete blocks and other cement products? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
N/A	
3.2.8.1(a)	<p>Do you agree with the list of standard conditions for the capture of carbon dioxide from any source, unless falling within the activity in Part 4 of Schedule 20, using direct capture/physical separation methods? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>In general, Scottish Water has concerns about specifying conditions without the technology being well enough understood and the extent to which this may inhibit uptake and innovation. It is not clear how trials related to this activity would be regulated.</p> <p>One of the proposed standard conditions requires a minimum rate of capture of 80%. It is not clear why this figure has been chosen. In a climate emergency, anything is valuable and a lower figure might enable emerging technologies to become established before improving their efficiencies.</p> <p>Scottish Water would welcome more information from SEPA on how this registration might apply in practice, for the reasons noted above on the technology, innovation and urgency with which we need to see this develop in a climate emergency.</p>	

3.2.9.1(a)	<p>Do you agree with the list of standard conditions for the anaerobic digestion of <10 tonnes per day of non-waste materials? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>No</p> <p>There are no conditions that restrict the activity to only treating non-waste materials.</p>	
3.2.10.1(a)	<p>Do you agree with the list of standard conditions for the burning any fuel in combustion plant generating electricity on the same site with an aggregated rated thermal input of 1 megawatt or more? Yes or No.</p> <p>If you answered 'No', please explain your answer.</p>
<p>Yes</p>	
3.3	<p>Additional comments on standard conditions for industrial activities: registration level activities</p>
<p>None</p>	

End of document