

Response ID ANON-26FH-MST9-3

Submitted to **River basin management plans - silage, slurry and anaerobic digestate – improving storage and application: consultation**
Submitted on **2021-04-13 16:34:18**

Questions

1 Do you agree with the proposed rules for the control of silage in bales or bulk bags?

Yes

Please explain your view.:

2 Do you agree with the proposed rules on the storage of silage?

Yes

Please explain your view.:

3 Do you agree with the proposal to remove exemptions for silage stores built prior to 1 September 1991?

Yes

Please explain your view.:

4 Do you agree with the proposed revisions to consolidate the storage requirements for slurry across Scotland at 22 weeks for housed cattle and 26 weeks for housed pigs?

Yes

Please explain your view.:

5 Do you agree with the proposal to remove exemptions for slurry stores built prior to 1 September 1991?

Yes

Please explain your view.:

6 Do you agree with the proposed rules for slurry storage?

Yes

Please explain your view.:

7 Do you agree with the proposed rules on the storage of liquid digestate?

Yes

Please explain your view.:

In principle we are in agreement with the new proposals. However the 2 year transition period does not allow sufficient time to inspect numerous current on farm storage to ensure all tanks comply and if not, to construct alternatives. Construction of new stores requires investment, design, planning and construction and this can take time. A 4 year transition, similar to the transition for slurry tanks pre 1991 would enable existing storage tanks to be modified to comply with the new requirements or for new stores to be constructed.

A large percentage of storage is currently facilitated on in-situ farm slurry stores, approximately 400 farms utilise digestate as a source of nutrients as part of their nutrient management plans. Farm storage is used throughout the complete year as short term (a few days or week) stores. In the winter period they also provide storage for several months.

Digestate is produced evenly throughout the year but the requirement for agricultural fertiliser very seasonally restricted in some areas. In order to assist meeting the demand for digestate at peak times, slurry stores are utilised in anticipation of these periods, e.g. digestate is stored on farm in May in anticipation of second cut silage.

Without use of these on-farm stores, haulage direct from the AD sites at these peak periods would far exceed reasonable requirements of what the production site (AD plant) could handle or the availability of tankers etc to facilitate the haulage. This would mean that the market demand for digestate could not be met.

As the storage for slurry and digestate are greatly aligned it is suggested that the requirements for digestate storage capacity and the relating transition period for such is brought in line with those for slurry storage, e.g. 22 week production storage capacity requirement.

Greater emphasis should be placed on covering stores given this is difficult to complete retrospectively unless with light expanded clay aggregate (LECA). Clarity

is needed with regard to the type of covers that are acceptable. The Clean Air Strategy is going to introduce the requirement for covered stores for digestate to minimise ammonia emissions and if stores are constructed or modified in the interim, then it is important that these are 'future-proofed' to ensure the requirements are not changed in a short time frame.

We are unsure how the capacity for storage of digestate will be monitored. Will this be through WML/PPC/planning requirements? Not all AD plants are permitted by SEPA. Further clarity is required and it is important that the requirements are consistent, implemented and enforced fairly to ensure a level playing field. The body responsible for ensuring compliance needs to be adequately resourced to enable this to be done. Without enforcement of the rules there is a risk that compliance will be variable and it makes investment in compliance difficult to justify. It could lead to an unfair market for companies to compete in and difficult for companies to provide clarity on storage requirements. It also makes planning and budgeting for recycling organics to land very difficult.

8 Do you agree with the proposed revised requirements for the notification of new silage, slurry, and liquid digestate structures?

Yes

Please explain your view.:

We support the requirements for notification of new structures but we are unsure of how the process for sign off will be implemented. This needs to have responsibilities clearly defined.

9 Do you agree with the proposal that a Risk Assessment for Manure and Slurry (RAMS) Map should be prepared and issued, to those carrying out organic fertiliser spreading operations?

Yes

Please explain your view.:

We support the requirement for a RAMS map. Further clarification is required on who the holding operator referred to is.

We suggest that this requirement for a risk assessment should be required for all fertilisers applied to agricultural land not only organic manures. There are also risks from applying chemical fertilisers and differentiating between the two suggests that the risk from synthetic/bagged fertilisers are lower than those from organic manures. All the issues (inconsistency, uncertainty etc) can put farmers off taking beneficial organic materials. Not only does this have a large impact on the organic material producers but also encourages farmers to use traditional chemically derived fertilisers which do not support the circular economy of bioresources or the Carbon Net Zero ambitions which are vitally important to improving local and global ways of life. A healthy soil is a large contributor to carbon sequestration and control of GHG emissions.

Will there be one-off financial support be offered to farms to have RAMS completed?

10 Do you agree with proposals for the application of slurry, and liquid digestate, by precision equipment?

Yes

Please explain your view.:

We support the requirements for the use of low emission spreading equipment.

The seasonal and weather dependent application of slurry and digestate results in contractors with low emission spreading equipment already being in high demand at peak periods. There should be a note of caution that the requirement for spreading with low emission spreading equipment does not result in spreading at the incorrect time or in unsuitable conditions in order to access the contractors with this equipment.

Communication and enforcement of the proposed new requirements are essential for their success. It is imperative that sufficient resources are available to ensure that the requirements are communicated to those affected and that the requirements are enforced fairly across the large number of participants.

11 Do you agree with the proposed amendments, on measurements of channel width, to General Binding Rules 5, 6, 8, and 14?

Not Answered

Please explain your view.:

12 Do you agree with the proposed amendments, on operating machinery in a watercourse, to General Binding Rule 9?

Not Answered

Please explain your view.:

13 Do you agree with the proposed amendments, on control of surface water drainage, to General Binding Rule 10?

Not Answered

Please explain your view.:

14 Do you agree with the proposed amendments, on discharge of abstracted groundwater back to groundwater, to General Binding Rule 15?

Not Answered

Please explain your view.:

15 Do you agree with the proposed amendments, on construction of waterbound roads, to General Binding Rule 22?

Not Answered

Please explain your view:

16 Do you agree with the proposed amendments, on placement of trees to prevent bank erosion, to General Binding Rule 25?

Not Answered

Please explain your view:

17 Do you agree with the proposed amendments, on oil storage provisions, to General Binding Rules 27 and 28?

Not Answered

Please explain your view:

About you

What is your name?

Name:

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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Association for Renewable Energy and Clean Technology (REA)

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.: