

## **Submission from Aberdeen City Council**

Aberdeen City Council welcomes the opportunity to comment on the draft Zero Waste Regulations laid before Parliament on 15 March 2012.

As stated in our previous response on the policy statement, the Council welcomes the general thrust of the regulations and believes that the changes they will introduce will, in time, achieve a sustainable waste and resource management system in Scotland.

The regulations will introduce significant additional costs in the delivery of waste collection services, especially for urban authorities in respect of food waste collections, however, some mitigation will be available for authorities that maximise reuse and recycling through reduced landfill/treatment costs.

The regulations will also require substantial investment in waste treatment facilities across the industry. Funding this investment will be a major challenge in the current economic environment. Financing the changes represent a very real risk to the achievement of the Government's aims. To mitigate this risk, the Government should review its current limited funding commitment to Zero Waste, including consideration of allocating capital resources to local authorities and being a funder-of-last-resort for infrastructure investment.

Aberdeen City Council wishes to make comment on four elements of the regulations.

### **1. Separate Collections of Recyclables by 2013**

The timeous delivery of infrastructure will be vital for the Scottish waste and recycling industry to comply with the 2013 date for separate collection of recyclable wastes in particular and Aberdeen City Council remains concerned about the timelines proposed. Without appropriate infrastructure for commercial waste arisings in particular, there is a risk that producers will not be able to procure separate collections services without excessive cost or excessive complexity.

### **2. Pre-treatment of Waste Prior to Landfill**

The Council believes that the requirement to remove recyclables prior to EfW should also been applied to landfill. This simple addition would, as well as providing consistency, remove a potential loophole whereby recyclable materials are not removed prior to landfill on economic grounds. It is hoped that there will be a financial imperative to remove recyclables but in order to ensure that we derive the greatest value from materials we should not leave this to the whim of market forces.

### **3. Quality of Materials Collected for Recycling**

We welcome the move by the Scottish Government to drive up Materials Recycling Facility (MRF) output standards to achieve high quality for the reprocessing industry rather than just focussing on inputs. This approach reflects a growing understanding of the complexity of the recycling industry. This complexity will only increase as the industry searches for more and varied materials for recycling and move away from the low-hanging fruit of suburban recycling services. Encouraging quality throughout the recycling chain is important but the most important point in achieving high quality is at the door of the reprocessor.

Modern, purpose designed MRFs and specialist sorting facilities are now capable of achieving high quality from commingled recyclables and so, the thrust of regulation should be to ensure quality not prescribe methods.

### **4. Recycling Collection methods**

There has been much debate of the relative merits of 'kerbside sort' and commingled recycling collections. Aberdeen City Council welcomes the approach adopted in the regulations, which in our view takes a pragmatic rather than dogmatic approach to a complex challenge.

It is Aberdeen City Council's experience that kerbside sort systems can and do work well in suburban areas where there is space for the storage and presentation of multiple waste streams. This is not the case in many parts of our city where people live at high density, where space is at a premium and where individualised collections are not possible. In more deprived, socially excluded and high density areas such as tenements, flatted developments, and high-rise blocks, a more pragmatic approach is required to achieve high levels of recycling. For these housing types, communal on-street collections or the use of dedicated communal bin stores are the only service options.

The space available for multiple bins in these areas is limited and certainly not sufficient to provide a refuse bin and a minimum of 5 recycling bins (as is typically the case in kerbside separation systems) close to the front door of every property. There are, in our experience, two practical choices for authorities in these areas:

1. To reduce the number of recycling bins by commingling recyclables such that each household has no further to travel to dispose of these wastes than it has to for residual waste (i.e. a similar quality of service to those living in single properties) or,
2. To require householders to use larger neighbourhood Recycling Points (typically referred to as a 'bring' system).

The density of provision of such 'bring' facilities is greatly hampered by space limitations in high-density housing areas, meaning that householders will, on average, have to travel significant extra distance to access a Recycling Point compared to their communal residual waste container.

As a result of the lack of convenience, the use of Recycling Points compared to a kerbside or near-entry service is much lower, in our experience by a factor of 5-10.

So, provision of source separated services in these areas will produce much lower volumes of recyclable materials than in the suburbs. By comparison, commingled collections that can be provided very close to the householder will see much higher participation.

By way of illustration, the following table shows the potential adverse effect of taking a dogmatic 'kerbside sort' approach for glass collections in high-density areas compared to commingling:

<b>Source</b>	<b>Participation</b>	<b>Re-melt</b>	<b>Aggregates</b>	<b>Landfill/EfW</b>
Commingled with 90:10 colour separation	60%	54%	6%	40%
Bring	10%	10%	0	90%

The performance of the colour separation technology in the commingled system can be debated but it is clear that bring systems do not capture anywhere near as much glass as a near-doorstep commingled system and so, if moving waste up the hierarchy is the objective of our waste collection system, then we should be encouraging capture of recyclable materials first and then working to ensure the best systems are applied to achieving 'high quality' recycling in the processing chain.

The committee is urged not to amend the regulations to require greater source segregation.

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