Dear Rob

On the 9 December the RACCE Committee considered the negative SSI, the Animal By-Products (Miscellaneous Amendments) (Scotland) Regulations 2015. However, the Committee was not able to conclude its consideration of this instrument and requested further information from the Scottish Government. You requested further information on the evidence that companies will be able to secure lower cost contracts with more sustainable processes once the landfill prohibition is in place.

This information comes from a Zero Waste Scotland report, “Finfish Mortalities in Scotland”, funded by the Scottish Government to look at Scottish fish farm waste and identify current waste disposal routes, suitable alternative animal by-product compliant disposal routes and the existing waste capacity in Scotland. Using the data gathered from engagement across the haulage and waste treatment industries the project identified that where companies are landfilling fish farm waste, they are able to secure animal by-product compliant and sustainable disposal routes at lower a cost than they currently pay for landfilling their waste.

The Finfish Mortalities in Scotland project report is in its final stage of publication and we anticipate it being published by the end of 2015. The project findings were shared with the Fish Waste Working Group on 26 November and feedback on the detailed analysis that has been carried out was positive.

The Committee also asked why low cost alternatives are not being used by companies who send their fish waste to licensed landfill sites. The simple answer is that as yet there is a lack of knowledge of alternative disposal routes for fish waste and landfilling is the default disposal option. In recent years, there have been a number of significant developments in infrastructure in Scotland for the processing of animal by-products.
The Scottish Government has been promoting these alternative disposal options through the Fish Waste Working Group, contacting companies directly, working with industry to produce guidance documents and updating our website. We anticipate that the Finfish Mortalities in Scotland report will be used to highlight best practices within the aquaculture sector in Scotland.

Yours sincerely,

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RICHARD LOCHHEAD

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