

# **Response to the Scottish Landfill Tax Consultation on Draft Subordinate Legislation by the Scottish Environment LINK Scottish Environmental Fundraising Forum (SEFF) Taskforce**

**Date: 1<sup>st</sup> August 2014**



The Scottish Environmental Fundraising Forum (SEFF) is the taskforce within Scottish Environment LINK that has a specific interest in funding for the environment. This taskforce was deemed appropriate to represent Scottish Environment LINK on the matter of the proposed Scottish Landfill Tax given the proposal for a Scottish Landfill Communities Fund (LCF) within this devolved tax. All member organisations within SEFF were consulted with regard to a response, but not all members responded. It should be made clear therefore that this consultation response constitutes the views of the six organisations within SEFF listed at the end of this document.

The respondents were all in agreement with and supportive of RSPB Scotland's response to the same consultation (submitted 24<sup>th</sup> July 2014). There were no objections to the views of RSPB Scotland's response being representative of SEFF's views. SEFF's position therefore is to endorse the RSPB Scotland response.

The full responses to the consultation responses that were of concern to SEFF members are detailed in the aforementioned RSPB Scotland consultation, however to summarise:

- SEFF are pleased with that way that the proactive and comprehensive manner in which the Scottish Govt have approached the devolution of the landfill tax and in particular are endeavouring (by responding positively to issues raised by stakeholders) to replicate and improve the Landfill Communities Fund for the benefit of Scottish communities and the natural environment.
- SEFF are supportive of the suggested LCF distribution mechanism and welcome the reduction in administrative burden which will mean more money can go directly towards worthy projects.
- SEFF agree with the proposed objectives of the Scottish LCF which will provide a broad range of benefits to communities. With regard to Object B (Community Based Recycling and Reuse Projects) the fund should not fund projects that are the responsibility of local authorities or Zero Waste Scotland.
- SEFF welcomes the principle that the 10 mile proximity rule be extended to include transfer stations as disamenity is also associated with transfer stations through increased traffic, noise and disturbance. This will also increase the geographical area that the fund will cover, meaning more communities and nature will benefit. The change must however be reflected in the regulations.
- SEFF request that the 10 mile rule be treated as guidance and that flexibility provided to allow projects outwith the 10 mile radius in exceptional circumstances.
- SEFF do not agree that the water discount should be removed from a Scottish Landfill Tax as there are no plans to do so in England and this may lead to 'waste tourism' and result in a reduction of revenue going to the Scottish Government and ultimately to the LCF.

## LINK Consultation Response

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through Taskforces – groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK members welcome the opportunity to comment on this consultation.

**This response was compiled on behalf of LINK Scottish Environmental Fundraising Forum (SEFF) Taskforce and is supported by:**

Archaeology Scotland  
Froglife  
John Muir Trust  
RSPB Scotland  
Scottish Wildlife Trust  
Woodland Trust Scotland

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