

15<sup>th</sup> October 2007

**EAUC Response to the Consultation on Revision of the Hazardous Waste Technical Guidance (WM2)**

Please find below a response to the above consultation. This response has been led and prepared by the Scottish Branch of EAUC (EAUC-S). EAUC-S considers it relevant to make a response to this consultation as WM2 is widely used in Scotland and its use is supported by SEPA.

The profile of waste generated in the higher and further education sector, and in particular in some universities, is somewhat unusual when compared to organisations of a similar scale. This results from the wide range of activities that can be undertaken by each institution. Of particular relevance to this consultation is the use of a wide range of chemical materials in teaching and research activities. Whilst many institutions utilise a wide range of chemicals, it is generally the case that the quantity of any specific chemical used is extremely small when compared to commercial or industrial users of the same chemical, and it is against this background that the proposed changes have been viewed.

EAUC has no comments on specific parts of the document. However, a response to the general questions posed in the introductory documentation is below.

I hope that this response gives a clear picture of the view of the further and higher education sector in Scotland and the rest of the UK on the proposed changes to WM2.

Should you require any expansion of the views expressed or any further input on this or aspects of regulation relating to our sector please do not hesitate to contact me.

Yours truly,



Iain Patton, Executive Director

***Response to Consultation Questions***

**Q1. Do you agree that the criteria for Ecotoxicity from CHIP should be adapted and applied to hazardous waste?**

Yes. However it is important that a full explanation of this is inserted in WM2 to avoid the need to cross reference to CHIP.

**Q2. Do you agree with the use of substance specific thresholds for very Ecotoxic substances.**

Yes

**Q3. Do you believe that the use of trace impurity thresholds should be applied to the assessment of hazardous waste for Ecotoxicity?**

Yes

**Q4. Do you agree that animal testing should not normally be used for the assessment of hazardous waste?**

Yes

**Q5. Do you agree with the removal of the 50ppm threshold for PCBs?**

We have some concerns regarding the removal of this threshold. Whilst agreeing that for many substances (for practical, common sense, and business reasons) there should be threshold values, and that these individual substances need not be considered when at very low concentrations (below the threshold value), it is also necessary to consider the persistent nature of some substances, such as PCBs. For these substances an individual disposal of low level concentration may be relatively insignificant. However, when taken together with other similar disposals, and in light of the persistent nature of the compound, we believe that it is inappropriate to remove the 50ppm threshold. By doing so it would effectively risk exposing the environment to a 50 times increase in PCBs (the old threshold was 50ppm – 0.005%, the new threshold would be 0.25%)

**Q6. Are there any other Ecotoxicity issues you believe this revision should cover?**

No

*In partnership with*