



**CONSULTATION ON SEPA'S PROPOSED
ENVIRONMENTAL REGULATION (SCOTLAND) CHARGING SCHEME 2016**

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**SCOTTISH ENVIRONMENT PROTECTION AGENCY
PROPOSED ENVIRONMENTAL REGULATION (SCOTLAND) CHARGING SCHEME 2016**

1 INTRODUCTION AND BACKGROUND

Introduction

This consultation describes SEPA's proposed new Environmental Regulation (Scotland) Charging Scheme (the Scheme). If approved by Scottish Ministers, we are proposing that it will come into effect on 1 April 2016.

Reform of charging is part of our Better Environment Regulation approach. We propose to replace five of the current existing schemes – covering 90% of our chargeable income - with a single, fairer system which prioritises our efforts on activities that have the potential to cause most harm and where poor practice is more likely. Our aim is not to increase the overall income received from subsistence charges, but rather to provide more transparency and a more balanced approach to allocating charges. We do intend to reduce the under-recovery of application charges by a combination of increased charges for specific types of application and changes to improve processing of applications.

Moving from five charging schemes to one single, more consistent, scheme inevitably means that some charges will change. Our assessment indicates that the most charge payers will see a relatively small change in charges. Some will, however, see significant increases or decreases. We propose that changes will be phased-in to help mitigate any impact.

We have set the consultation out as follows:

- Section 1 sets out the background to our proposals;
- Section 2 gives an overview of the proposed Scheme;
- Section 3 outlines the objectives of this consultation;
- Section 4 gives details of other sources of information supporting this consultation;
- Section 5 explains how to respond.

A key purpose of this consultation is to seek views on the Scheme and the proposed measures to phase-in changes. Your feedback will help us to ensure that we can develop a charging scheme which is fair and consistent for all charge payers.

Background

Our funding comes partly from Grant in Aid from the Scottish Government which amounted to £37m in 2014-2015, and from charging for environmental authorisations. The existing charging schemes predate SEPA's formation; developed over the past 19 years. The various schemes were introduced incrementally as new regulatory regimes were introduced. As a result of this, each scheme has its own set of rules, charges and constraints. This leads to a lack of consistency in how our current charging schemes work, and the level of cost recovery achieved by these schemes. Having multiple schemes makes it more difficult to manage and adjust charge allocations overall, to

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ensure that they remain reflective of risks, priority areas and costs over time and to comply with more up-to-date advice and guidance on charge setting. The current arrangements are also over-complicated for charge payers as many are subject to multiple invoices reflecting several different charging schemes under which they operate.

We need to be able to adapt to new challenges, giving primacy to our role on the environment but also delivering outcomes for communities and the economy. It is important that we have the ability to understand pressures on the environment and focus our resources on what matters. This includes being able to target our regulatory activity where it will deliver the most benefit. We want to do more to secure compliance; recognise and promote the business benefits of top class environmental performance; support existing and emerging business sectors; and deliver efficiencies. We want the new charging scheme to support this more flexible way of working.

Better regulation principles are integral to the way we work, including the drive for a risk-based approach, greater transparency, accountability and consistency. This direction builds on our current strengths and changes that have already been delivered. As such, key aspects are:

- An increasingly risk-based, benefits-driven and evidence-led approach, with the flexibility to target effort where it is most needed, leading to more effective protection and improvement of the environment and positive outcomes for communities and the economy.
- A more preventative approach, focusing on root causes and behavioural drivers, choosing the appropriate level of intervention required.
- An increasingly sectorial approach, developing and maintaining an understanding of different sectors, what they are trying to achieve, their performance and tailoring our effort and support accordingly.
- Dealing effectively with illegal operators, such as those involved in waste crime; helping to deliver a level playing field for legitimate operators in which environmental crime doesn't pay.
- Simpler, clearer and more joined-up permissions and supporting processes and guidance, reducing complexity and saving time and money.

Better Environmental Regulation Programme

The Better Environmental Regulation initiative is a wide-ranging programme which includes legislative change such as the environment aspects of the Regulatory Reform (Scotland) Act 2014 and reforming the basis upon which we raise charges. It is supported by our programme of organisational change, transforming how we operate, and deliver benefits made possible by the reform of legislation and charging. This will allow us to become progressively more efficient and cost-effective.

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The Act has provided us with a statutory general purpose, giving primacy to our role on the environment but also recognising the contribution we can, should, and do make towards improving health and well-being, as well as contributing to sustainable economic growth. The Act also enables a new enforcement framework, new powers for criminal courts and a new, integrated permitting¹ framework. This new framework will consolidate the currently separate regulatory regimes for waste; Pollution Prevention and Control; radioactive substances; and water into a single simpler, more proportionate and integrated regime. Alongside the Scottish Government, we are phasing implementation under the Act, with the aim of operating under a new enforcement framework by the end of this year, followed by development of the new integrated framework. There will be phased operational implementation under the latter and this will support our drive to reduce our overall operating costs.

The final development of the Scheme will be influenced by feedback from this consultation. We aim to have a new charging scheme ready for consideration by Scottish Ministers this autumn (as modified in the light of the consultation feedback). Subject to their agreement, we propose to schedule implementation from 1 April 2016.

Stakeholder Engagement

Our engagement with stakeholders has been on-going since 2010. We carried out formal consultations on the principles of a new approach to charging in 2010 and 2012, and this showed support for achieving full cost recovery; moving to a more proportionate and risk-based approach; more effective use of charges to tackle environmental crime; and intervention charges for poor performance. We have continued to discuss reform of charging with a range of stakeholder groups on an on-going basis. This has included holding a stakeholder workshop in June 2013, which explored the principles and type of risk assessment mechanisms that could underpin the design of a new approach. Building on this, the outline design of a new charging model was subsequently discussed at a further stakeholder workshop in December 2013. We initiated a series of sectorial meetings in November 2014 to raise understanding of the way the Scheme has been developed and discuss the underlying data that has been used and to help stakeholders prepare for this formal consultation.

2 OVERVIEW OF THE PROPOSED SCHEME

High Level Principles

The proposed Scheme has been developed based on the following set of high-level principles we established during the 2012 consultation:

¹ We will use the word authorisation and permitting throughout this document to refer to any form of environmental permission.

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- risk-based and environment focused with particular consideration of compliance and risk associated with activity;
- flexible and targeted;
- accountable, transparent and fair;
- stable and resilient;
- simple and proportionate.

Allocating Costs between Charging and Grant in Aid

We have based the proposed new Scheme on a standardised approach in accordance with how costs are allocated between Grant in Aid and charges. We have developed a set of rules (described in Annex A) for defining what should be cost recoverable. As required, this aligns with the [Scottish Public Finance Manual](#) and results in greater consistency and transparency around what is and is not chargeable.

Replacement of Existing Charging Schemes

The five current charging schemes being replaced will include those relating to authorisations for:

- waste management;
- Pollution Prevention and Control;
- the holding/disposal of radioactive substances (Band B and C);
- water abstraction, impoundment and engineering;
- discharges to water.

Not all existing schemes can be replaced, primarily because they are UK wide schemes, implemented on a UK-wide basis by relevant regulators (e.g. Emission Trading). The existing hourly-based charging schemes for regulating nuclear sites will also remain. Future charging associated with our new duty under the Reservoirs (Scotland) Act 2011 will also not be covered under the Scheme, given the different nature (i.e. reservoir-safety focus) of that regulation.

New Charge for Waste Activities

There is a new requirement for work at Material Recovery Facilities brought in by the Statutory Code of Practice. The charges will be distributed across all sites which have activities associated with Material Recovery Facilities. The new charge will increase overall charges for waste management by £210k to £7.3million.

Application Charges

Application charges recover our costs of processing an application for the wide range of activities that require authorising (such as effluent discharges, abstractions, emissions to air, or managing waste). Currently SEPA only

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recovers about 50% of the costs incurred in managing applications via application charges (57% in year 2014-15). We aim to progressively move towards full cost recovery for applications and the proposals below will help us to achieve this.

Currently we have more than a 100 different application charges across the main schemes. We propose consolidating these into 17 charge bands ranging from no-charge to £30,000. These application bands relate to the risk and complexity of the activity and therefore the time taken to progress an application.

In addition to this consolidation, a further 18th band is proposed to cover the largest applications, which require very high levels of regulatory input. These types of application cover:

- large and complex projects with activities which demand substantial resources from us to support the determination process;
- infrastructure projects which have large numbers of small scale activities often developed over an extended time period and geographical area, involving discharges to water, engineering of the water environment, waste management and emissions to air.

Typically we receive one to two of these types of applications per year. They tend to involve complex regulatory issues and substantial levels of public engagement. We consider that it would be unfair to spread the cost of these over other application charges, so we propose that these applications are placed into the 18th charge band. These will be charged based on time and expense considerations. We would be prepared to negotiate an agreement with operators to calculate the charge in advance of submitting the application so as to provide operators with confidence over the level of charge. Under these circumstances, we propose to develop an agreed plan² for determining the application and supporting the project and this will form the basis of SEPA's calculation of charge.

Our experience shows that pre-application discussion with an applicant is an important part of the application process. It can help the applicant produce a good quality application and can help make the overall process of applying for an authorisation more efficient. We have recognised this by allowing for such pre-application discussions in our charges.

Our projections are that the proposed changes in application charges, when applied to applications received in year 2014-15, would enable SEPA to improve the level of cost recovery from 57% to between 70% and 80%. SEPA will aim to achieve full cost recovery on applications by improving the efficiency of the application process so as to deliver reductions in expenditure.

² Such a plan would have appropriate change control mechanisms to give suitable flexibility to all parties to take account of any changes during development of the project.

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Annual Charges

Annual charges recover the on-going costs we incur in delivering the core regulatory duties of protecting and improving the environment. These charges apply each year and cover activities such as site inspections, environmental monitoring and reporting. Overall, SEPA currently recovers 98% of its cost-recoverable expenditure (though the level of cost-recovery varies between the existing schemes). The proposals below are intended to achieve full cost-recovery. We are not proposing to increase the amount of money that we raise to cover existing SEPA expenditure. We are, however, planning to deliver cumulative efficiency saving over the period up to 2020-21 which will allow us to achieve full cost recovery in financial year 2020-21.

We want to allocate our costs on the basis of a fair and consistent approach across charge payers. The proposed Scheme is based on a charging model in which the annual charge is calculated from three components, as follows:



The Activity Charge captures our direct regulatory costs. We have categorised all the prescribed activities that we regulate into over 300 different activity types; for example these include sewage treatment works or waste transfer stations split up according to size. We are able to define the overall level of regulatory resources required for each activity type and therefore the charge that should apply. Generally the charge then increases in proportion to the complexity and environmental risk presented by a site, reflecting our increasing levels of regulatory effort.

We are proposing to introduce a range of reductions in Activity Charges where there is more than one activity type at a site. These will mean that the full charge for the site will be less than the sum of the charges for each activity. This recognises the reduction in effort that applies when activities are closely associated on a single site. The proposals are described under the multiple activities rules in Section 10 of *Annex A. Development of Proposed Scheme*.

The Emission Charge looks to recover our indirect costs (e.g. those associated with environmental monitoring, data management and reporting), reflecting the scale of the emission, abstraction or waste throughput of a site. It takes account of the environmental significance of these variables (not just scale). This is considered to be a fair way of allocating our indirect charges. As our indirect costs are primarily linked to our larger sites, this element of our charge is focused upon those sites. Thus:

- All sites will have a baseline Emission Charge added to their Activity Charge. This ensures that all activities contribute to our indirect costs.

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- Larger sites are responsible for the bulk of the emissions in a sector and these will drive most of our indirect costs. Consequently, these larger sites will also have a separately calculated variable Emissions Charge component. The variable Emission Charge will be allocated in proportion to the scale of the emission, abstraction or waste throughput of a site. This approach to charging delivers the “polluter pays principle”, so that those who have the largest potential environmental footprint generally pay higher charges. We believe that this is a fair way for an environment agency to allocate its indirect costs.

The Compliance Factor will increase the charges for operators with poor compliance records ensuring that their charges properly reflect the additional costs we incur at such sites. We will use some of this funding to support additional work to drive improvements in compliance and thereby in due course reduce our costs. When the scheme fully cost-recovers, any additional funding raised by the compliance factor will be used to reduce charges for compliant operators.

We have operated a Compliance Assessment Scheme since 2009, which provides a transparent framework for assessing an operator’s level of compliance. We are currently reviewing the Compliance Assessment Scheme to make it more consistent and proportionate and will be consulting separately on this. The amended scheme will look to focus on the assessment of environmental harm and major technical non-compliances. This builds on feedback we have received from stakeholders on the operation of the current scheme, which was said to focus too heavily on minor non-compliances. The amended Compliance Assessment Scheme will define the classes of compliance as shown in Table 1 below.

Table 1 also shows how the charging scheme Compliance Factor will vary according to the published annual compliance assessment.

Table 1
Compliance Factors

Level of compliance	Compliance Factor
No compliance assessment	1 (i.e. no change in charges)
Compliant	1 (i.e. no change in charges)
Broadly compliant	1 (i.e. no change in charges)
Improvement required	1.2 to 1.5
Poor compliance	1.5 to 2.5
Very poor compliance	2 to 5

To summarise, we are proposing that the calculation of the total SEPA charge under the new Scheme will be based upon the following components.

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- The Activity Charge will recover the direct regulatory costs. The legal scheme will publish the Activity Charge for each type of activity.
- Emission Assessment Charge which will be calculated by multiplying the Emission Score for each permit (published by the Emission Assessment Scheme) by the emission financial factor (defined within the legal scheme).
- Compliance Assessment Factor which will be defined by the level of compliance for each licence as published by SEPA's Compliance Assessment Scheme.

Future Introduction of Compliance Factor

We expect that a consultation on the proposed amendments to the Compliance Assessment Scheme will be issued later this year. Whilst our aim is to have the new charging scheme operating from 1 April 2016, our intention is to not introduce the compliance factor into the new charging scheme until the amended Compliance Assessment Scheme is in place and operators have had time to adjust to it. We believe that it is important to allow time for operators to understand their compliance rating under the amended Compliance Assessment Scheme and have the opportunity to address any non-compliance before introducing the new compliance factor into the charging scheme.

Our expectation is that the compliance factor will not come into effect for charging until financial year 2018-19 at the earliest. Initially, we expect that the compliance factor will be in the lower end of the ranges shown in the table above. Over subsequent review periods we will increase the strength of the compliance factor. For example, this means that the compliance factor for sites with a "very poor compliance" record may have a factor of two in 2018-19 but this might increase to three at the next review. This will ensure that we will move towards direct cost recovery of our work on non-compliant sites whilst giving operators time to drive improvements in compliance.

Ensuring Charges are Cost-Reflective and Up to Date

Our proposed new charging scheme is being developed during a period of significant transition in our approach to regulation. The Scheme has been designed to be able to adapt to that transition. It is capable of being applied to the existing legislative framework and the new integrated framework of environmental authorisations that will be developed under the Act. The annual charges proposed as part of the new Scheme do not depend upon the legislative nature of the permission but the type of activity that is carried out.

We will periodically review the Scheme to ensure that it remains up to date and that charges remain cost-reflective. The intention is to regularly review the Scheme to reflect the level of regulatory effort expended. We will also build into this a review of the rules for what is cost recoverable to ensure that our compliance with the [Scottish Public Finance Manual](#) is kept up to date.

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Assuming approval of a new Scheme in autumn 2015, we would propose that the first review, including stakeholder consultation, would take place during year 2017-18 to allow amendments to come into effect from spring 2018. Such changes would then cover the period up to spring 2020-21. This two year timescale for the first review would help to ensure that the Scheme is able to adapt to changes enabled under the Act. Thereafter we plan to review the charging scheme every three years. This means that the third revision of the Scheme would come into effect in 2021-22.

The new legislation and our new approach to permitting may mean we are able to introduce new permitting options (e.g. Permits, Standard Permits, Registrations, Notifications or General Binding Rules) quickly. We would not wish to delay the passing on of any efficiency savings associated with such new approaches. As a result, we may review application charges outside of these three-year reviews, and consult annually or as the new authorisations are developed.

Benefits of Charging Model and Incentives for Charge Payers

We believe the proposed Scheme will support our delivery of Better Environmental Regulation as it is risk-based, activity related and delivers greater transparency and consistency. We think it is also fairer, as our charges will better reflect our level of costs. Arrangements for regular review will ensure that charges continue to be cost-reflective and appropriate. Additionally, it is simpler to understand and to administer. The proposed Scheme will replace five out-dated and inconsistent schemes, and help streamline billing arrangements for charge payers. Small and medium-scale operators (who represent 80% of charge-payers) will have a fixed annual charge which they can simply look up (Annex E). There will also be fewer application charges making it easier to identify which one is applicable.

The proposed charging scheme will encourage good environmental performance by providing the following financial incentives to operators.

- The Compliance Factor will provide an incentive for operators to improve their performance by increasing charges for those who have poor or very poor compliance.
- Larger operators, who are subject to the emission charge and who typically are responsible for 80% of emissions, should benefit from lower charges if they significantly reduce their emissions.

We believe that the Scheme should help us - and site operators - deliver positive outcomes for the environment.

Phasing-In the New Charges

We propose that the changes should be phased-in over five years. This would cover two cycles of the Scheme with the full charges coming into effect in year 2020-21. This means that each year between 2016-17 and 2020-21, charges would change in increments of one fifth of the difference between the new and old charge for an authorisation. This will apply to both increases and

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decreases in charge.

When we carry out the review of the scheme for 2018-19, any changes in charges will be phased in over remaining three years (of the five year transitional period) coming into full effect in 2020-21.

Increases in charges

Our costs will continue to be subject to inflationary pressures. We are therefore including a provision which will allow us to increase our charges (as necessary) in line with the rate of inflation at the beginning of each financial year. For this, we will use the Retail Prices Index as published by the Office of National Statistics at the end of September in the previous financial year or zero if there is deflation. The phased in charge will be amended to take account of these inflation changes.

The Scottish Government have introduced statutory Code of Practice that will apply to anyone holding a Waste Management Licence or Pollution Prevention Control (PPC) Permit issued by SEPA for the operation of a Materials Recovery Facility that is or is likely to receive more than 1000 tonnes of mixed dry recyclable waste in any standard tax year.

We are required to enforce this code of practice. We propose to introduce additional charges to recover the costs of £210,000 incurred due to additional work at Material Recovery Facilities. This will be reflected in relevant activity types listed in Tables of the Legal Scheme. These charges will not be phased-in and will come into full effect in 2016/17. Please note that our consultation tool (which provides charge payers with an indication of their charges under the new scheme) is only able to phase-in changes in charges over five years and therefore incorrectly phases this small component of the waste charges over five years.

Specific Exemptions or Reduction in Charges

Charging schemes cannot be designed to cover all eventualities and therefore schemes typically include some exemptions or reductions, which apply to a limited number of circumstances.

We are proposing to remove some existing exemptions or reductions in charges (see Section 13 of “Annex A. Development of Proposed Scheme”). We are proposing to remove these because we consider that the work we do associated with these sites is not recovered at present. This will not increase our income but will enable SEPA to spread these costs more effectively and thereby reduce costs for other existing charge-payers. As such, the following changes in exemptions will be phased-in, reaching their full charge in 2020-21:

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- (i) We propose to progressively remove the current exemptions for hydropower as we have to direct significant resources to ensure their compliance with licence conditions. In 2016 -17, we propose to remove the cap on charges currently set for medium-sized hydropower schemes (between 2MW and 5MW). We propose to remove the exemption from charging for small hydropower schemes (0.1MW and 2MW) from 2018-19. The exemption from charges for micro hydropower schemes (less than 0.1MW) will remain for the time being.
- (ii) We propose to rationalise the charges for mothballed authorisations. Our existing water charging arrangements exempts mothballed licences. This is different to the PPC and WML schemes that charge for mothballed authorisations. We propose to introduce a charge of 20% of the Activity Charge. This will cover the administrative costs of maintaining licencing systems and provides an incentive for operators to surrender licences that are not required. We propose to introduce this charge for PPC and WML permits from 2016-17 and for water permits from 2018-19 when it will affect regulated activities such as fallow fish farms and non-operational irrigation licences.
- (iii) Rationalising the application of charges to active permits. Under the PPC and Waste charging schemes, all active licences and permits face a charge, but some active permits covering discharges to water are exempted under our current water charging scheme. We intend to remove this exemption for water discharges from financial year 2018-19 and will consult on how we propose to do this in 2017.

We are also proposing to introduce some new exemptions or reductions in charges (see Part 2, Section 13 of Annex A. Development of Proposed Scheme). We are doing this because we consider that we do little or no work associated with these sites. These proposed reductions and exemptions cover:

- (i) A reduction in charges for micro-scale or craft scale activities. We have identified some types of activities which could fall into this category but intend to develop this further as a result of the consultation feedback.
- (ii) Exempt from charges abstractions from marine waters and estuaries.

Safeguards and Independent Review

We have built in a number of safeguards into the development of the proposed new charging Scheme:

- There is clear guidance on the construction of charging schemes and what activities can be cost recovered by the regulators in the [Scottish Public Finance Manual](#). The proposed Scheme has been developed in accordance with this.
- The proposed Scheme will be subject to consultation and approval sought from Scottish Ministers before any implementation.

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- The Scheme will be reviewed initially in two years and thereafter every three years to ensure that it remains cost reflective.

We have also provided for an independent review of the development of the proposed new Scheme. This review was undertaken by Scott Moncrieff who concluded that “in broad terms, the new charges are in line with the principles intended.” The review, together with SEPA’s response to the review has been published as Annex G and H of this consultation.

Management of Charge Increases

A key purpose of this consultation is to seek views on the broad impact, both positive and negative, of any new charges and on the proposals for phasing them in.

We want to try to avoid unsustainable financial impacts on our charge payers whilst also maintaining the fairness and coherency of the Scheme. During the consultation period we plan to engage directly with stakeholders who are most likely to be impacted, positively and negatively and to carry out further impact analysis work with them. This will help to inform a final decision on the design of the Scheme.

Summary of timetable

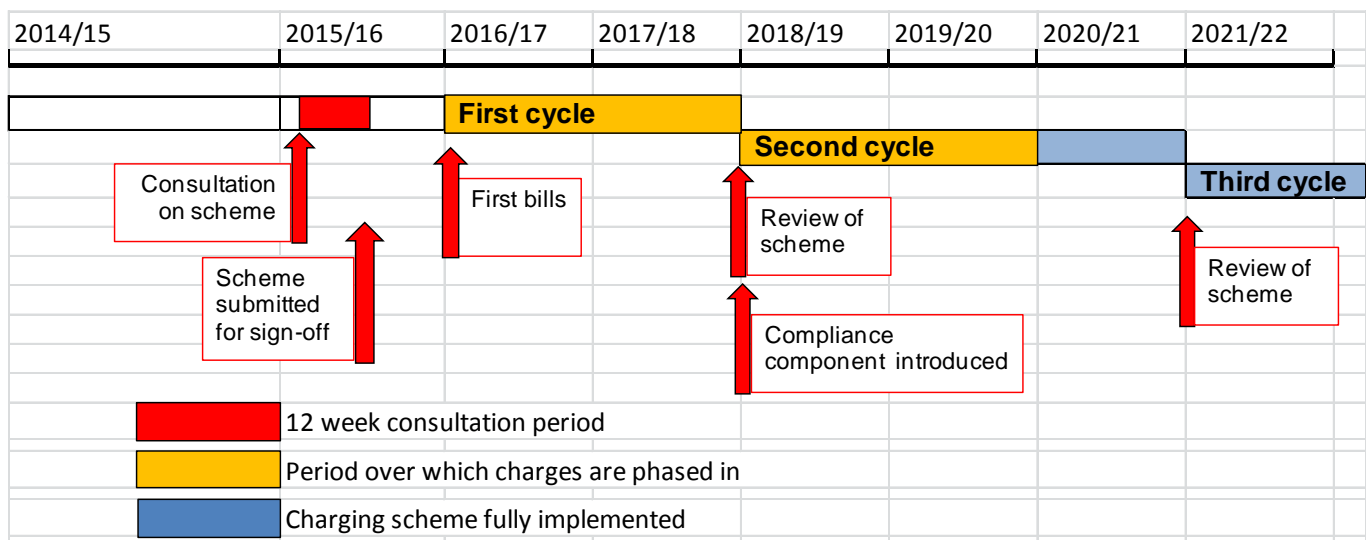
We are proposing the following timetable (see Figure 5) for the implementation of the Scheme:

25 June 2015	issue consultation
17 September 2015	consultation period closes
Autumn 2015	sign-off of Scheme
April 2016	Scheme comes into effect
April 2016 to April 2020/21	Scheme phased into full effect
April 2018	first review of Scheme complete. Second cycle of charging scheme starts
April 2018	compliance component of Scheme introduced
April 2021-22	second review of Scheme complete. Third cycle of charging Scheme starts

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This is shown graphically in Figure 1 below: -

**Figure 1
Indicative Timescale for Implementation of Proposed Charging Scheme**



3 THE OBJECTIVES OF THIS CONSULTATION

Our consultation consists of this document and the supporting documents listed in Section 5. You should read these supporting documents to gain a full understanding of the proposed Scheme.

Consultation Questions: What are your views on the proposed charging scheme?

- Do you have any suggestions for modifying the way the Scheme has been constructed, to remove any unintended or unfair consequences to you or your sector?
- Are there any specific technical issues you have with the working of the Scheme as proposed?
- We are proposing a five-year phasing-in period between 2016-17 and 2020-21. We would welcome views on whether this timeframe is workable.
- The Scheme will include some proposed changes to the exemptions and reductions that have been applied in previous schemes and we would welcome your views on their scope and how they are defined.

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In answering the consultation questions we would ask you to provide your views, the reasons behind your views, and, where possible, any evidence to support your views.

4 OTHER SOURCES OF INFORMATION

Other sources of information

This consultation is supported by the following documents:

- Annex A – Development of Proposed Scheme: This provides the detailed description of how we propose to calculate Application and Annual Charges.
- Annex B - Development of the Activity Charge: This provides a detailed background to how the Activity Charge element of the Scheme was developed.
- Annex C - Development of the Emission Assessment Scheme: This provides a detailed background to how the Emissions Factor element of the Scheme was developed.
- Annex D - Assessment of the financial consequences of the new Scheme.
- Annex E - Draft Legal Scheme – in which the legal basis of the proposed Scheme is defined.
- Annex F – Glossary of terms used in the consultation.
- Annex G – An independent review of the construction of the proposed Scheme.
- Annex H – SEPA’s response to the independent review of proposed Scheme.
- A charge enquiry facility which allows charge payers to access the effect of the proposed Scheme on their charges.

Advice and Discussion

If you have any questions about the consultation, or you have views which you would like to discuss, please contact us via the following email address ncc@sepa.org.uk or phone 0300 099 6699. Where appropriate we would be happy to attend meetings with you and representatives of your sector.

We will also be carrying out engagement with stakeholders during the consultation period to discuss potential sectorial impacts arising from the proposals.

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5 HOW TO RESPOND

You can respond to the consultation online using [Citizen Space](#)³.

You can also respond by sending your views and comments on the proposals to the following address:

Charging Scheme Team
SEPA
Strathallan House
Castle Business Park
Stirling
FK9 4TZ

Responses should be returned by 17 September 2015. Earlier responses would be welcome.

Handling your Response

We would like to know if you are happy for your response to be made public. If responding online, please complete the confidentiality questions where prompted. If responding by post, please complete and return the Respondent Information Form with your response.

If you ask for your response not to be published it will be regarded as confidential and treated accordingly.

³ <https://consultation.sepa.org.uk/charging-team/2016>