Briefing for the Public Petitions Committee

**Petition Number:** PE1553  
**Main Petitioner:** Councillor Andrew S Wood  
**Subject:** Rendering Industry Regulations

Calls on the Parliament to urge the Scottish Government to review the regulations that meat rendering plants must comply with to operate in Scotland.

**Background**

The petition raises the following concern:

‘Animal rendering in the UK operates in a highly competitive market but seemingly subtle differences in environmental regulation between England and Scotland puts Scottish renderers at a competitive disadvantage.’

**What is animal rendering?**

As set out by the [UK Renderers Association](https://www.ukrenderersassociation.org.uk), rendering involves the processing of those parts of meat animals that are not used for human consumption. Those parts include the head, feet, bones, intestines, blood and various other tissues, which we cannot or choose not to eat. Processing involves the crushing or grinding of the raw material, followed by heat treatment to reduce the moisture content and kill micro-organisms. The resulting material is used for products such as fuel, soap and glue.

**European Regulations for animal rendering plants**

The Industrial Emissions Directive (IED) aims to minimise pollution from various industrial activities throughout the European Union. Operators of certain industrial installations that are covered by the directive are required to obtain an environmental permit from the authorities in EU countries. These permits provide operational measures to control emissions to the environment.

Regulation 22 of the Directive sets out a requirement that a condition of a permit is that an operator use the best available techniques (BAT) for ‘preventing, or where that is not practicable, reducing emissions from an installation or mobile plant.’
Regulations for animal rendering plants in Scotland

In Scotland the IED has been brought into effect by the Pollution Prevention and Control (Scotland) Regulations 2012, which are otherwise known as ‘PPC’. The Scottish Environment Protection Agency (SEPA) is the designated regulator responsible for enforcing the regime within Scotland. Operators are required to demonstrate to SEPA that they will adhere to the general principles of PPC which include:

- Using "Best Available Techniques", which balance the benefits to the environment against the costs to the operator, to prevent or minimise pollution
- Minimising waste produced by the process, and recycling waste where possible
- Reducing the amount of energy used
- Using less hazardous substances, and taking account of the nature, effects and volume of emissions from the facility
- Preventing accidents
- Restoring the site once operations cease
- Minimising heat and noise emissions.

There are currently two animal rendering plants operating in Scotland.

Regulations for animal rendering plants in England and Wales

In England and Wales the IED is implemented by Environmental Permitting (England and Wales) Regulations 2010. These regulations refer to two types of installations.

- A1 installations which tend to be larger and are regulated by the Environment Agency, and
- A2 installations which tend to be smaller and are regulated by Local Authorities.

Guidance for regulating animal rendering activity


The guidance sets out the Best Available Techniques (BAT) for the processing of animal remains and by-products. It allows for local considerations to be taken into consideration. It states that (p 1) –

“… for each processing of animal remains and by-products installation, local authorities (subject to appeal to the Secretary of State / WAG)
should regard this guidance note as a baseline, but ensure they take into account any relevant case-specific factors such as the individual process configuration and other characteristics, its size, location and any other relevant features of the particular installation.”

Permits in England and Wales are subject to appeal to the Secretary of State or the Welsh Assembly Government. Permits in Scotland are subject to appeal to Scottish Ministers.

To support the implementation of the BAT approach information referred to as ‘BAT reference documents’ (BREFs) are drawn up at an EU level for particular sectors based on an exchange of information between member states and industries. The BREFs describe applied techniques, emissions, BAT conclusions and emerging technologies and are designed to provide information for regulators to consider when determining permit conditions.

The process of writing a BREF for the Animal Rendering Industry will begin later this year, led by the European IPPC Bureau. A member of SEPA staff will be the UK lead to this process. It will take a number of years to complete. Once complete this will be used as guidance in both England and Wales, and Scotland. In the meantime Note IPPC SG 8 remains the guidance followed.

Scottish Government Action

The Scottish Government consulted in late 2012 on a new set of Regulations to implement the Industrial Emissions Directive. A partial Business & Regulatory Impact Assessment was produced. Revised draft Regulations were approved by the Scottish Parliament and came into force from 7 January 2013 as the Pollution Prevention and Control (Scotland) Regulations 2012.

Scottish Parliament Action

None

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