

Respondent information form

# Your response

Only complete this form if you are not responding to our standard conditions consultation via [our online consultation hub.](https://consultation.sepa.org.uk/communications/easr_registration_standard_conditions_2024)

Once complete, please email this form to iaf@sepa.org.uk.

# Handling your response

By submitting your response to this consultation, you give SEPA permission to analyse and include your response in our results.

We would like to know if you are happy for your response to be made public. If you ask for your response not to be published, it will be regarded as confidential and treated in accordance with SEPA’s published [Privacy Policy](https://www.sepa.org.uk/help/privacy-policy/).

# About You

1. What is your name? (Optional)

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1. What is your email address? (Optional)

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1. If you have supplied an email address, are you happy to receive communication from SEPA about ongoing developments in the Better Environmental Regulation Programme?

Please delete as appropriate: Yes / No

1. (a) Are you responding to this consultation on behalf of yourself, or a business or organisation? (Required)

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(b) If you are responding on behalf of a business or organisation, please provide the name below:

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1. Are you happy for us to publish your response to this consultation?Please delete as appropriate: Yes / No

# 1 Standard conditions for waste management: registration level activities

## 1.1. Questions

(a) Do you agree with the list of core standard conditions for waste activities for:

* Management systems? Yes or No.
* Waste acceptance? Yes or No.
* Site security? Yes or No.
* Waste storage? Yes or No.
* Pollution control? Yes or No.
* Environmental event reporting? Yes or No.
* Recording and reporting? Yes or No.

If you answered 'No' to any of the above, please explain your answer, referencing the standard condition you are commenting on.

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## 1.2.2.1 Questions

1. Do you agree with the list of standard conditions for Transporting Waste? Yes or No

If you answered 'No', please explain your answer.

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## 1.2.3.1 Questions

1. Do you agree with the list of standard conditions for Acting as a broker or dealer of waste? Yes or No.

If you answered 'No', please explain your answer.

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## 1.2.4.1 Questions

1. Do you agree with the list of standard conditions for the Storage of asbestos waste in a single sealed container not greater than 40 cubic metres? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.5.1 Questions

* + 1. Do you agree with the list of standard conditions for the Storage of less than, or equal to, 2,500 tonnes of waste per year for recovery, except for activities within the scope of the Code of Practice on Sampling and Reporting at Materials Facilities? Yes or No.

If you answered ‘No’, please explain your answer.

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* + 1. Are there any waste types, not currently included, that you believe should be included in this Registration?

Please list the waste types you believe should be included, below:

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* + 1. Are there any waste types, currently included, that you believe should be excluded from this Registration?

Please list the waste types you believe should be excluded, below:

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* + 1. Do you agree that, due to the risks associated with them, the storage of lithium-ion batteries should be excluded from this Registration? Yes or No.
		2. Do you agree with the storage time and volume limits contained in this Registration? Yes or No.

## 1.2.6.1 Questions

* + - * 1. Do you agree with the list of standard conditions for the Storage of less than, or equal to, 10 waste motor vehicles at any one time? Yes or No.

If you answered ‘No’, please explain your answer.

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* + - * 1. Do you agree with the conditions relating to storage of electric and hybrid motor vehicles? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.7.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 5 waste motor vehicles at any one time (not including waste electric or hybrid vehicles)? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.8.1 Questions

(a) Do you agree with the list of standard conditions for the “Storage and treatment of less than, or equal to, 25m3 of waste cooking oil at any one time to manufacture biodiesel”? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.9.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 100,000m3 of waste in a 12-month period within the boundary of a water treatment works or a wastewater treatment works (including the sludge treatment facility)? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.10.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 20,000 tonnes of inert and excavation waste at any one time for the manufacture of construction aggregates? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.11.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 10,000 tonnes of metal waste for recovery at any one time? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.12.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 1,000 tonnes of wood waste for recovery at any one time? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.13.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 500 tonnes of segregated non-hazardous waste for recycling at any one time, except for activities to which the Code of Practice on Sampling and Reporting at Materials Facilities applies? Yes or No.

If you answered ‘No’, please explain your answer.

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(b) Are there any other non-hazardous waste types you think should be excluded from this Registration?

If yes, please specify which ones, and why.

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## 1.2.14.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and preparation for reuse of waste (not including WEEE)? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.15.1 Questions

(a) Do you agree with the list of standard conditions for the storage and treatment of less than, or equal to, 35 tonnes of waste electronic and electrical equipment at any one time by repairing, refurbishing, or dismantling it for the purpose of:

(a) reusing the WEEE for its original purpose;

(b) reusing any dismantled components for their original purpose; or

(c) manually dismantling WEEE for the purpose of recovery elsewhere?

If you answered ‘No’, please explain your answer.

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## 1.2.16.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 500 tonnes of biowaste for composting in open systems at any one time, with a capacity of equal to or less than 75 tonnes a day? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.17.1 Questions

(a) Do you agree with the list of standard conditions for the Storage and treatment of less than, or equal to, 500 tonnes of biowaste for composting in an enclosed system at any one time, with a capacity of equal to or less than 75 tonnes a day? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.18.1 Questions

(a) Do you agree with the list of standard conditions for the Anaerobic digestion of less than, or equal to, 100 tonnes of biowaste per day? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.19.1 Questions

(a) Do you agree with the list of standard conditions for the Use of waste on land for the purpose of soil improvement (single farm/site)? Yes or No.

If you answered ‘No’, please explain your answer.

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(b) Do you agree with the proposed testing frequency for soils? Yes or No.

If you answered ‘No’, please explain your answer.

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(c) Do you agree with the proposed testing frequency for wastes? Yes or No.

If you answered ‘No’, please explain your answer.

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(d) We have aligned the frequency of testing for sewage sludge and other waste types to once every 6 months. This is an increased frequency for non-sewage wastes but is simple and consistent. Do you agree with the increased consistent testing frequency? Yes or No.

If you answered ‘No’, please explain your answer.

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(e) We are proposing removing soils from construction (17 05 04) from the standard conditions template as they should be covered under 1.2.19 below. Do you agree with this approach? Yes or No.

If you answered ‘No’, please explain your answer.

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(f) We have no record of 04 02 waste codes (from leather, fur and textile industries) being spread on land in Scotland. Should these codes continue to be included in the table of acceptable wastes? Yes or No.

If you answered ‘No’, please explain your answer.

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(g) Are there other waste types that you believe should be included or excluded from the table of acceptable waste types? Yes or No

If you answered ‘Yes’, please specify the waste types and explain your answer below:

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(h) There is currently no limit proposed for the maximum amount of waste to be used for treatment per hectare, which is a change from the current position under Waste Management Licensing. Should a limit be included? Yes or No.

If yes, what should it be and why? A possible suggestion is 50 tonnes/ hectare of liquid waste.

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(i) Some proposed operations may involve several applications of waste. What should the minimum time period between each application be and why?

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## 1.2.20.1 Questions

(a) Do you agree with the list of standard conditions for the Use of less than, or equal to, 300 tonnes per year of waste in construction? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.21.1 Questions

(a) Do you agree with the list of standard conditions for the Use of waste for recovery (a) in construction or (b) in reclamation, restoration or improvement of land projects up to and including 100,000 tonnes? Yes or No.

If you answered ‘No’, please explain your answer.

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## 1.2.22.1 Questions

(a) Do you agree with the list of standard conditions for the Incineration of biomass 50kg to 3,000kg per hour? Yes or No.

If you answered ‘No’, please explain your answer.

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(b) Do you agree with this approach? Yes or No.

If you answered no, can you tell us why?

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(c) Do you understand these standard conditions? Yes or No.

If you answered no, can you tell us why?

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(d) Can your business comply with these conditions? Yes or No

If you answered no, tell us which condition(s) and why?

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## 1.3 Questions

(a) Additional comments on Standard conditions for waste management: registration level activities.

Please comment here if you have any additional feedback on Section 1, Standard conditions for waste management: registration level activities.

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## 1.4.1 Questions

(a) Do you agree that the content, style and format of the guidance provides additional clarity on the requirements of the standard conditions? Yes or No.

If you answered No, can you tell us why?

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2 Standard conditions for water activities: Registration level activities

## 2.1.1.1 Questions

(a) Do you agree with the list of standard conditions for Activity A1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.2 Questions

(a) Do you agree with the list of standard conditions for Activity A2? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.3 Questions

(a) Do you agree with the list of standard conditions for Activity A3? Yes or No

If you answered ‘No’, please explain your answer.

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## 2.1.1.4 Questions

(a) Do you agree with the list of standard conditions for Activity A4? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.5 Questions

(a) Do you agree with the list of standard conditions for Activity A5? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.6 Questions

(a) Do you agree with the list of standard conditions for Activity A6? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.7 Questions

(a) Do you agree with the list of standard conditions for Activity A7? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.8 Questions

(a) Do you agree with the list of standard conditions for Activity A8? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.1.9 Questions

(a) Do you agree with the list of standard conditions for Activity A9? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.2.1 Questions

(a) Do you agree with the list of standard conditions for Activity A10? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.2.2 Questions

(a) Do you agree with the list of standard conditions for Activity A11? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.3.1 Questions

(a) Do you agree with the list of standard conditions for Activity B1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.4.1 Questions

(a) Do you agree with the list of standard conditions for Activity B2? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.1.5.1 Questions

(a) Do you agree with the list of standard conditions for Activity B3? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.1.1 Questions

1. Do you agree with the list of standard conditions for Activity C1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.2.1 Questions

(a) Do you agree with the list of standard conditions for Activity C2? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.3.1 Questions

(a) Do you agree with the list of standard conditions for Activity C3? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.4.1 Questions

(a) Do you agree with the list of standard conditions for Activity C4? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.5.1 Questions

(a) Do you agree with the list of standard conditions for Activity C5? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.2.6.1 Questions

(a) Do you agree with the list of standard conditions for Activity D1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.3.1.1 Questions

(a) Do you agree with the list of standard conditions for Activity E1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.3.2.1 Questions

(a) Do you agree with the list of standard conditions for Activity E2? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.1.1 Questions

(a) Do you agree with the list of standard conditions for Activity F1? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.2.1 Questions

(a) Do you agree with the list of standard conditions for Activity F2? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.3.1 Questions

(a) Do you agree with the list of standard conditions for Activity F3? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.4.1 Questions

(a) Do you agree with the list of standard conditions for Activity F4? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.5.1 Questions

(a) Do you agree with the list of standard conditions for Activity F5? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.6.1 Questions

(a) Do you agree with the list of standard conditions for Activity F6? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.7.1 Questions

(a) Do you agree with the list of standard conditions for Activity F7? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.8.1 Questions

(a) Do you agree with the list of standard conditions for Activity F8? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.9.1 Questions

(a) Do you agree with the list of standard conditions for activity F9? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.10.1 Questions

(a) Do you agree with the list of standard conditions for Activity F10? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.4.11.1 Questions

(a) Do you agree with the list of standard conditions for Activity F11? Yes or No.

If you answered ‘No’, please explain your answer.

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## 2.5 Questions

(a) Additional comments on Standard conditions for water activities: registration level activities.

Please comment here if you have any additional feedback on Section 2, Standard conditions for water activities: registration level activities.

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3 Standard conditions for industrial activities: registration level activities

## 3.1.1 Questions

* + - * 1. Do you agree with the list of core standard conditions for registration level industrial activities for: for:
* Pollution control? Yes or No.
* Environmental events? Yes or No.
* Record keeping? Yes or No.

If you answered ‘No’ to any of the above, please explain your answer, referencing the standard condition you are commenting on.

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## 3.2.1.1 Questions

(a) Do you agree with the list of standard conditions for the unloading and refuelling of petrol at service stations? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.1.2 Questions

(a) Do you agree with the list of standard conditions for the unloading of petrol into stationary storage tanks at a service station? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.2 Questions

(a) Do you agree with the list of standard conditions for the dry cleaning of garments, furnishing and similar goods in an industrial or commercial activity using volatile organic compounds? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.3.1 Questions

(a) Do you agree with the list of standard conditions for the ensiling of dead fish or fish offal, including the storage of ensiled liquor at the same location below 10m³? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.3.2 Questions

(a) Do you agree with the list of standard conditions for the ensiling of dead fish or fish offal, including the storage of ensiled liquor at the same location above 10m³? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.4 Questions

(a) Do you agree with the list of standard conditions for the repainting or respraying road vehicles or parts of them where the organic solvent use is 2 tonnes or more in any 12-month period? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.5 Questions

(a) Do you agree with the list of standard conditions for the manufacturing of wood products at a works with a throughput in any 12-month period that is likely to exceed:

1. 10,000 m³ where wood is only sawn; or
2. 1,000 m³ where wood is sawed and/or drilled, sanded, shaped, turned, planed, shredded, cured or chemically treated?

Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.6 Questions

(a) Do you agree with the list of standard conditions for the coating of roadstone with bitumen? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.7 Questions

(a) Do you agree with the list of standard conditions for blending cement in bulk or using cement in bulk other than at a construction site, including the bagging of cement and cement mixture, the batching of ready-mixed concrete and the manufacture of concrete blocks and other cement products? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.8 Questions

(a) Do you agree with the list of standard conditions for the capture of carbon dioxide from any source, unless falling within the activity in Part 4 of Schedule 20, using direct capture/physical separation methods? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.9 Questions

(a) Do you agree with the list of standard conditions for the anaerobic digestion of <10 tonnes per day of non-waste materials? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.2.10 Questions

(a) Do you agree with the list of standard conditions for the burning any fuel in combustion plant generating electricity on the same site with an aggregated rated thermal input of 1 megawatt or more? Yes or No.

If you answered ‘No’, please explain your answer.

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## 3.3 Questions

1. Additional comments on Standard conditions for industrial activities: registration level activities.

Please comment here if you have any additional feedback on Section 3, Standard conditions for industrial activities: registration level activities.

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