

Submission from East Lothian Council

East Lothian Council welcomes the opportunity to comment on the Scottish Government's Policy Statement on the Zero Waste Regulations published on 14 October 2011.

East Lothian Council has already made substantial progress in the area of waste reduction, re-use, source-segregated recycling and composting, and intend to continue to push for further improvements where it is practicable to do so.

The Council met the 40% recycling target and has managed to secure capacity at facilities that can provide treatment, value recovery as well as final secure disposal of the residual waste in line with the Governments stated Zero Waste ambitions.

We welcome the additional information provided in the policy statement. There has been a substantial amount of time passed since the initial announcement of Zero Waste in 2008 and a number of different inceptions of how this was ultimately to be achieved. While we appreciate that Government has listened to concerns raised by local authorities in a number of areas and the policy statement reflects this, we would now like to see the regulations laid in a timely fashion so we can make the decisions about service changes, budgets and communicate all of this with our service users knowing exactly what we will have to legally provide.

As with other local authorities we have many competing pressures on our budgets and while we welcome the longer lead in time to introduce a food waste collection service to allow us time to develop new services, reshape existing services and engage with service users, we would question if introducing an additional collection service is the best use of public money in the wider context of cuts to budgets and other local services.

Other concerns would be the additional burden being placed on the Council with regards to having a statutory obligation to provide recycling services for local businesses. Our overheads mean we are unable to compete with the private sector who can vary their level of charging depending on whether they want to provide a business with the service allowing them to select the business that will be the most profitable. Again this would be another additional collection service that would need to be funded without any additional capital being made available.

We would also ask that full training is made available to those officers for whom additional enforcement responsibilities are expected as well as clear powers to ensure compliance with the new Duty of Care expected from businesses.

With respect to the proposed bi-annual report on recycling destinations – the Council does report via waste data flow the types of material collected and the destination to which each of these materials are sent.

We would also like clarification on the Carbon metric as no mention of this was made within the policy statement, while as an authority we feel the is metric is essentially flawed and is not the correct way to measure the recycling rate if we are going to have to use this to achieve targets we do need to have clear information so this can be relayed to the public.