



Scottish Environment  
Protection Agency

Buidheann Dion  
Àrainneachd na h-Alba



# FORESTRY AND WOOD PROCESSING SECTOR PLAN

DRAFT FOR CONSULTATION

June 2019

For information on accessing this document in an alternative format or language please either contact SEPA by telephone on 03000 99 66 99 or by email to [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk)

If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language.

<http://contactscotland-bsl.org/>

# Contents

## Preface

1. **Introduction**
2. **Our vision for the forestry and wood processing sector**
3. **Outcomes**
4. **The forestry and wood processing sector**
5. **Potential environmental impacts and how they are managed**
6. **Tackling non-compliance and taking opportunities to go beyond**
7. **Summary of actions and aspirations**

## Why we are consulting

The draft sector plan is our initial ideas on where we can make the most significant impact. Getting feedback early in the process from our communities, partners and stakeholders is important and your feedback is critical to the success of our sector planning approach. If you think that we have got something wrong, missed a critical opportunity or not been as transparent as possible, please let us know your thoughts.

We aim to get this plan finalised in the autumn and then push on to implement it. Your views will also help to shape the prioritisation for the implementation, which will be completed following the consultation period.

The consultation is open until 23 September 2019. Have your say, by completing the online consultation survey available from: <https://consultation.sepa.org.uk/sector-plan/forestry-wood-processing-sector-plan>



**SEPA has a strong track record of regulating to improve the Scottish environment. We are proud of what we have achieved since we were set up just over two decades ago in 1996. We know we need to do more over the next two decades to build on this success. Much more.**

---

The mounting scientific evidence about climate change, plastics in our oceans, the pressure on our freshwater and more, shows us that humanity must rise to tackle major environmental challenges. This scientific knowledge underpins SEPA's strategy for how we will regulate - One Planet Prosperity. If everyone in the world lived as we do in Scotland, we would need three planets. There is only one.

So, we will regulate to help Scotland prosper within the means of our one planet. Successful businesses in future will be those that use low amounts of water, materials and carbon-based energy and create little waste. Prosperous societies will be comprised of these businesses. This can be Scotland.

In every sector we regulate, this means we will have two simple aims. We will:

1. ensure that all businesses fully meet their environmental compliance obligations;
2. help as many businesses as possible move beyond their environmental compliance obligations.

This draft sector plan outlines how we will do this in regulating the forestry and wood processing sector. It recognises the efforts made by the sector over the last 20 years to improve environmental performance in line with the UK Forestry Standard, which sets the benchmark for sustainable forestry management. Our plan outlines how SEPA will use the full scope of our regulatory responsibilities in working with others to regulate, support and influence the forestry and wood processing sector, improve compliance, reduce the number of unlicensed sites and support the Scottish Government to deliver its long-term vision for Scottish Forestry.

Forests can help mitigate climate change, enhance land management and biodiversity outcomes and can achieve many other environmental benefits. As societies attempt to physically build a more viable long-term future, timber can be a

source of lower environmental impact material used in everything from small household items through to large infrastructure projects. Forestry and wood processing can also create a range of significant social, environmental and economic advantages for Scotland. The potential is huge.

However, poor forestry stewardship and site management can cause environmental harm. That is why this draft sector plan is so important. We know the Scottish Government has set high ambitions for this sector and that the industry and many other stakeholders share these aims. This plan sets out our ideas for how we can play our role as Scotland's environment protection regulator to ensure that these aspirations are achieved with environmental excellence at the heart of the sector's activities.

Our plan is ambitious. It spells out how we will use traditional environmental protection agency (EPA) regulatory tools, such as permits and enforcement, in clearer and more powerful ways. It sets out some completely new ways, such as novel partnerships, that we will develop and use to support innovation in this sector.

We would love to hear what you think of our draft plan. Once it's finalised, we are going to push on and implement it. So if you think we've got something wrong, missed something out or not been as transparent as possible, please let us know your thoughts. We want to get this right and then get on with it.

**Terry A'Hearn**  
SEPA Chief Executive Officer

# 1. Introduction

SEPA's statutory purpose is to protect and improve the environment in ways that, as far as possible, create health and wellbeing benefits and sustainable economic growth. To help create a prosperous Scotland that lives within the means of our one planet, we need to radically change the way we work. In the past our approach to regulation has been grounded in different sets of rules to protect the environment. This has helped us to deliver, for example, improvements in water quality. However, it will not enable us to make the transformational changes needed to tackle today's problems.

We are moving instead to ground our approach to regulation and partnership working across whole sectors. In this way we can systematically identify the compliance issues that need to be tackled by the sector. However, compliance and small scale incremental change will not be enough to create a sustainable and prosperous Scotland. We want to help businesses and sectors to implement successful innovation and support them in their ambitions to do more than they are required to by regulation. We call this **moving beyond compliance**: helping businesses to do more for the environment because it makes sense for them to grow in a sustainable manner.

## **Compliance and beyond compliance in the forestry and wood processing sector**

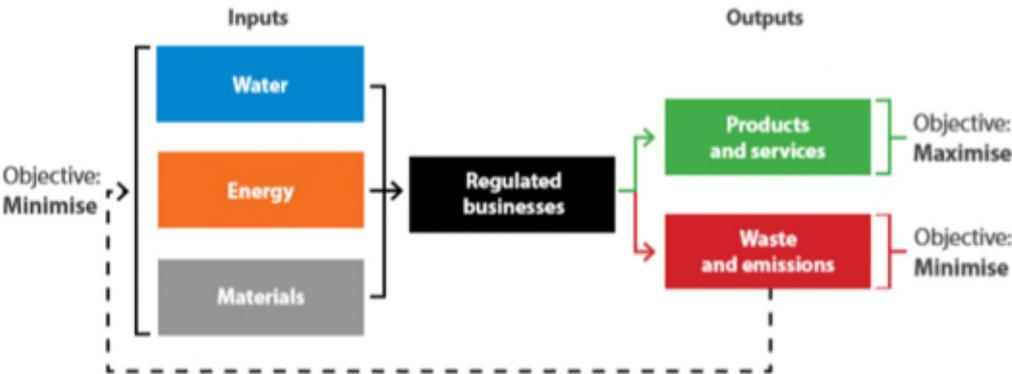
'Compliance' refers to compliance with environmental obligations for which SEPA has a regulatory remit or statutory influencing role (see Section 5).

'Beyond compliance' means voluntarily choosing to do more for the environment than is required by regulation. Many businesses and organisations working in the sector already do this, often because using our resources in an efficient way makes good economic sense.

Many businesses in the forestry and wood processing sector are already moving beyond compliance, for example through forestry managers meeting the UK Forestry Standard<sup>1</sup> (UKFS) that outlines good stewardship and sustainable management of our forests. We can also identify where the biggest opportunities are for us to help the sector to go beyond compliance. In both ways this will help regulated businesses operate successfully within the means of one planet.

All businesses that we regulate in a sector use water, energy and raw materials to produce the products and services they sell. In doing so, they also create waste and emissions. We can think of these as environmental flows that need to be managed by the business (Figure 1).

**Environmental flows (Figure 1)**



We want to help as many businesses as possible to manage these flows effectively. Reducing their use of natural resources (except sustainably sourced wood) and reducing the creation of waste, will enable them to meet their legal obligations, drive further improvements and operate their business successfully. To facilitate this, we are preparing sector plans for every sector that we regulate.

Sector plans are at the heart of everything we do, shaping the interactions with every sector and the businesses in them. Through them, operators will get the relationship that their attitude and performance earns. Those that demonstrate a commitment to good environmental performance and to delivering solid outcomes will receive continued and powerful support through guidance and advice. Those that

<sup>1</sup> [UK Forestry Standard](#)

demonstrate behaviour which leads to significant or chronic non-compliance can expect SEPA to offer clear guidance alongside the most appropriate enforcement tools, where necessary, to bring them into compliance.

Sector plans are strategic documents and their aims and aspirations will evolve over time. Implementation of the plans will take account of opportunities, for example to work across different sectors, improve communications and develop partnerships. SEPA will also consider the relative corporate priority of different work areas.

### **Scope of the forestry and wood processing sector plan**

This is our plan for the forestry and wood processing sector. It details areas we directly regulate, areas we provide a secondary regulatory role and areas where we can influence the sector in order to protect and improve the environment.

The responsible authority for the regulation of forestry management in Scotland is the Scottish Government's Scottish Forestry agency<sup>2</sup>. Although we are not the main regulator in terms of forestry activities, we expect full compliance with environmental regulations and work in collaboration with Scottish Forestry to carry out our joint duties.

The plan focuses on:

- forestry and woodland, including planning, planting, management, harvesting operations and transport;
- processing and treatment of wood such as sawmills, paper and pulp mills, timber treatment sites and wood-based panel production;
- re-use and end-of-life, including burning to generate heat and/or power.

It explains how we will work directly with operators and sites and includes ways that we will use our shared influence to improve environmental performance throughout the industry supply chain.

---

<sup>2</sup> [Explanation of the forestry agencies from April 2019](#)

## 2. Our vision for the forestry and wood processing sector

- **Scotland continues to have a resilient, sustainable forestry and wood processing sector that delivers environmental, social and economic success to Scotland’s people and businesses.**
- **Scottish forestry continues to be valued nationally for its expanding contribution to reducing the effects of climate change and contributing to a low carbon, circular economy.**
- **Strong and effective partnership working with all stakeholders and communities promotes positive relationships, excellent environmental compliance, innovation and collaborative research and development.**
- **Consumers are encouraged to choose locally sourced products because they are grown, selected and managed to high environmental standards.**

The Scottish Government has recently published Scotland’s Forestry Strategy<sup>3</sup>, which sets out a long-term vision for Scottish forestry in line with the Forestry and Land Management (Scotland) Act 2018. Our sector plan aligns with the strategy, and SEPA will work collaboratively with the Scottish Government and the forestry and wood processing sector to deliver its vision, aims and priorities.

**Forestry and wood processing vision characteristics (Figure 2)**



<sup>3</sup> [Scotland’s Forestry Strategy 2019-2029](#)

### Consultation question 1:

- (a) Do you agree with our vision and the level of ambition?
- (b) Would you like to see anything added or amended to improve our vision?

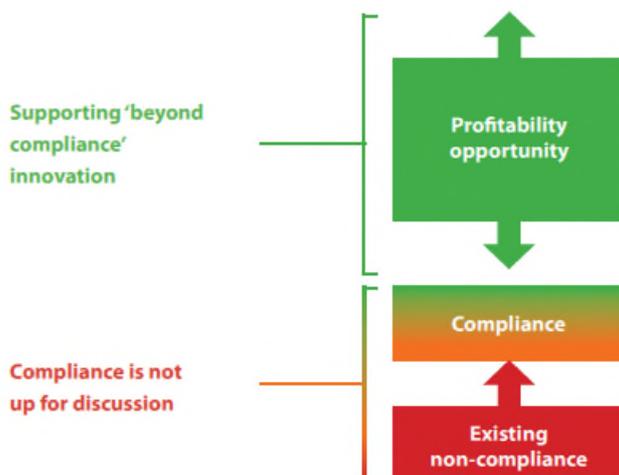
## Our objectives

The objectives of the forestry and wood processing sector plan are to:

- ensure that all businesses fully meet their environmental compliance obligations;
- help as many businesses as possible move beyond their environmental compliance obligations.

This is illustrated by the sector roadmap (Figure 3).

### Sector roadmap (Figure 3)



This sector plan sets out how we will work with the forestry and wood processing sector. For our vision and objectives to be achieved we will work with partners and facilitate liaison between them and the sector to create opportunities that link business success with environmental success.

As well as helping businesses to reduce their impacts on the environment, SEPA's sector plans will deliver the ambitions set out in many SEPA and Scottish Government policy frameworks and strategies including for example, river basin

management plans<sup>4</sup>, the Waste to Resources Framework<sup>5</sup>, the Energy Framework<sup>6</sup>, the Climate Change Commitment Statement<sup>7</sup> and the flood risk management strategies<sup>8</sup>.

We want to continue to bring together skilled, experienced and innovative people from across the sector to understand key challenges and opportunities to create innovative solutions. If we get this right, it will mean that the environment is not seen as a constraint, but a platform on which economic and social success can be built, putting the forestry and wood processing sector further down the pathway to becoming a one planet sector.

---

<sup>4</sup> <https://www.sepa.org.uk/environment/water/river-basin-management-planning/the-current-plans/>

<sup>5</sup> <https://www.sepa.org.uk/media/219528/one-planet-prosperity-a-waste-to-resources-framework.pdf>

<sup>6</sup> [https://www.sepa.org.uk/media/383806/sepa\\_energy\\_framework.pdf](https://www.sepa.org.uk/media/383806/sepa_energy_framework.pdf)

<sup>7</sup> <https://www.sepa.org.uk/media/369292/climate-change-commitment-statement.pdf>

<sup>8</sup> <http://apps.sepa.org.uk/FRMStrategies/>

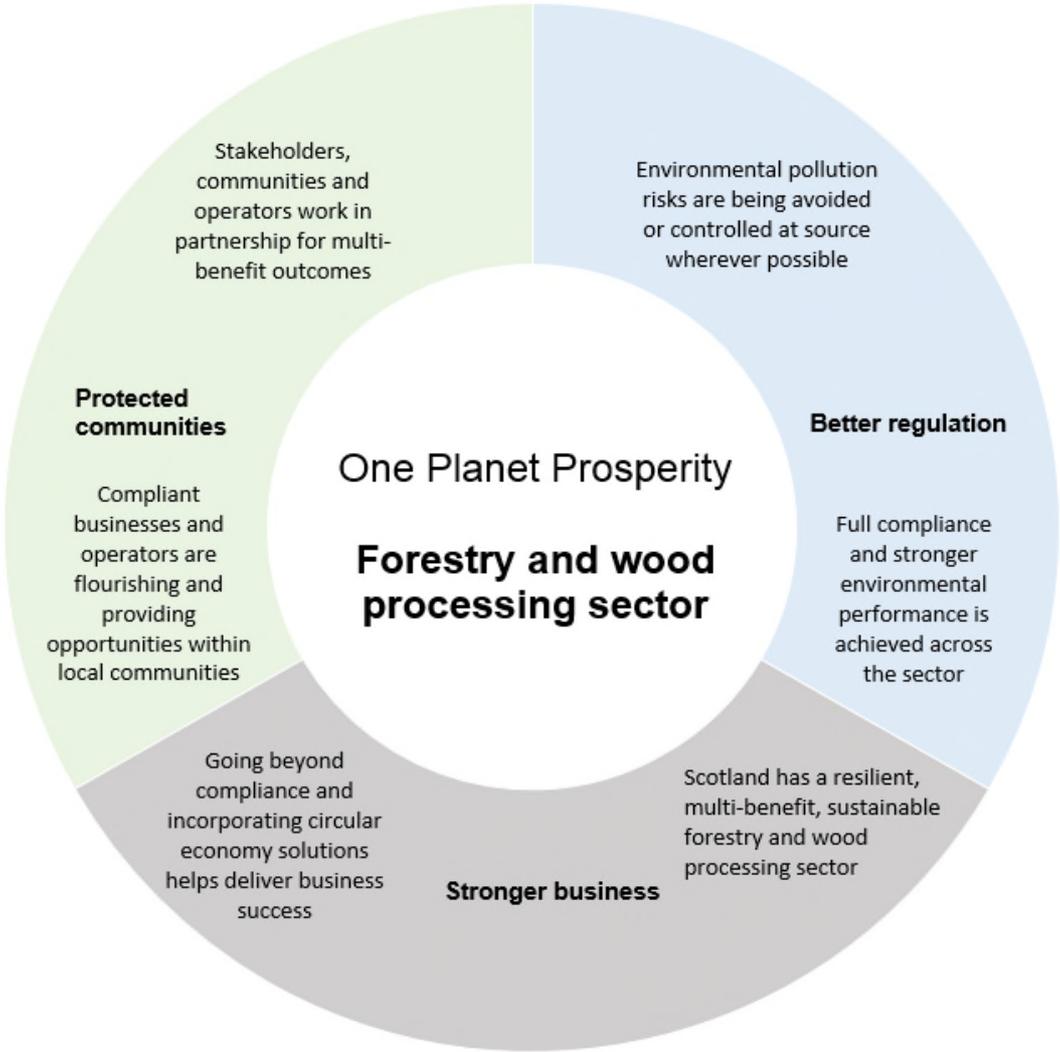
### 3. Outcomes

If we achieve the vision we have set out in this plan, we will help to:

- protect and improve the environment;
- protect communities;
- further enable businesses to operate effectively and successfully in their markets.

Figure 4 shows the outcomes we would like to help the forestry and wood processing sector achieve. These also contribute towards achieving United Nations (UN) Sustainable Development Goals and targets set in the Scottish National Performance Framework<sup>9</sup>. The rest of the plan outlines how SEPA will bring about these outcomes.

**Outcomes (Figure 4)**

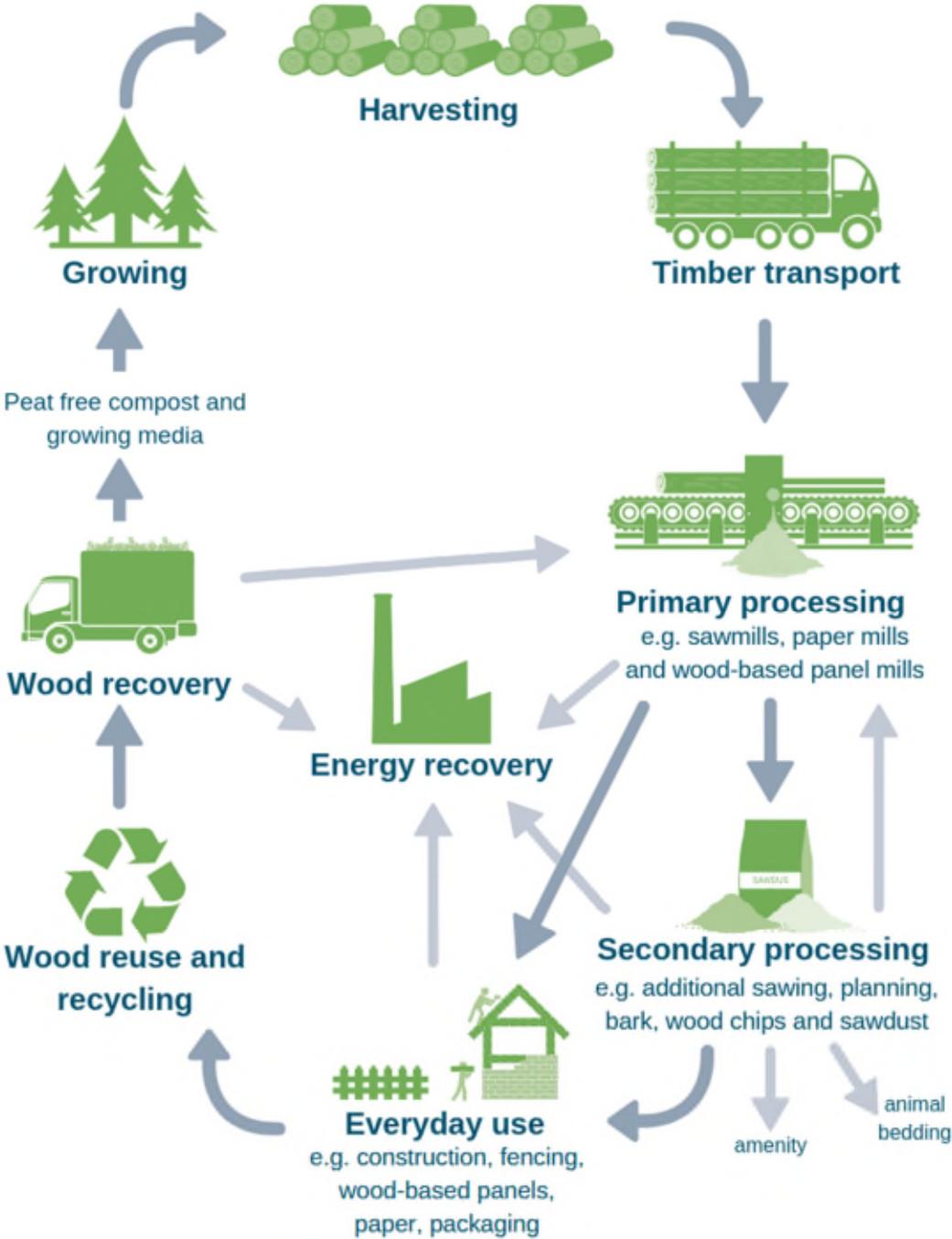


<sup>9</sup> <https://nationalperformance.gov.scot/>

# 4. The forestry and wood processing sector

This sector plan covers the full supply chain from planning through to planting, management and harvesting stages, on to processing and creation of wood products and finally, end-of-life considerations (Figure 5).

Forestry and wood processing sector plan supply chain (Figure 5)<sup>10</sup>

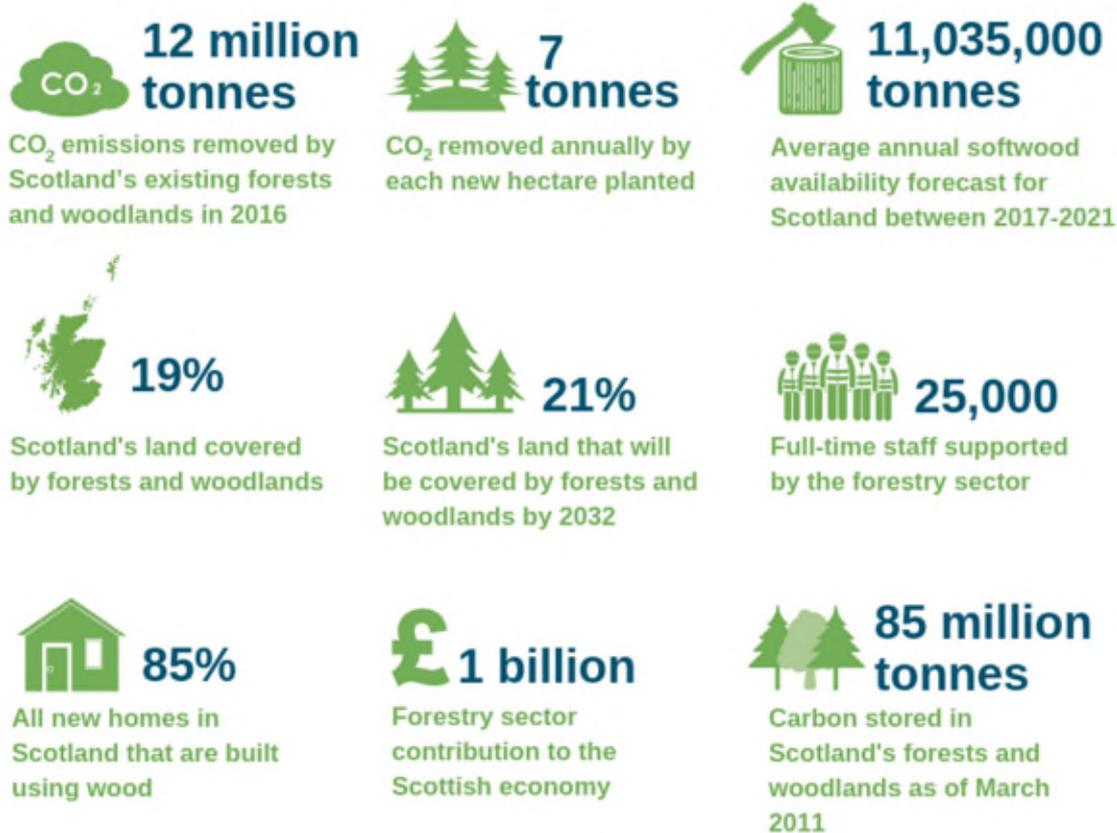


<sup>10</sup> Based on A.W. Jenkinson [wood cycle diagram](#)

**Forest and woodland creation and management**

Scotland's forests and woodlands cover 1.4 million hectares<sup>11</sup>, which is over 19% of the country. These forests and woodlands bring a range of benefits to communities, rural and urban economies, people's health and well-being, and the environment. In 2015, Scottish forestry contributed almost £1 billion gross value added (GVA) to the economy and employed over 25,000 full time employees<sup>12</sup>. Activities associated with woodland creation, management, harvesting and transport, as well as processing of wood products and forestry-related recreation and tourism, all contribute to these economic benefits.

**Facts and figures for the forestry and wood processing sector (Figure 6)**



Scottish Government proposals and targets for the sector include expanding Scotland's forest and woodlands to help fulfil climate change commitments. This

<sup>11</sup> [Forestry Statistics 2018](#)  
<sup>12</sup> [The economic contribution of the forestry sector in Scotland \(2015\)](#)

recognises that trees capture and store carbon, mitigating some of the impacts of climate change. The use of wood and wood products in construction is also associated with reduced greenhouse gas emissions compared to emissions in the production of alternatives such as steel and concrete.

Scottish Government targets and policies include:

- increasing the woodland creation target from the current 10,000 hectares a year to 15,000 hectares a year by 2024-2025;
- increasing the use of Scottish wood products in construction from 2.2 million m<sup>3</sup> to 3 million m<sup>3</sup> by 2031-2032;
- increasing the contribution of Scottish forestry, particularly new planting, to addressing climate change via increased carbon storage;
- policies such as the Scottish Government's Woodland Removal Policy that ensures appropriate replacement of woodlands that have been removed;
- delivering increased ecosystem services through Scotland's woodlands, such as natural flood management and enhanced biodiversity, for example through the aim of creating 3,000-5,000 hectares of new native woodland a year <sup>13,14</sup>.

Scotland's Forestry Strategy sets the strategic framework for sustainable modern forestry across the wood fibre supply chain and incorporates these proposals and targets. Its vision, objectives and priorities include:

- sustainable modern forestry;
- sustained woodland expansion;
- increasing the benefits of forestry to Scotland;
- promoting multi-purpose forestry and the sustainable management of forests and woodlands;
- a commitment to the right tree in the right place for the right purposes;
- integration of forestry with other land uses;
- improving efficiency and productivity, and developing markets.

---

<sup>13</sup> [Climate Change Plan: the third report on proposals and policies 2018-2032 \(February 2018\)](#)

<sup>14</sup> [Scotland's Biodiversity: a route map to 2020](#)

This sector plan incorporates these principles so that environmental compliance and moving beyond compliance are integrated and considered mainstream across the supply chain.

## **Transport**

Transport is a significant part of the supply chain; moving home-grown and imported timber from forests to sawmills, between processing sites and onto markets.

Scotland harvested nearly seven million green tonnes of softwood in 2017<sup>15</sup>, 62% of which came from timber growers in the private sector. However, Scotland imports significantly more wood products than it produces.

Timber miles and associated emissions, noise and disturbance are an important consideration for the sector, whether in terms of financial costs or environmental impacts, and measures to improve the sustainability of timber transport are led by the Timber Transport Forum<sup>16</sup>.

## **Wood processing**

Wood processing begins in the forest. After harvesting, timber (roundwood) is transported to processing facilities, which include sawmills, wood-based panel manufacturing plants, paper mills and biomass plants.

Sawmills produce sawn timber with the principal markets for Scottish softwood being construction, pallets and packaging, and fencing and garden products. In addition, the bark, wood chips and sawdust produced during primary processing provide the raw materials for a wide range of other products, including wood-based panel products; animal bedding; soil improvers and mulches; decorative, play and equestrian surfaces. Relatively small volumes of hardwood are processed in Scotland, often for niche markets and also for the wood energy sector.

Scottish sawmills produce about two million cubic metres of sawn timber per year and provide around 1,300 jobs<sup>17</sup>. Scottish softwood has significantly increased its share of the UK sawn softwood market in recent years, largely by import substitution.

---

<sup>15</sup> Table 2.2 and 2.3 Softwood removals [Forestry Statistics 2018](#)

<sup>16</sup> [Timber Transport Forum](#)

<sup>17</sup> [Forestry Statistics 2018](#)

Wood-based panel manufacturing includes the production of particleboard (wood chipboard), medium density fibreboard (MDF) and oriented strand board (OSB). In addition to the use of virgin wood fibre, this sector also recycles very substantial volumes of recovered waste wood fibre in the manufacture of particleboard.

Biomass plants are often co-located on wood processing sites to provide the heat and energy required to manufacture the wood products.

### **End-of-life**

At the end-of-life, there are still opportunities for timber to create value. Separate collections of waste wood from municipal and construction sources are widespread and less waste wood is disposed of to landfill than ever before.

Good quality timber can be recovered from the waste stream and be kept in use for longer through reuse, reclamation and 'upcycling'.

Waste wood can also be put to productive use. For example, high quality recycled wood is suitable for animal bedding and biomass fuel. Other grades are suitable for board manufacturing and energy production at permitted incineration facilities.

## 5. Potential environmental impacts and how they are managed

### Potential environmental impacts throughout the supply chain

#### Overview of environmental impacts associated with the forestry and wood processing sector (Figure 7)

##### Forestry and woodland ground preparation, planting, management, harvesting and restocking

- Impacts on water quality from diffuse pollution sources and peat disturbance.
- Impacts on water quality and soil from the management of brash and forestry residues.
- Impacts on soil, water and air quality from inappropriate application of pesticides.
- Impacts on soil quality, structure and functionality from poor site management.
- Impacts on biodiversity from poor habitat, harvesting regimes and chemical applications.
- Greenhouse gas emissions and impacts on air quality from forest machinery, peat disturbance and enhanced deposition of atmospheric pollutants to forest soils.
- Management of wastes on site e.g. old equipment and machinery, tyres, containers, bags and refuse.
- Impact on communities from noise and air quality through increased forestry vehicle use.

##### Transport and road construction

- Impacts on soil, water quality and quantity from forest roads due to logging, construction and site traffic.
- Impacts on water quality from quarrying activities.
- Impacts on drainage, water quality, channel form and fish migration due to poorly designed or maintained culverts and pipe bridges.
- Greenhouse gas emissions and impacts on air quality from the production and transport of raw materials and felled timber.

## Wood processing

- Impacts on water quantity and ecology from abstraction of water for use in paper and pulp production.
- Impacts on river ecology or groundwater from effluent discharges and accidental spillages.
- Impacts on soil and groundwater from on-site contamination.
- Greenhouse gas emissions from energy use at processing sites. For example, energy use for drying timber.
- Greenhouse gas emissions from product manufacture and transportation to market. Impacts on water, soils and air quality from the use of chemicals.
- Impacts on air quality through dust from the sawing, cutting, chipping of timber.
- Impact on nearby communities from noise, water quality and air quality.

## End-of-life management

- Impacts on soil and water quality from treated or contaminated wood being used, burnt or disposed of inappropriately.
- Greenhouse gas emissions and air pollution from the burning of wood.

### Consultation question 2

- (a) Do you think we have captured the main environmental risks and impacts of the sector in Figure 7?
- (b) Are there any other risks and impacts that should be included?

## Environmental benefits associated with the sector

- Forests can help mitigate climate change by reducing the amount of greenhouse gases in the atmosphere. They do this by absorbing carbon dioxide, using the carbon for tree growth and storing it in their leaves, wood and soil around them. Growing more trees will result in more carbon removal from the atmosphere.
- Forestry products represent a considerable carbon stock and wood products can substitute for other more fossil-fuel intensive materials.
- Woodlands can also help society adapt to a changing climate, by reducing the risk of flooding, providing shade for humans and wildlife, protecting land from winds and reducing soil erosion.
- Forests also have an increasingly important role as havens for wildlife and for the protection of endangered species of plants and animals.

Forests can also provide a number of social benefits. These include:

- Opportunities for employment in remote areas, helping diversify rural economies.
- Opportunities for physical activity in quiet, traffic-free areas for example walking and cycling. Exercise in woodlands has been shown to relieve physical symptoms of high blood pressure and obesity, improved mental health as well as symptoms of stress and depression.
- Locations for social and cultural events such as dog walking, forest schools, team-building events, art installations and concerts.<sup>18</sup>.

---

<sup>18</sup> [Forest Research](#)

## **Environmental regulation of forestry and wood processing sector**

SEPA has a number of regulatory responsibilities<sup>19</sup>, for example under the Pollution Prevention and Control (Scotland) Regulations 2012 (PPC Regulations), Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR), the EU Emissions Trading Scheme and Duty of Care. This regulatory work is supported by SEPA's partnership work, frameworks and by our role as a statutory planning consultee.

The basis for delivering effective environmental regulation begins at the planning stage. Good decision-making at this stage have positive outcomes for the next 40-50 years of a forest's growth cycle. We provide clear planning advice on regulatory compliance and achievement of beyond compliance objectives, supported by strong and consistent regulatory advice and robust, evidence-based scientific advice. This is achieved by forging effective partnership working with Scottish Forestry, the local authority planning departments and other statutory bodies such as Scottish Natural Heritage (SNH).

### **Forestry and wood processing**

Scottish Forestry is the main regulator for forestry activities - the first part of this sector plan's supply chain. However, we work in partnership with Scottish Forestry and require full compliance with water and waste environmental regulations.

The UK Forestry Standard (UKFS) sets out the UK governments' approach to sustainable forestry and is the industry reference standard for achieving sustainable forest management. It sets out standards and benchmarks for regulation and monitoring to ensure all forestry activities fully comply with the relevant legislative rules and regulations. If practitioners meet the UKFS requirements it demonstrates that forestry operations and activities are both legally compliant and sustainable. SEPA's regulatory interests for the protection of the water environment are contained within the UKFS.

The UK Woodland Assurance Standard (UKWAS) provides the basis for independent forest certification. It combines UKFS and the requirements of both major

---

<sup>19</sup> <https://www.netregs.org.uk>

international certification schemes used in the UK; the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). UKWAS is managed by a partnership of organisations, independent of government. Forest owners choose to have their forests certified to provide assurances of high management standards and environmental compliance, allowing access to FSC and PEFC labelling on their wood products.

CAR applies to forestry activities such as cultivation, surface water drainage systems, fertiliser and chemical storage and application, oil storage, and engineering activities. Many of the controls are through General Binding Rules (GBRs)<sup>20</sup> that provide statutory controls over low risk activities. CAR was developed under the Water Environment and Water Services (Scotland) Act 2003 (WEWS) as part of the implementation of the European Water Framework Directive, which also requires the production of river basin management plans (RBMP). Both SEPA and Scottish Forestry have a statutory duty under WEWS to secure compliance with the Water Framework Directive.

Waste arisings must comply with the Waste Management Licensing Regulations (WML) and Environmental Protection Act (EPA) to ensure items such as abandoned equipment and machinery, tyres, plastics (including spent tree guards and planting bags), containers and refuse are properly collected and disposed of to a licenced site.

If we find breaches of environmental controls, we will investigate and take appropriate enforcement action to resolve the issue and report findings to Scottish Forestry. In certain instances, we will carry out joint audit inspections.

### **Timber transport**

For transportation within this sector, the environment is regulated indirectly. Responsibility for the public road network, including bridges and drainage, lies with local authorities under the Roads (Scotland) Act 1984 (trunk roads are covered by Transport Scotland). This gives powers to apply certain regulations, restrictions and limits through Traffic Regulation Orders. Weight limits, for example, can be

---

<sup>20</sup> [Information on GBRs](#)

introduced where there are risks that lorries could damage weak rural roads, causing erosion, silt water runoff and water quality issues. In addition, the emissions of greenhouse gases and other air pollutants from timber vehicles can be 35% higher on forest roads compared to public roads due to slower speeds, road slope and loaded vehicle fuel performance<sup>21</sup>.

The Timber Transport Forum, together with other partners, have put together the Road Haulage of Round Timber code of practice<sup>22</sup>, which sets standards on legal and technical haulage issues. Although it has no legal status, the Code of Practice promotes good practice and covers a wide range of issues from vehicle specifications, loading and unloading of timber and the road network itself, all to develop and improve efficiency, safety and environmental compliance.

## **Wood processing**

Wood processing sites such as sawmills, pulp and paper mills, wood-based panel mills, timber treatment, and combustion (biomass) sites fall under a number of SEPA's regimes, such as:

- PPC if specific parameters exceed a certain tonnage, volume, threshold or output;
- Environmental Protection Act 1990 and Waste Management Licensing (Scotland) Regulations 2011, for example where wood is bulked up or reprocessed for secondary products;
- CAR covers associated water treatment and discharge facilities;
- Greenhouse Gas Emission Trading Scheme Regulations 2012 (Amended) relates to combustion sources producing carbon dioxide emissions. It allows the flexibility to cut emissions in the most economical way and promotes investment in clean, low carbon technologies;
- Carbon Reduction Commitment (CRC) and the Energy Savings Opportunity Scheme Regulations (ESOS) are designed to improve energy efficiency and cut carbon dioxide (CO<sub>2</sub>) emissions.

---

<sup>21</sup> [Understanding the Carbon Footprint of Timber Transport in the UK, 2010](#)

<sup>22</sup> [Road Haulage Round Timber Code of Practice](#)

An area of concern within the sector relates to timber treatment installations and the calculation of daily volumetric treatment capacity for PPC permitting purposes. We have published supporting guidance to provide a clear and consistent message and we will continue our engagement with stakeholders.

Recent changes to the Medium Combustion Plant Directive require combustion activities with thermal input at or above 1 MWth to be subject to new controls. This is covered through PPC and new guidance for operators has been published.

### **EU exit**

Around 80% of environmental legislation in Scotland originates from the European Union. As the UK leaves the EU, environmental legislation is being corrected to make sure the law keeps working as it has been to ensure that the standards of environmental protection we enjoy today, and the principles upon which they are based, are maintained. Therefore, while some of the detail of the legislation we use to regulate may change, our work to protect Scotland's environment will not. Our commitment to tackling non-compliance and to work with as many businesses as possible to help them to go further will not diminish as a result of the UK leaving the EU.

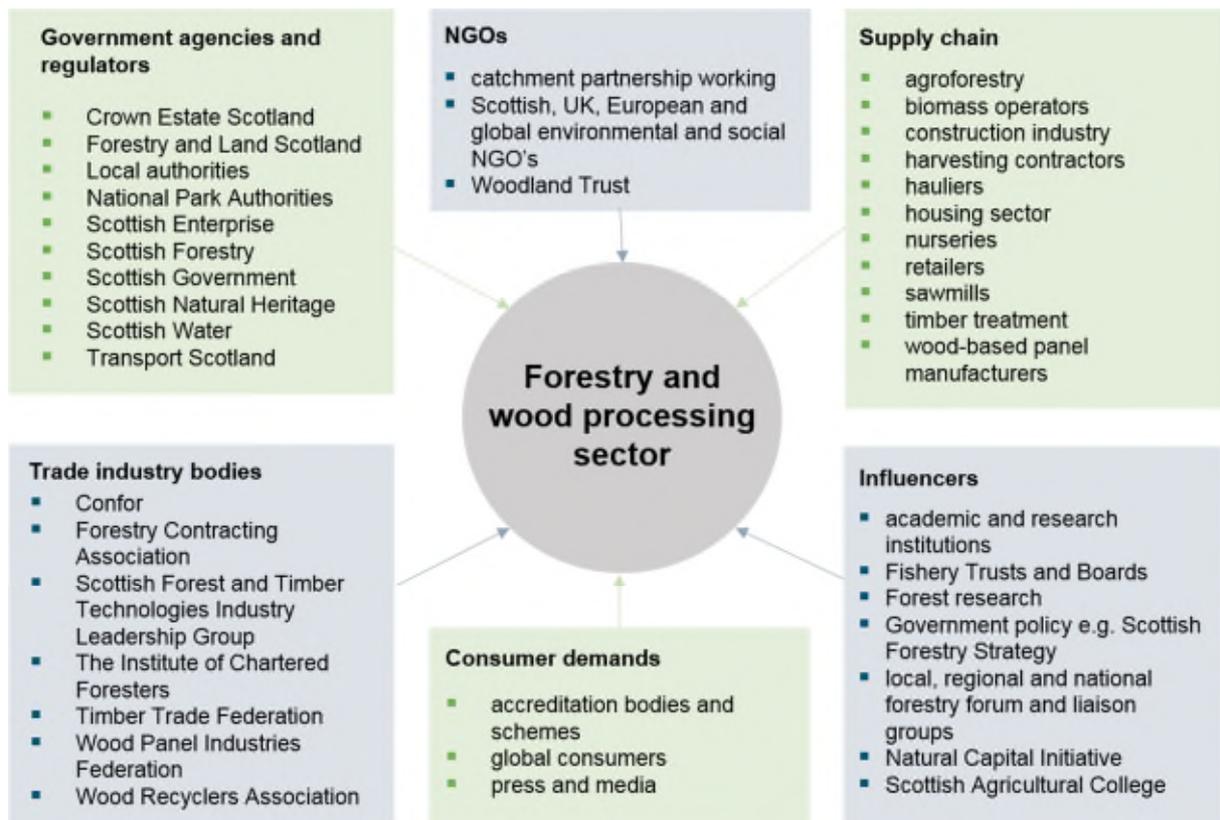
## **Wider influences on environmental performance of the forestry and wood processing sector**

Full compliance with environmental regulations will not, by itself deliver the transformational change required to secure our One Planet Prosperity objectives. The forestry and wood processing sector plan needs to maximise the potential for business to gain strengths in resource efficiency and environmental innovation that will help them to continue to succeed in their markets.

To secure full compliance and help as many businesses as possible to move beyond compliance we will develop our relationships with partners and other stakeholders.

Figure 8 summarises the main organisations that influence and are influenced by operators in the forestry and wood processing sector. It also identifies those that we may work with in both the short and longer term. As we implement the plan we will consider the opportunities these relationships provide and how we would like them to develop.

### Key influences on the forestry and wood processing sector (Figure 8)



### Consultation question 3

- Have we identified all the main influences for this sector in Figure 8?
- Are there other influences that you think should be included?
- Please tell us about any relationships you have with any of the influences that we might be able to use to help implement the sector plan.

## 6. Tackling non-compliance and taking opportunities to go beyond

**Compliance<sup>23</sup> with environmental law is non-negotiable and regulated businesses in the sector need to comply.**

---

### **Compliance in the sector**

We will help responsible compliant businesses to operate by making it significantly harder and more expensive for those who persistently fail to comply with environmental regulation to operate. We will achieve this by increasing scrutiny, prescription, fees and the use of enforcement and monetary penalties for those who fail to comply.

### **Forest operations**

SEPA ran a Forestry Inspection Project in south Scotland from 2014-2015 to conduct detailed audit inspections of forestry sites. The project covered audits of harvesting, planting, ground preparation, quarrying, road infrastructure and waste arisings to check compliance with UKFS with the focus on CAR and WML regulations<sup>24</sup>.

74% of the 219 forestry sites that were inspected were fully compliant with the CAR GBRs contained within the UKFS, with many operators demonstrating excellent site management beyond standard compliance.

The key issues contributing to the 26% of non-compliant sites included:

- poor cultivation – a breach of GBR 20;
- land and road drains carrying pollution to watercourses – a breach of GBR 21;
- forest road runoff causing water quality issues – a breach of GBR 22.

---

<sup>23</sup> Compliance with environmental authorisations is currently measured by our Compliance Assessment Scheme (CAS). This scheme is currently being reviewed.

<sup>24</sup> SEPA accepted old forestry drains would not comply with current GBRs therefore these were not audited. However pollution events arising from old drains which received no mitigation management during harvesting were included

Most non-compliance centred on heavy machinery working on difficult terrain. Often there is limited ground vegetation cover binding the soil which, combined with steep slopes and high rainfall, are factors that increase the risk of silt water runoff to rivers. Heavy vehicle movement along forest tracks also generates silt water runoff into roadside drains directly connected into watercourses.

### **How will we work with the forestry sector to address these issues?**

Following this inspection project, we have improved communication and partnership working with Scottish Forestry and many operators in the forestry sector to promote environmental compliance and ensure the UKFS are met at all sites. This has been achieved through supporting the Forestry and Water Scotland (FWS) Group, which has focussed on developing information tools to improve attitudes and behaviours of contractors, supervisors, managers and landowners that ultimately improve corporate culture and environmental responsibility within a company. Such tools include good practice booklets, stickers, videos, factsheets, bulletins and media releases all placed on the FWS web platform for easy access. In addition, extensive workshop style training has been rolled out across Scotland to promote the good forestry practice message.

SEPA will:

- work with Scottish Forestry to update our memorandum of understanding protocol to reflect recent government forestry organisational changes and the content of the Scotland's Forestry Strategy, and to clarify roles and responsibilities in achieving and regulating environmental compliance;
- continue and expand local, regional and national liaison meetings with Scottish Forestry and Forestry and Land Scotland to discuss policy and operational matters;
- identify opportunities to engage regularly with Confor and private sector companies;
- continue supporting the FWS group to produce simplified guidance on operational issues and deliver good forestry practices;
- provide input to factsheets on key areas such as chemical applications and management, private water supplies and operational guidance;

- contribute further to information tools such as video productions and Toolbox Talks showcasing good forestry practices;
- promote sustainable forestry and good practice guidance with our partners via roadshows, workshops and open days;
- build on the Tilhill Forestry Initiative to promote good practice and compliance with regulatory requirements through focussed operator and management training courses;
- re-run the SEPA Forestry Inspection Project to measure the success of the improved guidance, workshops, factsheets and videos in terms of site compliance;
- coordinate regular GBR compliance spot checks to ensure all forestry operators and businesses comply with regulations;
- work in partnership with the Scottish Forestry and Scottish Government to review the diffuse pollution GBRs and guidance that relate to forestry activities.

## Case study: Tilhill Forestry Initiative

The Tilhill Forestry Initiative was started in 2013 with the aim of rolling out workshop-style training for contractors and managers. To date approximately 800 people have been trained on good environmental practices across the UK (Figure 9). The initiative includes reviewing company staff bulletins, factsheets and assisting in the production of a new information package and training video for company contractors, which is due for completion in 2019. This will take workshop training to people based remotely and enable companies to train their staff in the workplace.

We have also assisted government agencies and other private companies deliver similar workshop training events, and attended national symposia and trade events to deliver our environmental compliance message.

The sector has reacted positively to our inspection findings that demonstrate the need to improve forestry practices. The aim of the partnership training approach is to ensure consistency across the sector. This will promote Scottish wood as an environmentally sustainable, quality product grown and felled in compliance with environmental controls.

Forestry training event to date (Figure 9)



## Wood processing

Figure 10 shows the location of regulated processing sites across Scotland.

---

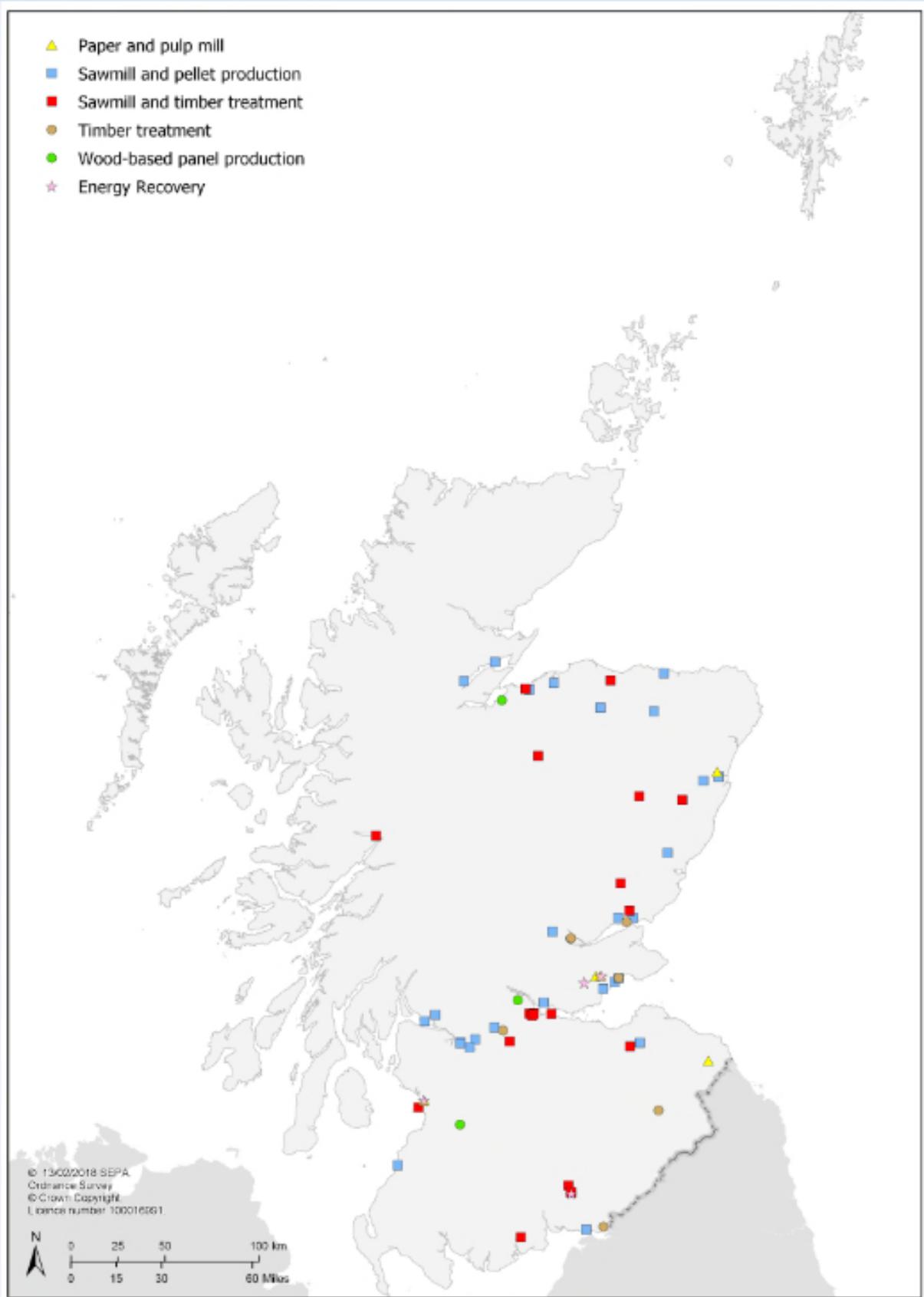
<b>Wood-based panel manufacturing</b>	There are three PPC Part A sites for wood-based panel manufacturing in Scotland producing MDF (medium density fibreboard), OSB (orientated strand board) and particle board (wood chipboard).
<b>Paper and pulp manufacturing</b>	There are four PPC Part A paper mills. Only one site is an integrated paper mill, utilising Scottish conifer trees to produce pulp to make coated magazine papers.
<b>Sawmills</b>	There are 41 PPC Part B sites in Scotland. Most sawmills process coniferous trees and many include processes to reduce the moisture content of the wood (kiln drying). In addition to a range of sawn timber products, sawmills also produce sawdust, wood chips and bark, which are used in the manufacture of other products. A proportion of these sawmill products may be used in on-site biomass installations, with the heat used for kiln drying.
<b>Timber treatment</b>	There are 28 PPC Part A sites that treat timber with a number of chemicals to ensure the product is resistant to decay and insects. The timber is then utilised for a range of uses such as fencing and construction.
<b>Energy recovery</b>	There are four PPC Part A biomass facilities authorised to accept virgin and waste wood for energy recovery.

---

For smaller sites only using virgin wood, we issued new guidance in July 2018 on the regulation of medium combustion plants for sites that operate combustion plants in the 1 to 20 MW range. The sector plan actions highlight this lower threshold tier to ensure that sites apply for the appropriate operational permit.

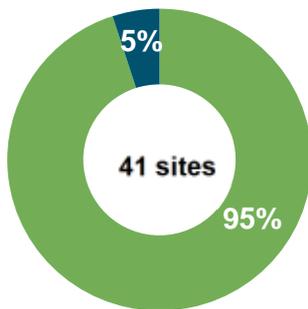
Reported compliance for the five wood processing regulated activities is shown in Figure 11.

Regulated processing sites across Scotland (Figure 10)



## Reported compliance 2017 for wood processing activities (Figure 11)<sup>25</sup>

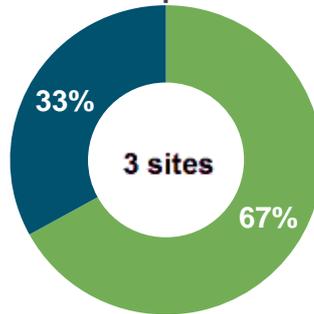
### Sawmills



Non-compliance due to:

- Inadequate dust suppression equipment resulting in fugitive dust release
- Not reporting incidents to SEPA as required by the authorisation

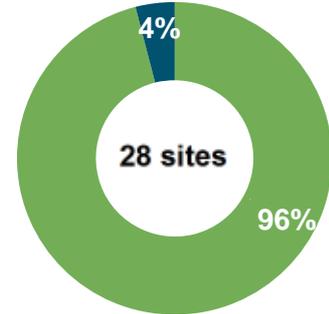
### Wood-based panels



Non-compliance due to:

- Poor storage of materials on site
- Air emission breaches arising from inadequate abatement of spent process air and combustion gases
- Noise disturbance from on-site equipment and machinery, causing community complaints

### Timber treatment



Non-compliance due to:

- Lack of soil and groundwater monitoring plans and associated non-reporting of these plans and associated incidents to SEPA

### Pulp/Paper



### Energy recovery



### SEPA average CAS licences 2017



<sup>25</sup> SEPA average data calculated from across SEPA's [Compliance Assessment Scheme](#)

## **How will we work with the wood processing sector to address these issues?**

SEPA will:

- target our regulatory effort to bring non-compliant sites up to full compliance as quickly as possible, including taking regulatory action to address breaches of environmental standards;
- engage with senior management at processing sites to help businesses recognise the value of improved compliance and community engagement;
- promote new guidance for medium-sized combustion plants with thermal input at or above 1 MWth;
- target specific unlicensed timber treatment sites for inspection to verify capacity and assess if a PPC permit is required. For sites not needing a permit, we will ensure environmental compliance with other regulatory controls is being achieved;
- review the applicability of environmental management systems and regulations for biomass installations with partners to ensure clarity and consistency.

## **Where are the opportunities to go further?**

We believe that those societies and economies that are low resource use, low energy use, low water use and low waste will be the most successful in the 21st century. Businesses that are the most innovative will best rise to the challenges of our time, such as over use of resources and climate change and create sustainable economic growth.

In this section we describe opportunities and our aspirations to help businesses do more for the environment by building upon current good practices and choosing to move beyond compliance; because it makes sense for them to grow in a sustainable manner. Many of these opportunities will also help to improve compliance by businesses in the forestry and wood processing sector.

## Water

**Water in the right place, in the right amount and of the right quality underpins Scotland's society and economy. Our water environment provides us with vital supplies for drinking and food production; supports business, industry and tourism; maintains places that benefit the health and wellbeing of communities and sustains wildlife.**

**Our sector plans aim to ensure we live and prosper within our environmental water limits; maximising the efficiency of its use; reducing the input of waste; creating better places for people to thrive and protecting and restoring habitats for wildlife. By doing so, our plans will support and complement the ambitious targets set out in Scotland's river basin management plans (RBMPs) and flood risk management plans (FRMPs).**

---

SEPA is committed to reducing the impacts of flooding. We have a central role in identifying and promoting the most sustainable actions to help deliver a flood resilient Scotland. We are developing a flood strategy that describes how we will work with partners to manage flood risk now and in the future. SEPA will continue to promote avoidance of flood risk as the priority. If risk can't be avoided then adaptation and defence is key. Where it is not possible to completely avoid or eliminate the flood risk then SEPA will give communities and emergency responders advance notice of flooding to help them prepare and protect themselves. To understand areas at greatest flood risk SEPA will use the best available evidence. SEPA will continue to work with partners to improve Scotland's FRMPs. Early and strong links between this sector plan and flooding will strengthen opportunities and necessitate engagement and communication between key partners.

Water is essential for forestry to grow high value timber. Appropriate ground preparation techniques tied in with species selection and good soil management allow rainwater to percolate to sapling roots uninhibited; this encourages good tree growth and a healthy crop production. For processing sites such as pulp and paper mills, a sustainable reliable water supply is essential for production.

SEPA's aspirations are:

- continue working in partnership with Scottish Forestry, across businesses and operators in the forestry sector to encourage aspects of UKFS that go beyond compliance, actively promoting and encouraging adoption through training and guidance;
- work with Scottish Forestry, SNH and fisheries trusts to deliver actions laid out in the RBMPs and to identify further opportunities to protect and restore soils, deep peat and the water environment;
- continue to collaborate on current research projects with Forest Research such as forestry mulching practices and application of fertilisers, land use change, and explore other opportunities related to shared goals;
- continue the ongoing work with Scottish Forestry on flood risk management strategies and opportunity mapping as a way of using tree planting to improve water quality, the management of high and low river flows, soil and peatland protection, surface water drainage and the restoration of urban rivers;
- review our engagement with the planning system to streamline forestry consultations and ensure we deliver advice and guidance to our partners that supports our vision;
- work in partnership with Scottish Water through our Water supply and waste water sector plan to identify sensitive water supply catchment areas where forestry can protect and enhance the quality of drinking water sources;
- work closely with our Housing and Strategic infrastructure sector plans to explore opportunities and benefits of trees in urban spaces;
- work in partnership across the supply chain to support the sector in becoming resilient to climatic changes, especially around flood risk and water scarcity issues;

- recognise those processing sites currently delivering world-class practices in water management, and encouraging those that do not, to use water efficiently, recirculate water and reduce wastage.

### Case study: Strathard Partnership Initiative



We have facilitated specific partnerships between agencies, landowners and communities in the Strathard catchment that is located within the Loch Lomond and Trossachs National Park. The initiative aimed to improve land, forest and water management decisions using an ecosystems approach. By working in close partnership, multiple land management, community and environmental objectives were achieved. The successes of this regional initiative that showcase the benefits of effective partnership working can be used as an exemplar for rolling out across Scotland.

## Energy

**Energy is an essential resource that enables social and economic development and is one of the most important aspects of the transition to a sustainable low carbon economy. However, electricity and heat production, transmission, storage, and use can have significant environmental impacts. SEPA's Energy Framework<sup>26</sup> recognises that how we use and manage our energy resources is central to our ability to live within the resources of our planet. Cost savings and other benefits for businesses can be made by improving energy efficiency and making use of low carbon sources of energy.**

---

SEPA's aspirations are:

- work with Scottish and regional timber transport fora, local authorities, operators and agencies on research and innovation to reduce the impacts of transport across the sector and ensure forestry activities are meeting requirements contained within the Clean Air For Scotland (CAFS) Strategy<sup>27</sup> and climate change plan;
- understand the key energy requirements within the sector, for example, wood drying and product processing, and support the sector in identifying and implementing energy efficiency opportunities and sourcing alternative low carbon energy sources;
- investigate helping facilitate cooperation between processing and harvesting hauliers to reduce timber miles;
- promote one planet prosperity to encourage innovation and identify energy efficiency opportunities across the whole supply chain;
- continue to offer technical advice and working with partners to identify beyond compliance opportunities associated with the Energy Savings Opportunity Scheme (ESOS) and the Emissions Trading Scheme (ETS);

---

<sup>26</sup> [https://www.sepa.org.uk/media/383806/sepa\\_energy\\_framework.pdf](https://www.sepa.org.uk/media/383806/sepa_energy_framework.pdf)

<sup>27</sup> <https://www2.gov.scot/Resource/0048/00488493.pdf>

- in conjunction with our Housing and Strategic infrastructure sector plans, explore improved ways of engagement with partners, operators and planners to encourage the use of combined heat and power schemes for local district heating schemes and other opportunities such as greenhouse-based agriculture, where appropriate.

### **Case study: Timber Transport Forum agreed route maps**

The Timber Transport Forum works in partnership with community representatives and the forest and timber industries to promote a vibrant and sustainable timber transport sector. One focus is to minimise the impact of timber transport on the public road network, on local communities and on the environment.

Agreed route maps are at the heart of this partnership approach to timber transport, developed by the Regional Timber Transport Groups at local authority level. Where timber haulage may cause significant impact on the road itself, to communities or to other road users, liaison between forestry interests and the roads authority allows options and solutions to be developed to address any issues. Agreed routes maps have been prepared for most of the forested areas of Scotland<sup>28</sup>. These outline roads that are restriction-free, those that have restrictions such as allowable tonnage or timings, and roads that are not permitted for timber transport.

---

<sup>28</sup> [Agreed Route Maps](#)

### **Case study: Alternative Timber Haulage Initiative**

One of the largest forestry businesses in the UK, in conjunction with its transport partner, has successfully implemented shipping to transport wood products from north-west Scotland to its hub in Cumbria. As a result of this initiative, road miles have been reduced by 658,000 kilometres and carbon emissions by 668 tonnes per year. Knock-on benefits include local haulage companies being able to return from delivering goods to the Workington port in Cumbria fully loaded with wood products.



## Materials

**SEPA views the circular economy as a game-changing opportunity to manage resources within planetary limits. Our Waste to Resources Framework<sup>29</sup> recognises that reducing the harms associated with waste management can create economic opportunities. We must dramatically cut waste production across the economy, recover more and dispose of only the very minimum. If waste is produced, we will encourage its productive use within a framework of strong environmental protection.**

---

Resource efficiency can improve productivity and reduce costs for business. It can also bring environmental improvements.

SEPA's aspirations are:

- work with businesses to employ the waste hierarchy at all sites so materials are re-used or recycled on site. Only when on-site options are exhausted should materials be transported for reuse or recycling off-site. Wood products should be in circulation as long as possible before reaching end of life uses;
- work with the sector to increase the volume of sustainable Scottish timber used in construction;
- work with the sector to promote the benefits of certification to others;
- work in partnership to promote the Natural Capital Protocol<sup>30</sup> within the sector;
- work with operators to expand the use of appropriate abatement equipment for collecting and removing dust and reducing noise;
- continue collaborative objective-led research and development between SEPA and Forest Research on fertiliser applications and brash management, and identify further projects and research partners for the future;

---

<sup>29</sup> <https://www.sepa.org.uk/media/219528/one-planet-prosperity-a-waste-to-resources-framework.pdf>

<sup>30</sup> <https://naturalcapitalcoalition.org/natural-capital-protocol/forest-products/>

- continue to contribute to revising guidance on classification of waste wood with the Environment Agency and Wood Recyclers Association;
- further investigate the use and its associated environmental risks of waste wood for animal bedding, with a view to developing policy and guidance.

### **Case study: Wood for Good**

Wood for Good<sup>31</sup> is the timber industry's campaign to promote the use of wood in design and construction. Wood is nature's most versatile building material and modern engineering methods expand possibilities for its application beyond traditional uses. The objective of Wood for Good is to make wood a first choice material for specifiers and designers by demonstrating the multiple uses of wood.

---

<sup>31</sup> <https://woodforgood.com/>

### **Case study: Integrated timber processing facility**

At Steven's Croft, near Lockerbie in south Scotland, three timber processing companies and one energy company work together to process UKWAS-compliant saw-logs, small roundwood and recycled wood fibre. Utilising the extensive network of strategic timber haulage routes, more than one million tonnes of wood are processed annually and the site is a major employer in the region.

Applying world-class manufacturing technology, 100% of the roundwood is used resulting in zero wood waste. Sawn timber and associated sawmill products (sawdust, wood chips and bark) are produced for a variety of UK markets. Some of the sawmill products are also combusted on-site along with recycled wood fibre, to produce 45MW of green energy that is exported to the grid. Heat produced during combustion is used within a pressurised water heating system to kiln-dry timber, saving around 15,000 tonnes of carbon per annum.

An on-site sustainable drainage system and oil separators help remove pollutants and slow down run-off. These link to an adjacent wetland system that accommodates all site storm water and ensures peak flows are attenuated during storm events.



# 7. Summary of actions and aspirations

The following table summarises the actions that we have described in previous sections to address non-compliance in the sector, aspirations to help businesses take opportunities to go beyond compliance and areas where we can exert influence and specialist input. These are described according to the key outcomes introduced in Section 3 that we would like to achieve for this sector.

The table combines actions to address compliance and to help achieve beyond compliance. This is to illustrate that the same action can often both improve compliance and help a business to move beyond compliance. Similarly, actions that businesses choose to take to move beyond compliance can improve their compliance with environmental regulations.

We will prioritise them alongside those in other sector plans and progress powerful actions that contribute towards achieving our One Planet Prosperity goal for Scotland.

Better environment	
Outcome sought	Actions and engagement
Environmental pollution risks are being avoided or controlled at source wherever possible.	<ul style="list-style-type: none"> <li>■ We will review our engagement with the planning system to streamline forestry consultations and ensure we deliver advice and guidance that reflects one planet principles and dovetails with the Scottish Forestry Strategy, UKFS and Scottish Forestry advice and guidance.</li> <li>■ We will continue to support training and work with Scottish Forestry to promote good practice and compliance with regulatory requirements across the forestry sector through training courses, guidance, factsheets, video productions and workshop events.</li> </ul>

	<ul style="list-style-type: none"> <li>■ We will continue to support the work of the FWS working group with Scottish Forestry, Scottish Government, Confor, Forestry Contracting Association and Scottish Water.</li> <li>■ We will contribute to ongoing research and innovation in managing chemicals and the use of brush in soil resource protection.</li> <li>■ We will offer evidence and advice at all stages in the supply chain to ensure environmental strategies and initiatives are supported.</li> </ul>
<p>Full compliance and stronger environmental performance is achieved across the sector and good practice following UKFS guidelines is rewarded.</p>	<ul style="list-style-type: none"> <li>■ We will work in partnership with Scottish Forestry and the Scottish Government to review the diffuse pollution GBRs and guidance that relate to forestry activities.</li> <li>■ We will coordinate regular GBR compliance checks to ensure all forestry operators and businesses comply with regulations.</li> <li>■ We will explore with others how accreditation and certification bodies could be used to reward environmental excellence across the supply chain.</li> <li>■ We will engage with senior management at processing sites to help businesses recognise the value of improved compliance and community engagement.</li> <li>■ By 2020, we will target specific unlicensed timber treatment sites for inspection to verify capacity and assess if a PPC permit is required. For sites that don't require a permit, we will ensure compliance with other environmental controls is being achieved.</li> </ul>

	<ul style="list-style-type: none"> <li>■ We will fully implement the medium combustion plant directive and ensure best practice is followed at all sites with regulatory changes implemented in a phased manner.</li> <li>■ We will explore improved ways of engagement with operators and planners to use, where appropriate, heat from biomass combustion plants.</li> <li>■ We will review the applicability of environmental management systems for biomass installations to ensure clarity and consistency.</li> <li>■ We will further investigate the use and associated risks of waste wood for animal bedding with a view to developing policy and guidance.</li> </ul>
<b>Stronger business</b>	
<p>Scotland has a resilient, multi-benefit, sustainable forestry and woodland sector that plays a significant role in climate change mitigation.</p>	<ul style="list-style-type: none"> <li>■ We will support Scottish Government, Scottish Forestry, Forest Research, Confor, accreditation bodies, trade associations, businesses, local authorities and organisations, and provide specialist evidence and advice, to assist the sector.</li> <li>■ We will assist Scottish Government and Scottish Forestry to deliver the vision, aims and priorities of the Scottish Forestry Strategy including: <ul style="list-style-type: none"> <li>■ preparing for future challenges from climate change, pests and diseases;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>■ delivering multi-benefit, sustainable forests and woodlands in the context of the right tree in the right place for the right purposes through integrated land management, opportunity mapping, natural capital considerations, protection of soils, protection and restoration of peatlands, and effective forestry planning.</li> <li>■ We will investigate planting trees to offset emissions from SEPA's business mileage.</li> </ul>
<p>Going beyond compliance and incorporating circular economy solutions helps deliver business success.</p>	<ul style="list-style-type: none"> <li>■ We will work with Scottish Government and operators to develop and enhance circular economy solutions that keep wood products in circulation as long as possible before reaching end-of-life uses.</li> <li>■ We will work with the sector to promote the benefits of certification to others.</li> <li>■ We will work across the supply chain to minimise transport and associated noise, fuel use and emissions.</li> <li>■ We will promote technological innovation and efficient use of all resources throughout the supply chain.</li> <li>■ We will work across the sector to identify opportunities to identify further opportunities to minimise environmental impacts associated with water, waste and energy use.</li> </ul>

<b>Protected communities</b>	
Compliant businesses and operators are flourishing and providing opportunities within local communities	<ul style="list-style-type: none"> <li>■ We will update our memorandum of understanding with Scottish Forestry to reflect recent government department changes as set out within the Forest and Land Management (Scotland) Act 2018 and the Scottish Forestry Strategy, to clarify roles and responsibilities in achieving environmental compliance.</li> <li>■ We will consider forest and woodland creation opportunities across all SEPA's sector plans and initiatives such as development on vacant and derelict land, to maximise multiple benefits and opportunities.</li> </ul>
Stakeholders, communities and operators work in partnership for multi-benefit outcomes	<ul style="list-style-type: none"> <li>■ We will continue working in partnership with communities, stakeholders and operators to encourage involvement and opportunities at all stages in the supply chain for multi-benefit outcomes.</li> </ul>

#### **Consultation question 4**

- (a) Have we identified all the actions we should take to solve compliance issues in the sector?
- (b) Are there other actions that you think we should be taking to improve compliance?

**Consultation question 5**

- (a) Have we identified the right opportunities we could take to help businesses to go beyond compliance?
- (b) Please tell us about any other opportunities that you think could be included to help business in this sector to move beyond compliance?

**Consultation question 6**

- (a) Do you think the actions are ambitious enough?
- (b) Which of the actions and aspirations proposed in this plan do you consider to be of the highest priority?

[www.sepa.org.uk](http://www.sepa.org.uk)  
03000 996699  
Strathallan House, The Castle Business Park,  
Stirling FK9 4TZ

