

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents around 6,300 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience.

## **Standard Rules No 14 – Land Spreading, Digestate Storage and Deposit for Recovery**

CIWM welcomes the opportunity to comment on this consultation and sought comment from its special interest group on Biological Treatment, whose feedback has helped form this response.

### **Land spreading and digestate storage**

**Question one:** *Have we correctly identified all the risks for each activity, as described in the generic risk assessments associated with the consultation?*

CIWM is not aware of any other aspects that need to be considered in the generic risk assessments.

**Question two:** *Do you consider that reducing the storage period allowed in mobile plant standard rules from 12 months to 6 months will be effective in stimulating investment in contingency storage facilities and lead to greater business resilience.*

CIWM is aware of the reasons for reducing the storage time for mobile plant standard rules. Increased weather changes must be considered the norm with climate change having its effect in a number of different ways. Because of this the biological industry must look at how it operates and accommodates such changes now and in the future. This reduction should lead to more appropriate storage for contingency. CIWM is aware that some of its members see such a reduction as a negative impact on their business and this may well be the case but having no market and no landbank to spread material produced from biological treatment will also have a negative impact on business.

**Question three:** *Can you suggest other wastes that could be suitable for inclusion in these standard rules.*

CIWM is not aware of any other wastes that might be suitable for inclusion.

**Question four:** *Do the codes and descriptions for ashes cover the range of waste ashes being spread on land?*

CIWM does not have any particular comment to add.

**Question five:** *What would be your preferred method for pre-notifying us of the intention to commence spreading operations?*

Pre-notification should be as flexible as possible. Phoning, texting and emailing should all be allowed, along with any on-line or written communication method.

**Question six:** *For deployments of up to 100 hectares how would you prefer the standard rules to define 'continuously managed area of land'?*

Single Business Identifier (SBI) number with land parcels falling within a 10 mile radius of each other.

**Question seven:** *We consider that taken as a whole the package of proposals described here will not have a significant financial impact on the wider business community. If you agree or disagree, please explain why, and provide evidence to support your view of the likely impacts.*

CIWM understands there are likely to be some financial impact regarding the provision of contingency storage and fully appreciates the reason for the change in waste allowed under the standard rules – to protect the environment from pollution incidents.

**Question eight:** *Please tell us if you have any other views or comments on these proposed revisions that have not been covered by previous questions.*

These proposals to reduce any adverse environmental impacts associated with landspreading should be welcomed. However, CIWM is concerned the Environment Agency may not have sufficient resources to adequately enforce them, this should be addressed.

Changes to standard rules could have unintended consequences – the change to the spreading area covered by a single deployment might make PAS certification less attractive. On the other hand, the change to storage could make PAS certification more attractive. This could lead to greater volumes of material being stored for long periods prior to use – which isn't necessarily desirable. Regulatory changes relating to spreading near sensitive receptors (e.g. boreholes) could also encourage greater uptake of PAS, where spreading becomes a matter of good practice, rather than regulation. Unless there's a pollution incident – which doesn't do the industry any favours.

Typographical errors:

#### **SR 2010 No 4**

SR2010 No 4 v4 – the introduction still has the watercourse information, which has now been moved in to the main standard rule, see Standard Rules No 12 consultation.

Paragraph 1.2.1 – the sub-paragraph text needs to be indented, see paragraph 1.1.1 above.

Table 2.1 – there needs to be consistency on use of full stops. There is one on R13 but not R10.

Table 2.1 – in the generic risk assessment there is the use of liquid (non-stackable) – CIWM suggests that one particular phrase is used for both and prefers the one used in Parameter 4 of GRA 2010 No 4 v4.

Table 2.1 – the tonnages are not all formatted the same, most have no commas but the tonnage for sugar beet does. This needs to be consistent.

Paragraph 2.1.2 – sub-paragraph b) has an extra space before the text that needs to be removed and the text indented like 1.1.1.

Paragraph 2.1.7 – instead of a semi-colon at the end of sub-paragraph b) there should be a full stop.

Paragraph 2.1.8 – there is no full stop at the end of the sentence.

Table 2.2A – the title should have Types with lower case t.

Table 2.2A – 020101 – Soils should be lower case s.

Table 2.2A – 020305 – Effluent should be lower case e.

Table 2.2B – the title should have Types in lower case.

Table 2.2B – 100105 and 100107 – Flue should be lower case f.

Table 2.2B – 191212 – Recycled should be lower case r.

Table 2.3 – This needs a heading! Operating techniques

Table 2.3 point 1 – CIWM suggests adding “All liquid (non-stackable) waste...”.

Table 2.3 point 1 – CIWM is not sure what is meant by “...secure container (including lagoons).”, does this mean lagoons need to be secured in a container?

Table 2.3 point 2 – CIWM suggests adding “Liquid (non-stackable) waste shall...”.

Paragraph 2.3.2 – this is in italics and no other paragraphs are. Sub-paragraphs i and ii are not in the same format as all others which are a), b). CIWM suggests there needs to be a semi-colon at the end of the first point and full stop at the end of the second point.

Paragraph 3.2.2 – a) and b) sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.3.2 – sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.4.2 – sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.4.2, sub-paragraph a) – there is an “and” at the end of the sentence but this is not the same for all the other standard rules in this consultation round. CIWM suggests it is removed.

Paragraph 4.1.1 – sub paragraphs need to be formatted like those in 4.3.1.

There is nothing on Pests – such sections were in the standard rules consulted on under SR No 12. Pests are also a medium risk in the generic risk assessment.

Interpretation – agricultural land – there needs to be a full stop at the end of the sentence.

European Site – this has food production purposes within it, this section should be separated out by a carriage return at the end of “...will be considered as a European Site.”.

High readily available nitrogen wastes – there needs to be a full stop at the end of the sentence.

There is an extra line between secure storage and steeply sloping.

Waterlogged – there needs to be a full stop at the end of the sentence.

Generic Risk Assessment SR2010 No 4 v4 – CIWM suggests there does not need to be a full stop at the end of the text in Location (green heading box).

GRA SR 2010 No 4 v4 – Parameter 1 and 2 – there needs to be consistent use of full stops – check other GRAs. [CIWM made comment under SR No 9 on some GRAs].

GRA SR 2010 No 4 v4 – consistent use of full stops in the boxes. CIWM suggests they are either in or out.

GRA SR 2010 No 4 v4 – source – “Emissions, litter and mud on local roads” – there is no mention of litter in the following boxes. CIWM likes the GRA phrase used in GRA SR 2015 No 39 for this source. There is the use of COGAP in the Risk Management box and CIWM suggests this is added to the Abbreviations list.

GRA SR 2010 No 4 v4 – Justification for magnitude – source – “All on-site hazards:...” use the text at the end ...” for landspreading operations” in the Justification for magnitude box below for the “Arson and/or vandalism...” source.

GRA SR 2010 No 4 v4 – the “All on-site hazards...” scores very low in the residual risk but the “Arson and/or vandalism...” which as the same Judgement scores only low.

GRA SR 2010 No 4 v4 – “Accidental fire...” source. The Judgement for this is lower than the one above “Arson and/or vandalism...” but the residual risk is only

low. Why is this not very low or the Consequence increased to medium? Risk management - CIWM suggests putting the text in full and removing the comments on access to waste – instead of using “As above”.

GRA SR 2010 No 4 v4 – All surface waters. Acute effect talks about “Direct run-off from site...” and includes “No point source emissions...” in Justification for magnitude. Chronic effect talks about direct and indirect run-off but only has “There is a medium magnitude risk” for the Justification for magnitude, where the Acute has medium magnitude risk also so CIWM does not feel the Justification for magnitude in the Chronic effect is appropriate and does not really help. CIWM supports the format of GRA SR 2015 No 39 and suggests this is looked at in this context.

GRA SR 2010 No 4 v4 – Abstraction and Groundwater receptor. The Justification for magnitude says “No emissions are permitted...” should be point source emissions?

GRA SR 2010 No 4 v4 – Groundwater. The Risk management box has information that is also contained in the standard rule, but it also has “Additional risk assessment required if in an (should be a) groundwater source protection zone 2...” which is not in the standard rule. CIWM suggests that it might be useful to add this to the standard rule.

GRA SR 2010 No 4 v4 – Local human population Justification for magnitude has “Unlikely to occur”. CIWM suggests “Low probability of occurrence”.

GRA SR 2010 No 4 v4 – Soils. The Risk management box again has wording which it suggests is in the standard rule (CIWM assumes the use of SR means this is in the standard rule) but it is not. First and last sentence are not evident in the standard rule. There is text in relation to the waste producer information – second sentence.

CIWM is not sure what the information on the bottom of page 4 or that on page 5 is really about.

CIWM suggests checking that all the text boxes under Risk management have SR - where it is appropriate. CIWM also suggests using SR 2015 No 39 GRA as a basis for making the GRA useful in its wording used and remove all “As above” references.

## **SR 2010 No 5**

SR 2010 No 5 v3 - the introduction still has the watercourse information, which has now been moved in to the main standard rule, see Standard Rules No 12 consultation.

Paragraph 1.2.1 – the sub-paragraph text needs to be indented, see paragraph 1.1.1 above.

Table 2.1 – there needs to be consistency on use of full stops. There is one on R13 but not R10.

Table 2.1 – in the generic risk assessment there is the use of liquid (non-stackable) – CIWM suggests that one particular phrase is used for both and prefers the one used in Parameter 4 of GRA 2010 No 4 v4.

Paragraph 2.1.2, sub-paragraph b) – “shall be notified.” needs to be moved back to the rest of the line.

Paragraph 2.1.7 – instead of a semi-colon at the end of sub-paragraph b) there should be a full stop.

Paragraph 2.1.8 – there is no full stop at the end of the sentence.

Table 2.2 – CIWM assumes this needs to be labelled Table 2.2A as in SR 2010 No 4 v4 and what is labelled 2.3 Waste types should be Table 2.2B as in SR 2010 No 4 v4.

Table 2.2 – 100105 and 100107 – Flue should be lower case f.

Table 2.3 point 1 – CIWM suggests adding “All liquid (non-stackable) waste...”.

Table 2.3 point 1 – CIWM is not sure what is meant by “...secure container (including lagoons).”, does this mean lagoons need to be secured in a container?

Table 2.3 point 2 – CIWM suggests adding “Liquid (non-stackable) waste shall...”.

Paragraph 2.3.2 – this is in italics and no other paragraphs are. Sub-paragraphs i and ii are not in the same format as all others which are a), b). CIWM suggests there needs to be a semi-colon at the end of the first point and full stop at the end of the second point.

Paragraph 3.2.2 – a) and b) sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.3.2 – this needs to be the same as 3.3.2 in SR 2010 No 4 v4.

Paragraph 3.3.2 – sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.4.2 – sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 4.1.1 – sub paragraphs need to be formatted like those in 4.3.1.

Dangerous substances – there needs to be a full stop at the end of the sentence.

Emissions to land – there needs to be a full stop at the end of the sentence.

Groundwater Safeguard Zone – “has the meaning” – does not need to be in italics. There needs to be a full stop at the end of the sentence.

Groundwater Source Protection Zone – there needs to be a full stop at the end of the sentence.

High readily available nitrogen wastes – there needs to be a full stop at the end of the sentence.

SSSI - there is an extra pair of " at the start of SSSI. This interpretation is not in SR 2010 No 4 v4.

Stackable – this interpretation is not in SR 2010 No 4 v4.

Steeply sloping – there needs to be a full stop at the end of the sentence.

Topsoil – there needs to be a full stop at the end of the sentence.

Waste stream – size of the font for the word waste in "waste stream".

Footnote – BS 8601:2013 Specification for subsoil and requirements for use – why is this in twice when it is the same reference. Why not use No 1 for both and have one footnote.

Generic Risk Assessment SR2010 No 5 v3 – CIWM suggests there does not need to be a full stop at the end of the text in Location (green heading box).

GRA SR 2010 No 5 v3 – Parameter 1 and 2 – there needs to be consistent use of full stops – check other GRAs. [CIWM made comment under SR No 9 on some GRAs].

GRA SR 2010 No 5 v3 – consistent use of full stops in the boxes. CIWM suggests they are either in or out.

GRA SR 2010 No 5 v3 – source – "Emissions, litter and mud on local roads" – there is no mention of litter in the following boxes. CIWM likes the GRA phrase used in GRA SR 2015 No 39 for this source. There is the use of COGAP in the Risk Management box and CIWM suggests this is added to the Abbreviations list.

GRA SR 2010 No 5 v3 – source – "Flooding of site" – residual risk is very low. In SR 2010 No 4 v4 GRA it is low.

GRA SR 2010 No 5 v3 – "All on site hazards:..." – residual risk is low, this is very low in SR 2010 No 4 v4 GRA.

GRA SR 2010 No 5 v3 – "Arson and/or vandalism..." – Justification for magnitude needs to have "for landspreading operations" added as in the box above for "All so-site hazards:...".

GRA SR 2010 No 5 v3 – "Accidental fire..." - Risk management. CIWM suggests putting the text in full and removing the comments on access to waste – instead of using "As above".

GRA SR 2010 No 5 v3 – All surface waters. Acute effect talks about “Direct run-off from site...” and includes “No point source emissions...” in Justification for magnitude. Chronic effect talks about direct and indirect run-off but only has “There is a medium magnitude risk” for the Justification for magnitude, where the Acute has medium magnitude risk also so CIWM does not feel the Justification for magnitude in the Chronic effect is appropriate and does not really help. CIWM supports the format of GRA SR 2015 No 39 and suggests this is looked at in this context.

GRA SR 2010 No 5 v3 – page 4 “Abstraction ...” receptor. In the Risk management column CIWM suggests the addition of SR – at the start of the text as in previous boxes.

GRA SR 2010 No 5 v3 – Local human population Justification for magnitude has “Unlikely to occur”. CIWM suggests “Low probability of occurrence”. In the Risk management box CIWM suggests SR – at the start of the text.

GRA SR 2010 No 5 v3 – Soils. The Risk management box again has wording which it suggests is in the standard rule (CIWM assumes the use of SR means this is in the standard rule) but it is not. First and last sentence are not evident in the standard rule. There is text in relation to the waste producer information – second sentence.

CIWM is not sure what the information on the bottom of pages 5 or that on page 6 is really about.

CIWM suggests checking that all the text boxes under Risk management have SR - where it is appropriate. CIWM also suggests using SR 2015 No 39 GRA as a basis for making the GRA useful in its wording used and remove all “As above” references.

## **SR 2010 No 6**

SR 2010 No 6 - the introduction still has the watercourse information, which has now been moved in to the main standard rule, see Standard Rules No 12 consultation.

Paragraph 1.2.1 – the sub-paragraph text needs to be indented, see paragraph 1.1.1 above.

Table 2.1 – this table has full stops on both columns, there needs to be consistency on use of full stops between all the standard rules.

Paragraph 2.1.2 – CIWM suggests this is the same format as SR 2010 No 4 v4.

Paragraph 2.1.7 – there needs to be a full stop at the end of the sentence.

Paragraph 2.1.8 - there needs to be a full stop at the end of the sentence.

Paragraph 2.2.1 – this should be indented as 1.1.1.

Table 2.3 – this needs a heading, see SR 2010 No 5 v3.

Table 2.3 point 1 – CIWM suggests adding “All liquid (non-stackable) waste...”. There needs to be a full stop at the end of the sentence.

Table 2.3 point 1 – CIWM is not sure what is meant by “...secure container (including lagoons).”, does this mean lagoons need to be secured in a container?

Table 2.3 point 2 – CIWM suggests adding “Liquid (non-stackable) waste shall...”.

Table 2.3 point 3 – there needs to be a full stop at the end of the sentence.

Paragraph 2.3.2 – Sub-paragraphs i and ii are not in the same format as all others which are a), b). CIWM suggests there needs to be a semi-colon at the end of the first point and full stop at the end of the second point.

Paragraph 3.2.1 – there needs to be a full stop at the end of the sentence.

Paragraph 3.2.2 – a) and b) sub paragraphs need to be formatted like those in 1.1.1.

Paragraph 3.3.2 – a) and b) sub paragraphs need to be formatted like those in 1.1.1. At the end of b) there needs to be a semi-colon and not a full stop.

Paragraph 3.4.2 – a) and b) sub paragraphs need to be formatted like those in 1.1.1.

Interpretation – groundwater Safeguard Zone – there needs to be a full stop at the end of the sentence.

Groundwater Source Protection Zone – “...has the meaning given in the document titled “Groundwater Protection: Principles and practice” (GP3) published by the Environment Agency in 2013” does not need to be in italics. There should also be a full stop at the end of the sentence.

High readily available nitrogen wastes – there needs to be a full stop at the end of the sentence.

## **SR 2010 No 17**

SR 2010 No 17 v2 – Title and sub title – CIWM asks if it might be worth adding ‘liquid’ to the wastes as the generic risk assessment talks about liquid waste.

Introduction - still has the watercourse information, which has now been moved in to the main standard rule, see Standard Rules No 12 consultation.

Paragraph 1.1.1 - the sub-paragraph text needs to be indented, see paragraph 2.2.2.

Paragraph 1.2.1 – the sub-paragraph text needs to be indented, see paragraph 2.2.2.

Table 2.1 – first sentence under Limits of activities needs a space between secure and storage. There is also an extra space before the full stop at the end.

Table 2.1 – there needs to be consistency on use of commas for tonnage, this SR as commas, SR 2010 No 6 does not. SR 2015 No 39 has commas – CIWM is not sure what the default is but all Standard Rules should be the same.

Paragraph 2.2.2 – CIWM suggests this is updated as in SR 2015 No 39 paragraph 2.4.2.

Table 2.3 – heading Waste Types – the T of types should be lower case.

Table 2.3 020101 – Soils should be a lower case s.

Table 2.3 020305 – Effluent should be a lower case e.

Table 2.3 190118 – both entries do not need to have a full stop at the end of the entry.

Table 2.4 – Point 1 – this mentions the requirements for stackable wastes but this requirement is not in any of the other SRs within this consultation. As the GRA indicates this is looking at liquid waste CIWM suggests the GRA needs to reflect what is in the SR – assuming the storage is not just for liquid (non-stackable) wastes.

Table 2.4 – Point 2 – this extra text in relation to CIRIA Report needs to go in the other SRs as well.

Paragraph 3.2.2 – the sub headings text needs to be indented, see paragraph 2.2.2.

Paragraph 3.3.2 – the sub headings text needs to be indented, see paragraph 2.2.2.

Paragraph 4.1.1 – the sub headings text needs to be indented, see paragraph 2.2.2.

Paragraph 4.1.1 d) ii) - needs a full stop at the end of the sentence.

Paragraph 4.3.1 b) – the extra space needs to be taken out before the semi-colon.

Interpretation – emissions of substances non controlled by emission limits – there are two full stops at the end of the sentence.

Interpretation – there is no groundwater Safeguard Zone included here, it is in SR 2010 No 5.

Interpretation – groundwater Source Protection Zone – there needs to be a full stop at the end of the sentence.

Interpretation – there is no entry for waste code as for SR 2010 No 5.

GRA SR 2010 No 17 v2 Activity type – this just mentions digestate and lagooning but in the SR there is mention of stackable wastes.

GRA SR 2010 No 17 v2 – Permit holder and Location – there is a full stop at the end of each of these but not the other headings. CIWM suggests the full stops are removed, unless all SRs have full stops here.

GRA SR 2010 No 17 v2 – Parameter 4 and 5 – there are full stops at the end of these parameters and not at the end of the others.

GRA SR 2010 No 17 v2 – there needs to be a consistent use of full stops in the text boxes. This has been noticeable throughout all the SRs.

GRA SR 2010 No 17 v2 - page 2 – this does not have the table headings following over the pages.

GRA SR 2010 No 17 v2 – Local human population and environment receptor – Justification of magnitude column needs a capital M on methane.

GRA SR 2010 No 17 v2 – Local human population, livestock and wildlife receptor – Residual risk column – this is classed as very low here but only low in SR 2010 No 4 and No 5.

GRA SR 2010 No 17 v2 – Pests source and Risk management column – using “As above.” when this text refers to scavenging birds or animals. CIWM suggests checking GRA SR 2010 No 5 v2 wording.

CIWM is not sure what the information on the page 4 is really about.

### **SR 2008 No 27**

SR 2008 No 27 – Introduction – there needs to be a full stop at the end of the first sentence. There is an extra carriage return before the bullet points which CIWM suggests needs to be removed. The last sentence of the final paragraph at the bottom of the Introduction does not make sense if read with the sub-headings. CIWM suggests “This permit allows...Directive 2008/98/EC. You can demonstrate that you have met the end of waste tests by either: a) meeting all the criteria...”.

Paragraph 1.2.1 – the sub-paragraph text needs to be indented, see paragraph 1.1.1.

Table 2.1 – the title needs to be “Activities”.

Table 2.1 – last two bullet points under Limits of activities do not need full stops, to be consistent with the other bullet points. The “and” needs to be removed from the penultimate bullet point.

Paragraph 2.5.1 – the font size of this paragraph needs to be checked.

Paragraph 3.2.2 – the sub-paragraph text needs to be indented, see paragraph 1.1.1.

Paragraph 3.3.2 - the sub-paragraph text needs to be indented, see paragraph 1.1.1.

Paragraph 3.4.2 - the sub-paragraph text needs to be indented, see paragraph 1.1.1.

Paragraph 4.1.1 - the sub-paragraph text needs to be indented, see paragraph 1.1.1.

Paragraph 4.3.4 - the sub-paragraph text needs to be indented, see paragraph 4.3.1.

### **Deposit of waste for recovery activities**

**Question one:** *Do you agree with our approach to use standard rules for deposit of waste for recovery activities?*

CIWM supports this approach.

**Question two:** *What are your views on the proposed changes and why?*

CIWM was involved in the stakeholder meetings held prior to drafting this standard rule and support the move to change this standard rule to make it workable for recovery of waste.

**Question three:** *Do you understand the requirements of the proposed new standard rules?*

The requirements are easy to follow and understand.

**Question four:** *Will the proposed standard rules provide a useful mechanism to allow the beneficial use of waste?*

CIWM believes this standard rule does provide a useful mechanism for the beneficial use of waste for construction, reclamation, restoration or improvement of land.

**Question five:** *Have we correctly identified all the risks for the activity, as described in the generic risk assessment associated with the consultation?*

CIWM is not aware of anything particular that is not already included.

**Question six:** *We have estimated the net benefit of the proposed change to be -£0.67 million\*. This is set out in the draft Business Engagement Assessment that forms part of this consultation. Do you agree? If you disagree, please explain why, and provide evidence to support your assessment of the impacts.*  
*\*Equivalent Annual Net Cost to Business (EANCB)*

CIWM has no comment to make on this.

**Question seven:** *Will the proposals have any other impacts that we have not identified. These could be financial impacts or costs and benefits that are not readily quantifiable.*

CIWM is not aware of any at this time.

**Question eight:** *Please tell us if you have any other views or comments on these proposed revisions that have not been covered by previous questions.*

#### Typographical errors

#### **SR 2015 No 39**

CIWM likes the front page layout of SR 2015 No 39, although this is totally different to the layout of all previous SRs. The reference to the Standard Rules legislation does not include reference to chapter 4 as in all the other SRs.

Paragraph "These standard rules do not allow any tipping..." – the "tipping" before "sub-water" does not need to be there.

CIWM suggests there needs to be a foot note as in all the other SRs.

Paragraph 1.1.1 – sub-headings are not indent as for other SRs, those within this consultation are indented to align the a) with the start of the text, not the paragraph number (as in this SR).

Table 2.1 - table heading "activities" needs to be a capital A. There is also no colour on the heading banner which there has been all other SRs.

Paragraph 2.2.2 – there is a spelling mistake or ordinance. The semi-colon at the end of 2.2.2 b) should be a full stop.

Table 2.3 – there is no colour on the heading banner of the table, as in all other SRs.

Table 2.3 point 1 a) – "Are..." should be a lower case a.

Paragraph 2.4.2 – CIWM believes this should be included in the all the other SRs as it includes all the up-to-date requirements.

Paragraph 2.5.1 – at the end of each sub-heading (except (f)) there should be semi-colons and not commas.

Table 2.5 - Exclusions sub-heading – the two sentences under “Wastes having any of the following...” need to be indented as bullets.

Table 2.5 – Sub-source 01 04 – “Wastes...” should be a lower case w.

Table 2.5 – Sub-source 17 01 – “Concrete...” should be a lower case c.

Table 2.5 – Sub-source 17 05 – “Soil...” should be a lower case s.

Table 2.5 – Sub-source 19 12 – “Wastes...” should be a lower case w.

Table 2.5 – Additional restrictions heading – All the text here except “Road planings only” has a full stop – there needs to be consistency. The text in the Description heading does not have any full stops.

Paragraph 2.6.1 – at the end of each sub-heading (except (h)) there should be semi-colons and not commas.

Paragraph 2.6.3 – at the end of each sub-heading (except (c)) there should be semi-colons and not commas.

Paragraph 2.6.4 – the comma at the end of this sentence should be a colon.

Paragraph 4.3.1 – Notifications – there appears to be a full stop at the start of this sentence.

Paragraph 4.3.1 – at the end of each sub-heading (except (b)) there should be a semi-colon and not a comma.

Paragraph 4.3.5 – there is a colon at the end of this sentence and it should be a full stop. CIWM suggests checking the format of this paragraph with that in SR 2010 No 17.

Paragraph 4.4.1 – Interpretation – this text needs to be updated as for SR 2008 No 27 and those in SR consultation No 12.

Paragraph “accident” to “emissions of substances...” “good habitat” to “watercourse” – these sub-headings should be in italics as for all other SRs.

Paragraph “good habitat” needs a full stop at the end.

There is no paragraph for “groundwater Safeguard Zone” as in SR 2010 No 6, CIWM asks if there should be.

Paragraph “groundwater Source Protection Zone” – the font size needs checking throughout this sentence.

Paragraph “historical landfill” – “Means...” this should have a lower case m.

Paragraph “pollution” – the sub-headings need to be indented and (a) to (c) need to have semi-colons and not commas at the end.

Paragraph “restoration, reclamation and ...” there is no “ ” at the end of the definition but there is ‘ ’ at the start of means.

Paragraph “water body” and “watercourse” are after “year” which is not then alphabetical.

CIWM is aware that “water body” and “watercourse” are not in the other SRs that, should they be?

GRA SR 2015 No 39 – there is no header at the top of the page that indicates which SR this is, unlike all other SRs.

GRA SR 2015 No 39 – Location heading – there does not need to be a full stop at the end of the text.

GRA SR 2015 No 39 – Parameter 4 – this is difficult to determine where 4 and the following Parameters end, CIWM suggests spacing the Parameters out as in the other SRs.

GRA SR 2015 No 39 – Parameters 4, 5 and 9 have full stops at the end, the others do not, CIWM suggests removing these.

GRA SR 2015 No 39 – consistent use of full stops in the boxes. CIWM suggests they are either in or out.

GRA SR 2015 No 39 – CIWM likes the Justification for magnitude as they are specific to the SR as the risk assessment should be. There is no use of “As above” in any of the boxes within this risk assessment, which CIWM fully supports.

GRA SR 2015 No 39 – Risk management columns do not have SR – before the text, this is in most if not all of the other SRs. CIWM assumes the SR relates to text that is in the SR and ties this to the risk assessment. CIWM fully supports this.

GRA SR 2015 No 39 – Mud and waste on road – Justification for magnitude has relevant text and CIWM suggests this type of text is incorporated into all other SRs. All the other SRs have litter as part of this Source but CIWM suggests this is a better Justification.

GRA SR 2015 No 39 – some of the Judgement scores are different to those in the other SRs, CIWM suggests the scores (very low, low, medium and high) are assessed for all the SRs in this consultation.

GRA SR 2015 No 39 – “Pests...” source – this still talks about attracting animals and birds which is covered in the “Scavenging animals and ...” source. CIWM suggests this has appropriate text, as noted for all the other SRs.

GRA SR 2015 No 39 – “Flooding of site” source – Justification of magnitude text is good and CIWM suggests this is incorporated into SR 2010 No 4, No 5 and No 17.

GRA SR 2015 No 39 – “All on site hazards...” – Justification of magnitude text is good and CIWM suggests this is incorporated into the other SRs as necessary.

CIWM is not sure what the information on the pages 6 and 7 is really about.