



Zero Waste Scotland Ltd.
Moray House
Forthside Way
Stirling
FK8 1QZ

Edward Mountain MSP
Convenor, Energy and Transport Committee
The Scottish Parliament
Edinburgh
EH99 1SP

23rd December 2024

Dear Edward,

I refer to your recent letter regarding the **Environmental Authorisations (Scotland) Amendment Regulations 2025**.

Zero Waste Scotland has not conducted a full assessment of the Regulations with respect to future circular economy objectives. The changes proposed meet the aims and objectives of the original Environmental Authorisations (Scotland) Regulations 2018, in integrating the authorisation, procedural and enforcement arrangements for water, waste, radioactive substances and pollution prevention and control. Effective enforcement to prevent environmental harm is the foundation of a circular economy, minimising loss of valuable resources and maximising the economic and environmental benefits. Given the anticipated roles of carbon capture, utilisation and storage, non-waste anaerobic digestion and other electricity generation activities from waste products, an integrated regulatory framework is a necessary basis to mitigate unintended consequences, remove illicit activity and take a holistic view of operator activities.

Accelerating a circular economy requires innovation, partnerships and establishing a value for materials and products that are otherwise lost to our economy. Whilst we have not identified specific examples of amendments to these Regulations that would be required to accelerate a circular economy, where new opportunities are identified, we would seek to discuss the regulatory landscape with SEPA as an essential delivery partner.

Yours sincerely,

Iain Gulland
Chief Executive



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