

**PLACE**

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Edward Mountain MSP
The Scottish Parliament
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Contact: Kevin Wells

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Our Ref:

Your Ref: EM-01

Date: 17 December 2024

Dear Mr Mountain,

MP/MSP Enquiry : EM-01

Subject : Environmental Authorisations (Scotland) Amendment Regulations 2025

Thank you for your letter dated 4th December 2024 regarding the above subject.

Our Officers have reviewed and wish to highlight the following points:

- we support any action that reduces pollution and minimises any impact on the environment. Our concern is how carbon capture storage is being carried out and the potential for leakages. Our preference would be to first decarbonise the industrial processes and thereafter to capture and store the remaining carbon through less risky methods, such as sequestration from woodland, peatland or bog restoration.
- we welcome SEPA's role in monitoring and regulating these activities
- we have concerns regarding the proposal to remove the requirement to plough sewage sludge cake on land that is not used for grazing. This proposal raises concerns about the potential for odour nuisance complaints from sludge which has been left on land. It reduces the currently available solutions in place to control odour nuisance from farming activities.

I trust that this feedback will be helpful to the committee.

Yours sincerely
Kevin Wells
Strategic Director (Place)