

LEATHER SECTOR PLAN

For information on accessing this document in an alternative format or language please either contact SEPA by telephone on 03000 99 66 99 or by email to equalities@sepa.org.uk

If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language.

<http://contactscotland-bsl.org/>

www.sepa.org.uk

03000 99 66 99

The Castle Business Park, Strathallan House,
Stirling FK9 4TZ

Contents

Preface	5
1. Introduction	6
2. Our vision for the leather sector	9
3. Outcomes	11
4. The leather sector	13
5. Potential environmental impacts and how they are managed	19
6. Tackling non-compliance and taking opportunities to go beyond	25
7. Summary of actions and aspirations	33



Preface



SEPA has a strong track record of regulating to improve the Scottish environment. We are proud of what we have achieved since we were set up just over two decades ago in 1996. We know we need to do more over the next two decades to build on this success. Much more.

The mounting scientific evidence about climate change, plastics in our oceans, the pressure on our freshwater and more shows us that humanity must rise to tackle major environmental challenges. This scientific knowledge underpins SEPA's strategy for how we will regulate - One Planet Prosperity. If everyone in the world lived as we do in Scotland, we would need three planets. There is only one.

So, we will regulate to help Scotland prosper within the means of our one planet. Successful businesses in future will be those that use low amounts of water, materials and carbon-based energy and create little waste. Prosperous societies will be comprised of these businesses. This can be Scotland.

In every sector we regulate, this means we will have two simple aims. We will:

1. ensure that all business fully meet their environmental compliance obligations;
2. help as many businesses as possible move beyond their environmental compliance obligations.

This sector plan outlines how we will do this in regulating the leather sector.

Leather production has taken place in Scotland for many years. There are many improvements in the environmental performance of the sector that have been made and many more opportunities for further enhancements.

That's why this sector plan is so important. It spells out ideas for how SEPA can assist the sector to solve any compliance issues and to develop actions that take it beyond environmental compliance obligations.

Our plan is ambitious. It spells out how we will use traditional environmental protection agency (EPA) regulatory tools, such as permits and enforcement, in clearer and more powerful ways. It sets out some completely new ways, such as novel partnerships, that we will develop and use to support innovation in this sector.

Terry A'Hearn
SEPA Chief Executive Officer

1. Introduction

SEPA’s statutory purpose is to protect and improve the environment in ways that, as far as possible, create health and well-being benefits and sustainable economic growth. To help create a prosperous Scotland that lives within the means of our one planet, we need to radically change the way we work. In the past our approach to regulation has been grounded in different sets of rules to protect the environment. This has helped us to deliver, for example, improvements in water quality. However, it will not enable us to make the transformational changes needed to tackle today’s problems.

We are moving instead to ground our approach to regulation by working across whole sectors. In this way we can systematically identify the compliance issues that need to be tackled by the sector. However mere compliance and small scale incremental change will not be enough. We want to help businesses and sectors to implement successful innovation and support them in their ambitions to do more than they are required to by regulation. We call this moving beyond compliance, helping already high performing businesses to do more for the environment because it makes sense for them to grow in a sustainable manner.

Many businesses in this sector are already moving beyond compliance, for example, by implementing zero waste policies and reducing the carbon foot print of leather production by using direct means of resource recovery and renewable energy generation. The regulated sector is now setting standards within the global leather industry for low carbon sustainable manufacturing. We can also identify where the biggest opportunities are for us to help the sector to go beyond compliance. In both ways this will help businesses operate successfully within the means of one planet.

All businesses that we regulate in a sector use water, energy and raw materials to produce the products and services they sell. In doing so, they also create waste and emissions. We can think of these as environmental flows that need to be managed by the business (Figure 1).

We want to help as many businesses as possible to manage these flows effectively. Reducing their use of natural resources and reducing the creation of waste, will enable them to meet their legal obligations, drive further improvements and operate their business successfully. To facilitate this, we are preparing sector plans for every sector that we regulate.

Sector plans are at the heart of everything we do, shaping the interactions with every sector and the businesses in them. Through them, operators will get the relationship that their attitude and performance earns. Those that demonstrate a commitment to good environmental performance and to delivering solid outcomes will receive powerful support through guidance and advice. Those that demonstrate behaviour which leads to significant or chronic non-compliance can expect SEPA to use the most appropriate enforcement tools to bring them into compliance.

Sector plans are strategic documents, their aims and aspirations will evolve over time. Implementation of the plans will take account of opportunities, for example, to work across different sectors, improve communications and develop partnerships. SEPA will also consider the relative corporate priority of different work areas.

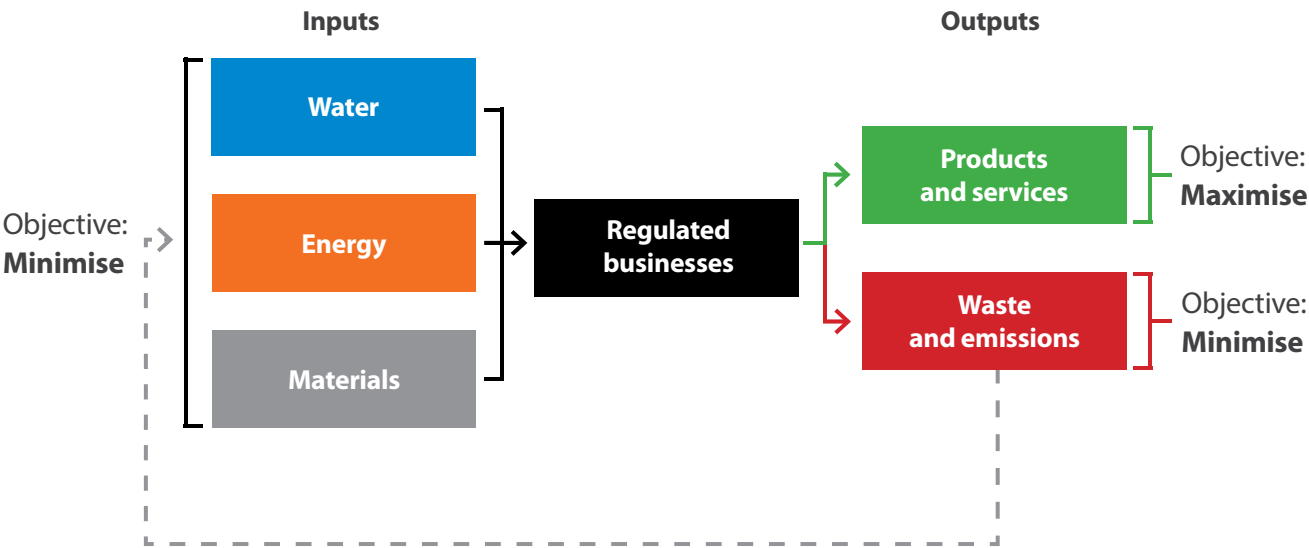
Scope of the Leather Sector Plan

This is our plan for the leather sector. It details how we are going to regulate the sector and work with it to protect and improve the environment. The plan focuses on organisations that manufacture leather from bovine hides. It explains how we will work directly with operators and sites and includes ways that we will use our shared influence to improve environmental performance throughout the industry supply chain.

We recognise that leather production can range from manufacturers considered micro-scale through to those exporting to a global market.

The Scottish leather sector is at the forefront of developing innovative processes. It pursues beyond compliance opportunities in water and waste reuse, and leads by example on producing leather with a low environmental impact for the high quality market. This plan will build on that and help drive the sector to pursue environmental excellence in the way it operates and develops.

Environmental flows (Figure 1)



2. Our vision for the leather sector

Our vision for the sector is that:

- Scotland is a global leader in the production of leather with a low environmental impact.
- Where energy and raw materials are selected, preference is given to those with the lowest environmental impact.
- The leather sector has a zero waste to landfill policy and ensures that all residues from the manufacturing process are in use for as long as possible and at as high a value as possible.
- The Scottish leather sector leads the way in the use of innovative methods associated with the production of leather with a low environmental impact.
- The leather sector is a leader in involving and engaging with its community of stakeholders.

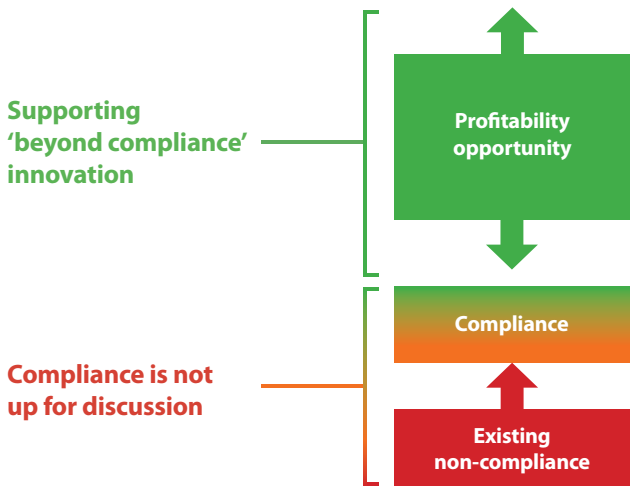
Our objectives

The objectives of the leather sector plan are to:

- ensure that all businesses fully meet their environmental compliance obligations;
- help as many businesses as possible move beyond their environmental compliance obligations.

This is illustrated by the sector roadmap (Figure 2):

Sector roadmap (Figure 2)



This sector plan sets out how we will work with the leather sector. For our vision and objectives to be achieved, our staff will work with partners and facilitate liaison between them and the sector to create opportunities that link business success with environmental success.

As well as helping businesses to reduce their impacts on the environment, SEPA's sector plans will deliver the ambitions set out in many SEPA and for example, Scottish Government policy frameworks and strategies, including the River Basin Management Plan¹ the Waste to Resources Framework², the Energy Framework³, Climate Change Commitment Statement⁴ and the Flood Risk Management Strategies⁵.

We want to bring together skilled, experienced and innovative people from across the sector to understand key challenges and opportunities to create innovative solutions. If we get this right, it will mean that the environment is not seen as a constraint, but a platform on which economic and social success can be built, putting the leather sector on a pathway to becoming a one planet sector.

¹ www.sepa.org.uk/environment/water/river-basin-management-planning/the-current-plans/
² www.sepa.org.uk/media/219528/one-planet-prosperity-a-waste-to-resources-framework.pdf
³ www.sepa.org.uk/media/383806/sepa_energy_framework.pdf
⁴ www.sepa.org.uk/media/369292/climate-change-commitment-statement.pdf
⁵ <http://apps.sepa.org.uk/FRMStrategies/>



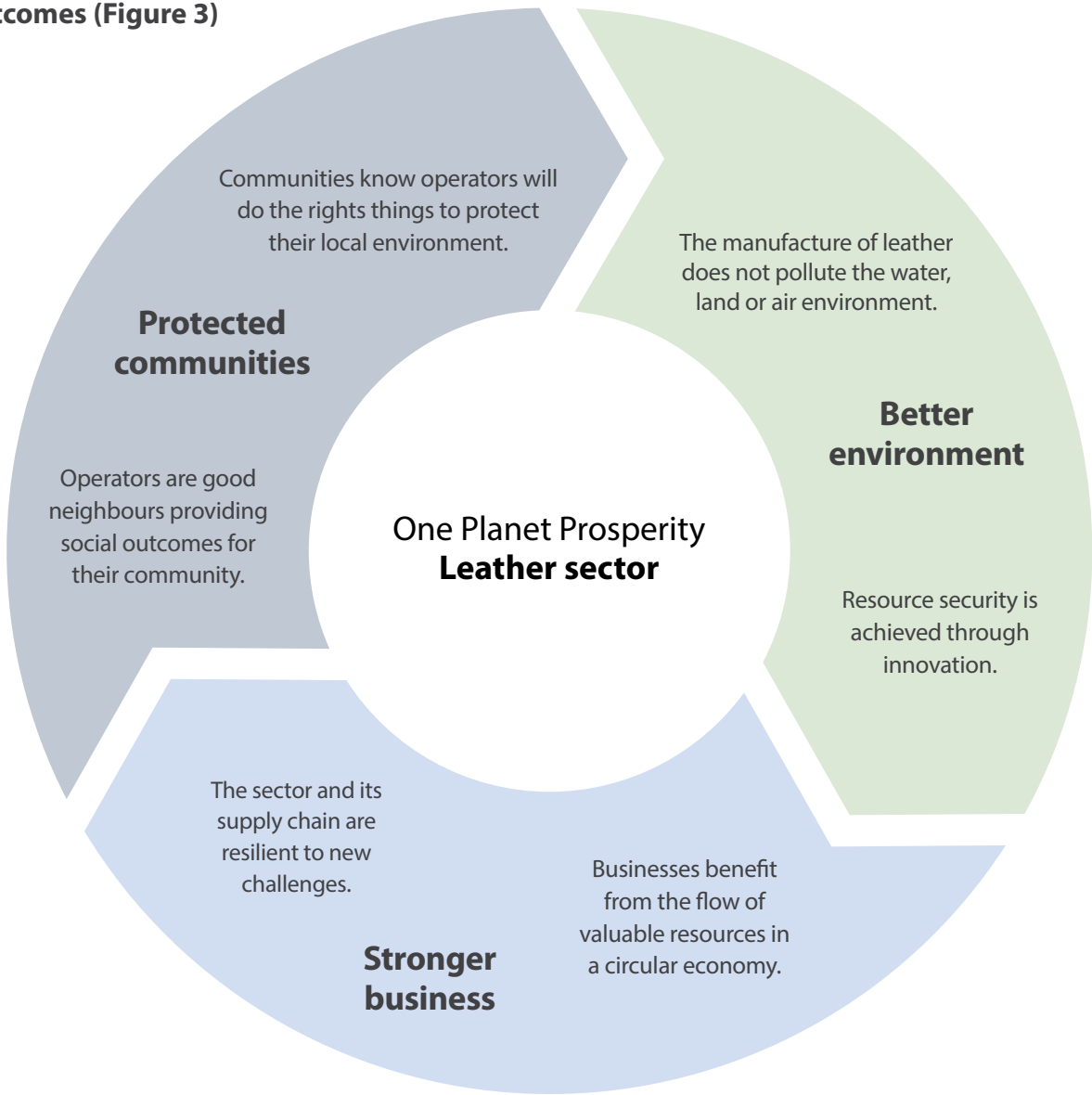
3. Outcomes

If we achieve the vision we have set out in this plan, we expect that we will help to:

- protect and improve the environment;
- protect communities;
- further enable businesses to operate effectively and successfully in their markets.

The figure below shows the outcomes we would like to help the leather sector achieve, these are linked to actions that we will take as outlined in Section 6 of the plan and all contribute towards achieving United Nations (UN) Sustainable Development Goals and targets set in the Scottish National Performance Framework⁶.

Outcomes (Figure 3)



⁶ <https://nationalperformance.gov.scot/>



4. The leather sector

Leather has been a prized material for centuries, mainly due to its strength and durability. Globally, the leather sector produces 4.8 billion square feet of leather a year, which has a trade value of £78 billion^{7,8}. In a global market that is extremely competitive, the leather sector in Scotland is known for its innovation and high quality product. For example, the largest tannery group have invested in both a thermal energy and water recycling plant and an ultrafiltration plant.

In 2016, the leather sector contributed £40 million to the economy, with leather produced

in Scotland being exported to over 30 countries worldwide^{9,10}. It is used for a wide selection of products, ranging from use in the automotive and aviation industries, through to saddlery and high value bespoke apparel and accessories.

In Scotland, production is subject to the most stringent animal welfare and environmental standards, designed to meet global demand for ethically produced leather. Hides used for leather production are predominantly sourced from the UK and Ireland.

Key facts and figures about the leather sector (Figure 4)¹¹



Over 800

The amount of people employed in sector



£ 40 million

The amount contributed to Scotland's economy from the sector



40%

The amount of treated water recycled directly back into production



30%

The amount of all leather produced globally that goes towards car interiors



30

The number of countries that Scotland's leather is exported to



60%

The amount of process waste that is already reused



Awareness and consumer demand is driving towards a circular economy approach to leather

⁷ www.sciencedirect.com/science/article/pii/S0959652614011858
⁸ http://cercervis.nic.in/PDF/APR_JUN_2017.pdf
⁹ www2.gov.scot/Resource/0053/00537061.pdf
¹⁰ www.renfrewshirechamber.com/bridge-of-weir-leather-company-limited-is-named-winner-of-queens-award-for-international-trade-for-the-fifth-time/

¹¹ Sources
www2.gov.scot/Resource/0053/00537061.pdf
www.scottishleathergroup.com/Sustainability/Water_Waste.aspx
www.carkeys.co.uk/news/where-does-the-leather-in-your-car-seats-come-from

Leather tanning is a multi-stage process (Figure 5) turning raw hides, which in the UK are largely a by-product of the meat and dairy industry, into a suitable leather that can be used for many purposes. On arrival at the tannery the hides are either stored and preserved with the use of salt and/or refrigeration, or passed straight through into production. A typical tannery consists of several zones where different processes occur. These zones are referred to as the beamhouse, tanyard, post-tanning and finishing.

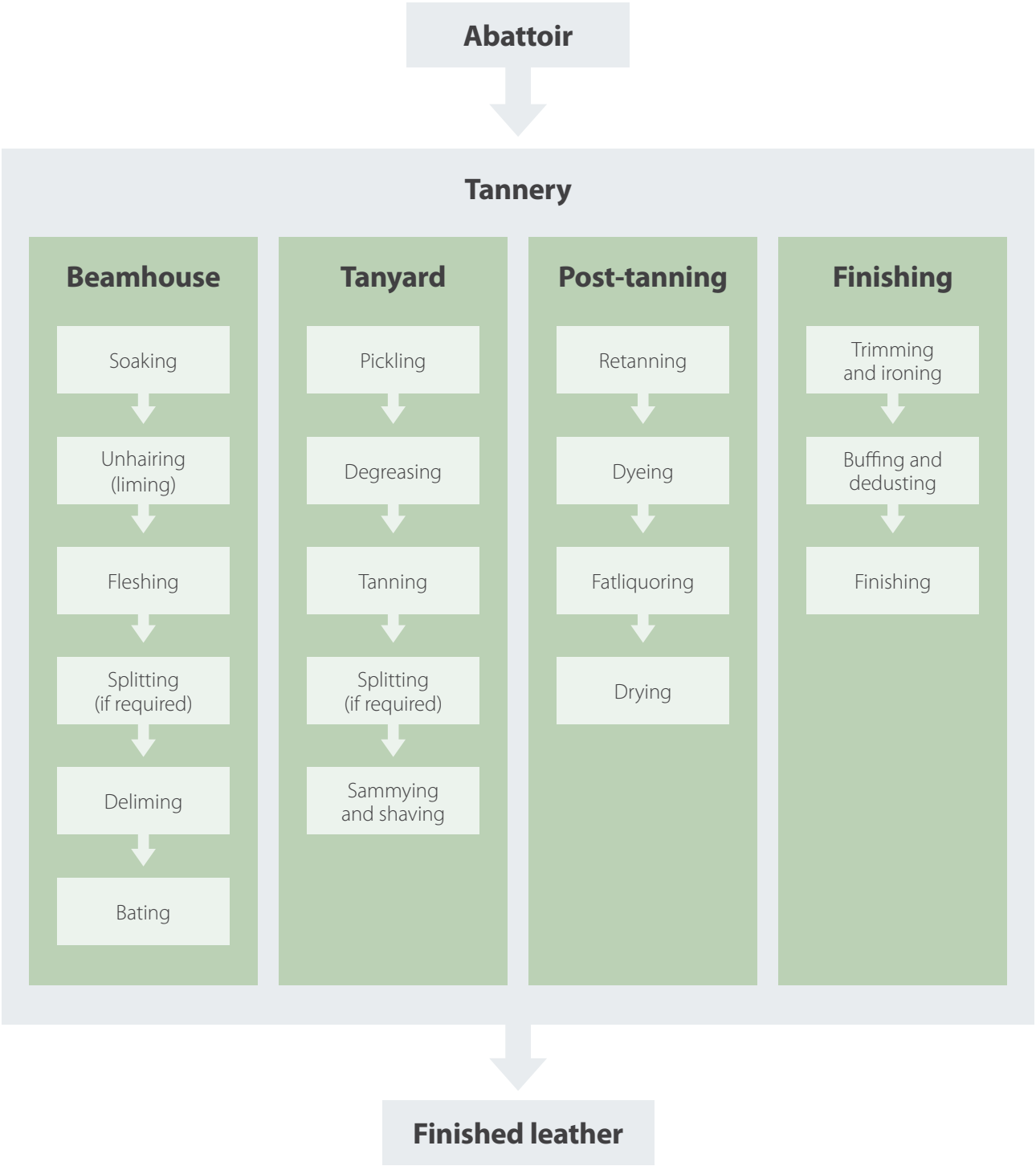
In the beamhouse, the hides are prepared for tanning by soaking to remove any gross debris and to increase the moisture content which will make the hides more susceptible to the tanning process. They are then limed, which helps remove the hair before the excess material, such as fat, is removed in a fleshing machine. The splitting phase then splits the hides into the required thickness and any remaining hair is removed using enzymes during bating. Fats and greaves are removed and passed on for further processing in a side process which results in a grease like substance, which is used as a raw material in other industries (e.g. biofuel manufacture).

The hide is now ready for tanning. In the tanyard it is treated with tanning agents, the most common of which is chromium sulphate, however vegetable tannins can also be used. The tanning agents stabilise the proteins in the hide, protecting it from decomposition. Sammying then reduces the water content of the leather and shaving produces a leather of an even thickness.

The leather now enters the post-tanning phase where it is re-tanned, dyed, lubricated with oils, dried and trimmed before it is ready for finishing. During finishing a wide range of mechanical processes including polishing, buffing and conditioning enhance the appearance and physical characteristics of the leather before finally a surface coat is added. Once this is complete the leather is ready to be turned into various consumer products.

Throughout each stage of the processes, energy is used and liquid effluent will be produced. This liquid effluent, depending on the nature and scale of the manufacture process, can be either partly treated on site prior to its discharge to the public sewer or directly discharged to the public sewer for treatment at the sewage undertakers waste water treatment works.

Leather manufacturing process (Figure 5)



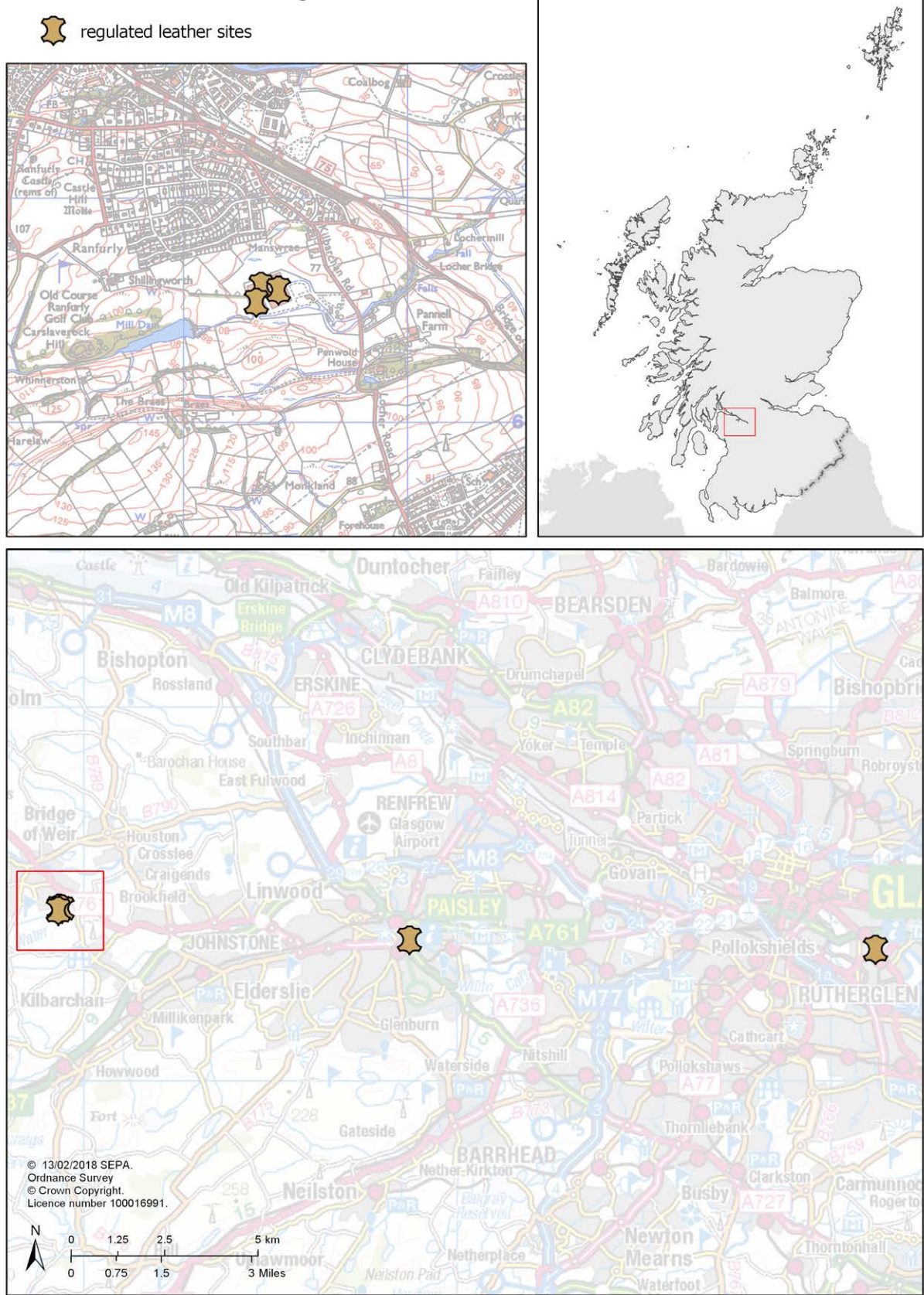
SEPA licensed sites

Over time the landscape of the Scottish leather sector has changed significantly with a steady reduction in the number of leather manufacturers. Competition has grown in the form of alternative and synthetic textile development, foreign market development and the increasing change in consumer fashion trends. Historically there would have been over 120 sites¹². Currently there are only five licensed sites and a number of smaller leather manufacturers who fall below the Pollution Prevention Control (PPC) regulatory threshold.

The five licensed sites are located within the southwest of Scotland and are all operated by the largest leather producer within the UK, employing over 600 people¹³.



Location of leather sites (Figure 6)



¹² www.electricscotland.com/history/industrial/industry16.htm
¹³ <https://beta.companieshouse.gov.uk/company/SC042020/filing-history>



5. Potential environmental impacts and how they are managed

Potential environmental impacts throughout the supply chain

The figure below describes the potential impacts leather manufacturing has on the environment:

Environmental impacts (Figure 7):

Raw materials	<ul style="list-style-type: none">■ Impacts on water, soil and air quality from resource intensive main raw material (bovine production).■ Greenhouse gas emissions from energy use in bovine production.■ Impacts on air, water and land from raw material production for hide preservation.■ Greenhouse gas emissions and air quality impacts from transportation of raw materials.■ Greenhouse gas emissions from energy use to preserve raw materials.
Manufacturing	<ul style="list-style-type: none">■ Odour and air quality impacts from manufacturing process emissions.■ Impact on water quality and ecology from indirect emissions to the water environment.■ Greenhouse gas emissions from fossil fuel used in manufacturing of leather and transportation of finished products.■ Impacts to water quality and ecology from water abstraction.
Wastes	<ul style="list-style-type: none">■ Odour impacts from waste.■ Impacts to water quality and ecology from liquid effluent containing chromium and other chemicals used in tanning and finishing processes.■ Impacts to water from sludge effluent dewatering.■ Greenhouse gas emissions from waste treatment.
Recycling and reuse	<ul style="list-style-type: none">■ Positive environmental impact from water reuse through the manufacturing process as demand is reduced.■ Positive environmental impacts from recovery and reuse of process residues and wastes resulting in a decrease in resource requirements e.g. recycling end of life leather products.■ Impacts to air, land and water from the process of recycling and reusing waste products.

Environmental regulation of the leather sector

SEPA has a number of regulatory responsibilities¹⁴, for example, under the Pollution Prevention and Control (Scotland) Regulations 2012 (PPC regulations), Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR), the EU Emissions Trading Scheme and Duty of Care. This regulatory work is supported by SEPA's partnership work and frameworks and by our role as a statutory planning consultee.

The production of leather falls within the regulatory scope of the PPC regulations. The primary function of this regime is to protect the environment from a range of specified operations. There are a number of different leather tanning and finishing businesses across Scotland. However there are only five leather sites that currently operate at a capacity which is higher than the threshold requiring a permit from SEPA, with many falling well below this limit.

Where the industry abstracts water to use within their process, this is regulated under the CAR.

The Energy Savings Opportunity Scheme Regulations 2014 (referred to as ESOS) affects all UK organisations with that organisation employ 250 or more people, have an annual turnover in excess of 50 million euro, and an annual balance sheet total in excess of 43 million euro then the organisation will have to comply with the ESOS requirements. Part of the requirements include energy audits which should identify energy saving opportunities.

Duty of Care^{15,16} compliance is important as it promotes good environmental practice at all stages of the waste management chain. It ensures that waste goes to the right place, avoiding illegal disposal and environmental harm, and promotes high quality recycling. SEPA will help businesses to understand their Duty of Care and make compliance as easy as possible.

EU exit

Around 80% of environmental legislation in Scotland originates from the European Union. As the UK leaves the EU, changes will, where necessary, be made to domestic legislation to ensure that the standards of environmental protection we enjoy today and the principles upon which they are based are maintained. Therefore, while some of the detail of the legislation we use to regulate may change, our work to protect Scotland's environment will not. Our commitment to tackling non-compliance with environmental laws and, where necessary, taking enforcement action will not diminish as a result of the UK leaving the EU.

Wider influences on environmental performance of the leather sector

Full compliance with environmental regulations will not, by itself deliver the transformational change required to secure our One Planet Prosperity objectives. The Leather Sector Plan needs to further unlock the potential for businesses to gain strengths in resource efficiency and environmental innovation that will help them to succeed in their markets.

To secure full compliance and help as many businesses as possible to move beyond compliance, we will develop our relationships with partners and other stakeholders.

Figure 8 summarises the main organisations that influence and are influenced by operators in the leather sector. It also identifies those that we may work with in both the short and longer term. As we implement the plan we will consider the opportunities these relationships provide and how we would like them to develop.



¹⁴ www.netregs.org.uk

¹⁵ www.legislation.gov.uk/ukpga/1990/43/section/34

¹⁶ www2.gov.scot/resource/0040/00404095.pdf

Key influences on the leather sector (Figure 8)





6. Tackling non-compliance and taking opportunities to go beyond

Compliance¹⁷ with environmental law is non-negotiable and regulated businesses in the sector need to comply.

Compliance in the sector

Leather manufacturing is a complex process with multiple environmental considerations that requires careful management and due diligence.

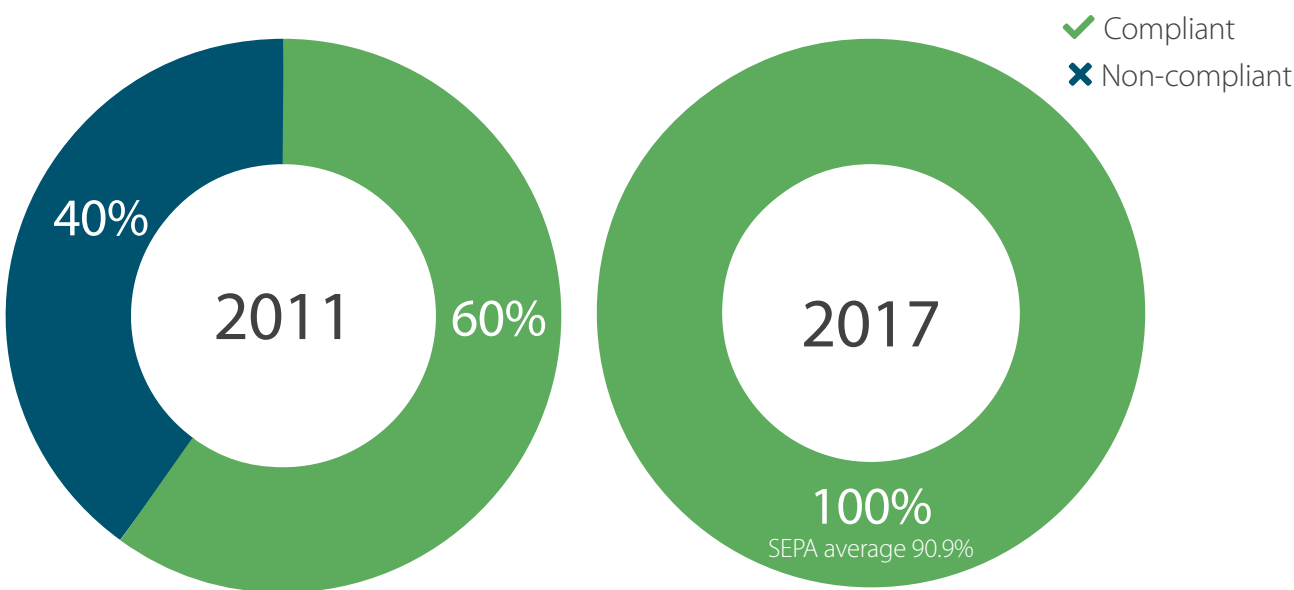
Over the last seven years compliance with PPC permit conditions has improved significantly due to investment in new technology and infrastructure. This has made a significant impact on the odour footprint at regulated sites resulting in near excellent compliance.

A large amount of odorous waste effluent is produced during the manufacturing of leather.

It is either treated on-site within a biological treatment plant before being discharged to the Scottish Water sewer, or discharged directly to Scottish Water sewer under a trade effluent licence. On-site treatment also allows for the recycling of water back into the process, reducing water supply needs. Air emissions (dust and solvents) from the finishing process are passed through abatement plant to meet the emission limits of PPC permits.

There is also 100% compliance with Controlled Activity Regulations (CAR) licensing regime.

Compliance in the leather sector for 2011 and 2017 (Figure 9)



Key issues contributing to non-compliance (2011)

- Odour complaints
- Non-conforming air emissions

¹⁷ Compliance with environmental authorisations is currently measured by our Compliance Assessment Scheme. This scheme is currently being reviewed.

Key issues contributing to non-compliance

The Scottish leather sector as a whole has a good compliance record and has been getting better over time. Over the last seven years the areas of non-compliance related mainly to:

- substantiated odour complaints received and investigated by SEPA;
- air emissions failing to meet the permit emission limits.

We will help responsible compliant businesses to operate by making it significantly harder and more expensive for those who persistently fail to comply with environmental legislation to operate. We will achieve this by increasing scrutiny, prescription, fees and the use of enforcement and monetary penalties.

How we will fix remaining compliance issues

SEPA will:

- continue to explore odour management with both the sector and partner organisations;
- continue to review site permits to ensure they are fit for purpose;
- provide appropriate support to those within the sector who pro-actively engage with community groups.

Where are the opportunities to go further?

We believe that those societies and economies that are low resource use, low energy use, low water use and low waste will be the most successful in the 21st century. Businesses that are the most innovative will best rise to the challenges of our time, such as over use of resources and climate change and create sustainable economic growth.

In this section we describe opportunities and our aspirations to help businesses do more for the environment by building upon current good practices and choosing to move beyond compliance; because it makes sense for them to grow in a sustainable manner. Many of these opportunities will also help to improve compliance by businesses in the leather sector.

Water

Water in the right place, in the right amount and of the right quality underpins Scotland’s society and economy. Our water environment provides us with vital supplies for drinking and food production; supports business, industry and tourism; maintains places that benefit the health and well-being of communities and sustains wildlife.

The sector plans aim to ensure we live and prosper within our environmental water limits; maximising the efficiency of its use; reducing the input of waste; creating better places for people to thrive and protecting and restoring habitats for wildlife. By doing so, our plans will support and compliment the ambitious targets set out in Scotland’s River Basin Management Plans (RBMPs) and Flood Risk Management Plans (FRMPs).

Water quality is important to the sector so that the process of tanning and finishing can be achieved in a consistent manner and to a high standard.

SEPA’s aspirations are:

- Work with the sector to identify partnerships with stakeholders on shared objectives to improve water management.
- Bring together experts in water innovation from across all business sectors to share experience and best practice ideas.
- With sector partner organisations, ensure the sector is resilient to climatic changes, especially around flood risk and water scarcity issues.

SEPA is committed to reducing the impacts of flooding. We have a central role in identifying and promoting the most sustainable actions to help deliver a flood resilient Scotland. We are developing a Flood Strategy that describes how we will work with partners to manage flood risk now and in the future. SEPA will continue to promote avoidance of flood risk as the priority. If risk can’t be avoided then adaptation and defence

is key. Where it is not possible to completely avoid or eliminate the flood risk then SEPA will give communities and emergency responders advance notice of flooding to help them prepare and protect themselves. To understand areas at greatest flood risk SEPA will use the best available evidence. SEPA will continue to work with partners to improve Scotland’s FRMPs. Early and strong links between this sector plan and flooding will strengthen opportunities and necessitate engagement and communication between key partners.

**Case study:
Ultrafiltration plant**

One business has put significant investment into an ultrafiltration plant treating all process liquid effluent. It recycles over 40% of daily treated volume directly back into their production. This has reduced the quantity of waste water going for off-site treatment and the amount required for using abstracted/mains water within leather manufacture.

Energy

Energy is an essential resource that enables social and economic development and is one of the most important aspects of the transition to a sustainable low carbon economy. However, electricity and heat production, transmission, storage and use can have significant environmental impacts.

SEPA’s Energy Framework¹⁸ recognises that how we use and manage our energy resources is central to our ability to live within the resources of our planet. Cost savings and other benefits for businesses can be made by improving energy efficiency and making use of low carbon sources of energy.

Leather manufacturing involves energy intensive processes throughout its production. The regulated industry has invested in energy recovery initiatives which not only reduce reliance on traditional energy supplies but reduce the carbon footprint of leather production while maximising resource recovery from a number of their waste streams.

SEPA’s aspirations are:

- With partners and the sector, explore further potential efficiency savings and innovative ways to produce leather whilst reducing the environmental impact.
- Help businesses recognise the opportunities to choose energy sources which are not only low carbon but also have minimal associated environmental impacts, not only in their own processes but also throughout their supply chain.
- Work with partners and business to identify where opportunities might exist to minimise environmental impacts associated with energy use.
- Use our partnership opportunities to help business access advice and guidance and use our regulatory levers to drive behaviours that support low carbon energy use.

Case study:
Thermal energy plant

One site contains a bespoke pyrolysis plant, converting a proportion of their solid wastes into a valuable energy. A synthesis gas is produced; burned to generate heat and then used to make steam which is put directly back into the leather manufacturing process.

Benefits:

- Less waste sludge disposed via landfill.
- Reduced reliance on mains gas used.
- Carbon reduction of leather process.
- Financial savings.

Materials

SEPA views the circular economy as a game-changing opportunity to manage resources within planetary limits. Our Waste to Resources Framework¹⁹ recognises that reducing the harms associated with waste management can create economic opportunities.

We must dramatically cut waste production across the leather sector, recover more and dispose of only the very minimum. Where waste leather and by-products are produced, we will always seek to facilitate the productive use to help achieve the outcome of our Waste to Resources Framework and strong environmental protection.

Resource efficiency can improve productivity and reduce costs for the leather sector. It can bring environmental improvements and reduce our reliance on virgin raw materials.

The regulated leather sector have already taken steps to prevent, recover and reuse materials at each stage in their process. Much of this is carried out on site, either converting to energy or other valuable materials; reducing the amount sent to landfill for disposal.

SEPA’s aspirations are:

- Initiate discussions surrounding zero waste with partners identified in the influence map and related sector plans.
- Work with the leather sector and others to explore the reduction in chemical use within leather manufacture.

Circular economy

Due to a globalised market single use products became the norm, however this trend is turning due to an increased and widespread awareness of environmental issues. When leather products have come to the end of their life they are still a high value material. We will initiate discussion between the sector and other sector supply chains to explore end of life leather reclamation as an alternative to disposal.

SEPA’s aspirations are:

- In partnership with others, explore the potential for a leather take back scheme.
- Work with partner organisations to explore potential leather clothing banks and the infrastructure to support this.
- Facilitate discussions on the use of leather manufacturer’s high protein content material residues as a raw material within the pet food industry and other sectors.

¹⁸ www.sepa.org.uk/media/383806/sepa_energy_framework.pdf

¹⁹ www.sepa.org.uk/media/219528/one-planet-prosperity-a-waste-to-resources-framework.pdf

Non-permitted leather manufacturers

Given the nature of leather manufacture on a smaller scale, there are potentially real opportunities that could be explored which would result in a benefit to both the environment and these organisations.

SEPA’s aspirations are:

- Increase our knowledge of leather producers that are below the PPC regulatory threshold.
- Facilitate discussions between trade bodies, partner associations and those sites which we do not regulate under the PPC regime.
- With partners and the sector explore potential efficiency savings and innovative ways to produce leather whilst reducing the environmental impact.





7. Summary of actions and aspirations

The following table summarises the actions that we have described in previous sections to address non-compliance in the sector and aspirations to help businesses take opportunities to go beyond compliance. These are described according to the key outcomes introduced in Section 3 that we would like to achieve for this sector.

The table below combines actions to address compliance and to help achieve beyond compliance. This is to illustrate that the same action can often both improve compliance and help a business to move beyond compliance. Similarly, actions that businesses choose to take to move beyond compliance can improve their compliance with environmental regulations.

We will prioritise them alongside those in other sector plans and progress powerful actions that contribute towards achieving our one planet prosperity goal for Scotland.

Better environment	
Outcome sought	Actions and aspirations
The manufacture of leather does not pollute the water, land or air environment.	1. Continue to explore odour management with both the sector and partner organisations.
	2. Continue to review site permits to ensure they are fit for purpose.
	3. Work with the sector to identify partnerships with stakeholders on shared objectives to improve water management.
	4. Work with the leather sector and others to explore the reduction in chemical use within leather manufacture.
	5. SEPA will help businesses to understand their Duty of Care and make compliance as easy as possible.
Resource security is achieved through innovation.	6. With sector partner organisations, ensure the sector is resilient to climatic changes, especially around flood risk and water scarcity issues.
	7. Help businesses recognise the opportunities to choose energy sources which are not only low carbon but also have minimal associated environmental impacts, not only in their own processes but also throughout their supply chain.
	8. Work with partners and business to identify where opportunities might exist to minimise environmental impacts associated with energy use.

Stronger business

Outcome sought	Actions and aspirations
The sector and its supply chain are resilient to new challenges.	<p>9. Bring together experts in water innovation from across all business sectors to share experience and best practice ideas.</p> <p>10. With partners and the sector, explore potential efficiency savings and innovative ways to produce leather whilst reducing the environmental impact.</p> <p>11. Initiate discussions surrounding zero waste with partners identified in the influence map and related sector plans</p> <p>12. Use our partnership opportunities to help business access advice and guidance and use our regulatory levers to drive behaviours that support low carbon energy use</p>
Businesses benefit from the flow of valuable resources in a circular economy.	<p>13. In partnership with others, explore the potential for a leather take back scheme.</p> <p>14. Work with partner organisations to explore potential leather clothing banks and the infrastructure to support this.</p> <p>15. Facilitate discussions on the use of leather manufacturer's high protein content material residues as a raw material within the pet food industry and other sectors.</p>

Protected communities

Outcome sought	Actions and aspirations
Communities know operators will do the right things to protect their local environment.	<p>16. Increase our knowledge of leather producers that are below the PPC regulatory threshold.</p> <p>17. Facilitate discussions between trade bodies, partner associations and those sites which we do not regulate under the PPC regime.</p>
Operators are good neighbours, providing social outcomes for their community.	<p>18. Provide appropriate support to those within the sector who pro-actively engage with community groups.</p>



