

## **Submission from British Hospitality Association**

The British Hospitality Association (BHA) Scotland welcomes the opportunity to submit evidence to the RACCE Committee regarding the Scottish Government's Policy Statement on Zero Waste Regulations. We have a number of concerns about the proposed regulations and the effect that these will have on the hospitality sector.

BHA Scotland represents the hotel and hospitality sector in Scotland. We met with Scottish Government officials to discuss the proposals when they were first announced, but while we wish to work in partnership with the Scottish Government to reduce waste, we have failed to be convinced that sufficient recognition has been given to the cost demands and inconvenience that these regulations will impose on the industry. Indeed in England we have responded positively to the voluntary agreement proposed by WRAP in its recent consultation document which sets out targets for recycling and reductions in Food Waste for the sector with a view to aspiring to zero waste to landfill. We would therefore urge you to reconsider your regulatory approach and engage with industry on the approach taken in England as this is more likely to be effective and ensure even handed treatment for multi site businesses who trade across the UK.

### *Potential costs*

The BHA's principal concern relates to the potential cost to the industry, which will be significant for smaller hotels, guest houses, B&B's, caterers and restaurants. We are aware of the following key information regarding Costs and Practical Issues:

- We have consulted with other interested parties and estimate that there was 255,000 tonnes of commercial food waste in Scotland per annum, circa 700 tonnes per day. 35,000 tonnes of food waste currently goes to sewer via 2,200 commercial Food Waste Disposal units. If 35,000 tonnes has to be collected after 2013, the processing capacity in Scotland is inadequate therefore it will go to landfill.
- This segregation of waste for separate collection will be mandatory for Scotland's 17,000 commercial and public sector catering establishments including 6,000 restaurants, pubs and hotels. It will also affect a further 2,000 snack bars, cafes and take-aways and will be imposed regardless of any other arrangements establishments may already have in place to process their own food waste, to avoid sending it to landfill. We would urge a detailed study on the economic impacts of the proposed regulations on these businesses even with the proposed delay to 2015 for SME's
- A practical example of the costs of the proposed regulations is provided by the use of Food Waste Disposal units at a semi open prison, holding just under 400 inmates (Morton Hall), saving the prison service over £12,000 p.a. The proposed ban will have significant costs for businesses both in the private and public sector.
- We are concerned about the frequency of collection, servicing of Highlands and Islands establishments, food waste storage conditions, potential pest

problems, the impact on hygiene in hospitals and other food premises, and the potential for illegal dumping with all the associated costs that will bring.

We are not convinced that the Scottish Government has engaged in a thorough enough examination of the potential costs to the industry. The Business Regulatory Impact Assessment (BRIA), for example, has only very limited examples (in annexe 4 case studies of the BRIA) of how the costs could affect the industry and, at that, only show a positive impact example. We do not believe that this is sufficient and fails to recognise the wide ranging scale and nature of the industry. We believe that more rural (often family-run) hotels and restaurants will be particularly badly affected by the proposals in terms of costs.

### *Flexibility*

We are also concerned about the lack of flexibility in the regulations. For example, by banning food waste disposal units, which are a significant capital outlay for smaller establishments, the Scottish Government is going down a very prescribed route for waste disposal. We are not aware of the full justification for this policy and how it compares to policies on the use of waste disposal units in other parts of the UK, which we gather is different. For those businesses which have invested in waste disposal units, we believe that they should be permitted to retain them in order to ensure that their capital has not been wasted through changes to government regulations. Banning these units will, in all probability, require alterations to plumbing in kitchen premises.

We welcome the Scottish Government's decision not to implement the regulations for small businesses until 2015. However, we still believe that the regulations will impose an unnecessary burden on Scottish businesses which have already faced higher business rates as well as inflationary pressures over the past year at a time when consumers are exercising great caution.

We have noted that the Scottish Government appears to be taking a different approach to that being pursued in England and Wales. We are concerned that these measures will place Scottish establishments at a competitive disadvantage to those south of the border.

We hope that you will ensure that the hospitality sector is recognised as being one of the most affected parties by these proposed regulations and that the Committee asks the Government to look at the impact on this sector in greater detail.

Yours sincerely

Calum Ross  
Chairman, BHA Scotland Committee