

Response ID ANON-E365-X956-Y

Submitted to **The management and disposal of Polychlorinated Biphenyls (PCBs) in Scotland**

Submitted on **2020-10-15 16:19:45**

Questions

1 Do you support the proposal to implement the EU requirement for transformers or other relevant equipment containing PCBs to comply with a lower threshold, with 0.005% PCBs or less by weight and volumes of 0.05 dm³ or less being the new maximum acceptable level?

Yes

Please give reasons:

The Resource Management Association Scotland (RMAS) is a not-for-profit and non-political trade association representing micro, small and medium sized companies in the resource management sector in Scotland.

RMAS welcomes the opportunity to respond to this Scottish Government Consultation on the management and disposal of Polychlorinated Biphenyls (PCBs) in Scotland.

This response has been developed by the members of RMAS using their combined knowledge, experience and expertise.

We support the proposal to implement the EU requirement for transformers and other relevant equipment containing PCBs to comply with lower threshold levels of PCBs. We believe that this is a sensible route for government to take. We would also support measures which restrict the use of PCBs in similar items coming to the UK and Scotland from outside of the EU and jurisdictions not covered by EU law or similar. The more uniform the requirement, the easier it is to identify items at end of life. At present, companies are trying to identify legacy items to remove them from the waste stream but there are still items in circulation and use which do not comply and there are items not presently covered by the law. This makes the task of identification more onerous and costly.

2 If you are responding as a business, can you provide any evidence of any expected additional costs or practical implications of reducing the threshold for PCB contamination.

Please provide details here:

The resource and waste sector will be expected to identify and remove PCB (PCB Derivative items such as POPs) from the waste streams ahead of recycling. This will include items such as Waste Electrical and Electronic Equipment (WEEE), carpets, furniture and other items.) At present, companies have two options:

- 1) To identify the product, its make and brand, the serial number of the item and contact the manufacturer to check if the item contains PCBs and at what level. Assuming there is a response (i.e. not all manufacturers may be in business or hold records), then some direction could be given as to whether to remove and treat the item accordingly.
- 2) To test and sort items or constituent elements of those items in such a way as to ensure that no items containing PCBs enter the recycling or waste stream. Both checks add extra costs in the form of administrative burden, testing costs, processing and sorting costs as well as regulatory risk. There is then finally an added cost of treatment for both items which have been sourced, identified, and separated as they require to be treated via high temperature incineration.

We would therefore respectfully ask that:

- 1) Where possible a four nations approach be adopted to avoid unnecessary variations, but we also respect the view of the Scottish Government.
- 2) There is clear regulatory advice and guidance on the treatment and disposal of items containing PCBs or derivatives, and if appropriate, testing regimes which are suitable and fit for purpose.
- 3) They consider any implementation and regulatory processes to ensure that they do not disadvantage Scottish business but still allow for the management of PCBs
- 4) Support business through the transitional period.
- 5) Pay due regard to the impact on reuse of items which may now require to be treated and disposed of rather than their life extended as per the aims of the circular economy
- 6) Fully understand the impact on recycling targets and reuse requirements for items impacted by the regulatory change.

3 Are you content for the Scottish Government to contact you for further clarification of the effects that you have estimated?

Yes

About you

What is your name?

Name:

Hamish Martin

What is your email address?

Email:

info@rmascotland.co.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

SRMA (Scotland) Limited trading as the Resource Management Association Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

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?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: