



8<sup>th</sup> May 2018

Scottish Environment Protection Agency  
Strathallan House  
The Castle Business Park  
Stirling  
FK9 4TZ

Dear Sir / Madam,

### **CONSULTATION ON SCOTCH WHISKY SECTOR PLAN**

The Scotch Whisky Association (SWA) is the industry's representative organisation and aims to protect and promote Scotch Whisky worldwide. Our 70 member companies include distillers, blenders, bottlers and brokers of Scotch Whisky and represent around 90% of the industry. We welcome the opportunity to respond to this consultation.

Scotch Whisky makes a vital contribution to the Scottish economy - adding around £5 billion each year to the UK economy and supporting 40,000 jobs in Scotland.

The vast majority of our Members have some type of SEPA interaction and are permitted for licensed activities ranging from simple registrations through to IPPC permits.

The Scotch Whisky industry is committed to continuing the sustainable production of our products. Scotch Whisky is a natural product closely tied to its environment and rural communities across Scotland. Environmental sustainability is therefore one of the industry's and Association's top priorities. Building on our original 2009 sector environmental strategy, the industry refreshed its ambitious and wide-reaching Environmental Strategy in September 2016. The strategy displays a real commitment from our members to lessening the environmental footprint of the sector and confirms our industry aims to move beyond compliance to deliver sustainability.

SWA has a number of general comments set out below as well as providing answers to the specific questions.

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## GENERAL COMMENTS

Firstly SWA is supportive of SEPA's One Planet Prosperity and we are keen to play our part in supporting the delivery of this ambition. We also agree SEPA must make transformational changes in how businesses are regulated to successfully tackle today's environmental problems.

The Scotch Whisky Association's Environmental Strategy is already moving the majority of our members in a beyond compliance direction. We are pleased that the sector plan confirms SEPA support for our strategy targets. Furthermore that they are committed to building on this momentum to help facilitate their achievement and encourage us to go further in our ambitions. In turn, our sector environmental strategy strongly compliments the key themes of SEPA plan which are water, energy and materials.

The Association supports the proposal for SEPA to use traditional regulatory tools in clearer and more powerful ways, as well as exploring completely new ways of enforcement to enable and support innovation in our sector.

We agree the sector plan should provide a more systematic approach to identifying issues to be solved by the sector. As well as facilitating the identification of the biggest opportunities for the sector to go beyond compliance.

We strongly agree with SEPA's commitment to work closely with those that demonstrate a commitment to good environmental performance and to deliver solid outcomes, by providing powerful support through guidance, advice and through other Better Regulation tools.

Turning to the detail of the sector plan, we have provided answers to the specific questions posed in the consultation below;

## SPECIFIC COMMENTS

**Question 1. We want to be a world class regulator, adopting innovative and novel approaches that help as many operators as possible to move beyond minimum legal standards and create economic and social success for Scotland from environmental excellence. Do you think these first three sector plans set the right level of ambition to achieve this goal?**

We are proud to be in the 1<sup>st</sup> tranche of sector plans and we look forward to working collaboratively with SEPA to deliver the 2018/19 priority actions.

The delivery of our successes as well as the identification of new challenges will be constantly shifting; therefore the sector plan should be seen as a live document to allow flexibility on what actions should be prioritised and where resources should be focused.

**Question 2. Do you think that the plans set the right level of ambition for the sector?**

The Association supports and agrees with the vision for our sector set out in the plan.

**Question 3. Do the plans contain the right actions to: (a) tackle non-compliance and (b) to help businesses go beyond compliance?**

Broadly yes for both non-compliance as well as beyond compliance. The sector plan builds upon the existing good work and current joint initiatives which will support the delivery of the priority actions. An example of an existing initiative is the Scotch Whisky Industry Training for SEPA staff.

**Question 4. Are there other opportunities that SEPA should be taking, or partners that we should be working with, that have not been referenced?**

For SEPA to succeed in delivering their One Planet Prosperity ambition we believe SEPA will also have to be innovative in the way they regulate, whilst ensuring the delivery of the same environmental outcomes. This can only be achieved through new and innovative regulation and enforcement tools.

SWA already shares best practice across the Scotch Whisky sector and we hope the sector plan will facilitate the widening out of these types of discussions to across all business sectors.

**Question 5. Do you agree with the targets and priority actions for 2018-2019?**

Broadly yes. The delivery of the priority actions will be a culmination of a range of partnerships from SEPA working with individual sites, through to working with the sector as a group; the Trade Association as well as the wider supply chain and other interested parties.

**Question 6. Do you have any other comments?**

No

**Question 7. If you have any additional questions regarding our consultations or would like someone to get back in touch, please provide your details.**

N/A

The Scotch Whisky Association looks forward to supporting SEPA during the launch the final Scotch Whisky plan in July. As well as working with SEPA and our members in the delivery of the 2018/19 priority actions.

Yours faithfully

Morag Garden  
Head of Sustainability and Innovation