

Additional written submission from COSLA

COSLA welcomes the opportunity to provide written evidence to the Rural Affairs Climate Change and Environment Committee on the Draft Waste (Scotland) Regulations 2012.

COSLA recognises that the Regulations must balance local flexibility whilst providing a degree of certainty following the principles of Better Regulation.

COSLA welcomes the transitional periods and longer lead in times for separate food waste collections and the ban on biodegradable waste to landfill. Councils will need time to develop locally appropriate services - from remote rural areas to densely populated and flatted areas – all Councils will have local delivery issues to overcome. COSLA is hopeful that the timescales outlined in the Regulations will allow our Member Councils the time to develop and optimise their local services, as well as allow time for their communities to adjust and take-up these transformational services.

COSLA welcomes the flexibility in the Draft Regulations; in particular as the Regulations do not prescribe a collection method or processing technology. Councils across Scotland have shown that both co-mingled and separate kerbside systems can deliver high capture rates, and good quality materials for market. COSLA encourage the Committee to keep a close eye on developments to ensure that the Regulations and the supporting documents encourage and enable the opportunities for inward investment and job creation that realising the Zero Waste vision could bring to Scotland.

Given the scale of the paradigm shift required to achieve the vision of a Zero Waste Scotland over the next few years, COSLA would welcome the further supporting guidance and standards to come forward as soon as practicable following the Regulations. In particular, the publication of the Waste Hierarchy Guidance and the Materials Recovery Facility Quality Standards will provide some clarity on the definition of 'high quality' recycling as outlined in the Draft Regulations. COSLA also hopes that the Committee promotes the idea of extending Producer Responsibility.

Finally, COSLA and our Member Councils, look forward to the Scottish Government bringing bring forward further legislation to revoke the Landfill Allowance Scheme in accordance with the Zero Waste Policy Statement.

COSLA believes that the work of the RACCEC is critical to ensure that a stable legislative framework is achieved for Scotland, and look forward to the Committee's concluding report, final recommendations and the decision in Parliament.