

Submission from East Renfrewshire Council

Policy Statement - Zero Waste Regulations

1. The Policy Statement makes many references to the value of recyclates captured within Residual Waste e.g. “£100 million of untapped resource”, and the need to prevent incineration becoming a new form of landfilling “hindering opportunities to capture and recycle high quality materials”, yet there is no targets sets for recovering materials from the residual waste once, for example, 50% household recycling targets are met. While the document states the Regulations intention to “maximise the amounts of material available for recycling” and “minimise the need for residual waste management capacity”, it is clear with all the high profile procurements currently underway that this will not be the case, and the Regulations may come too late for some procurements. If it is truly the Governments intention to regulate and control the treatment of residual waste and set targets for the pre-sort of residual waste then Authorities should know now, so that they can build them in to current procurements. Most of these plants are only offering between 5-10% recovery on residual waste, which means 90-95% of all residual material is effectively being thermally treated – is this really the aim of the Zero Waste Policy?
2. It is dangerous to be too prescriptive on what type of technology should be used for treatment of organic waste, and the folly of this can be seen throughout the country in contracts which were influenced by Government which are no longer fit for purpose! The debate about whether AD or IVC is the better form of treatment should be left to Authorities to conclude knowing all local circumstances. In addition, current procurement rules make it very difficult to promote one technology over another, and the Government should seriously consider the undue promotion of AD over IVC in several parts of the policy. The Policy also states the need to divert residual waste material from landfill because of greenhouse gas emissions, yet promotes the use of open windrowing for segregated garden waste! - what about the completely uncontrolled greenhouse gas emissions from this type of process?
3. There is no mention of the Carbon Metric in this Policy. Although I believe the current metric to be fundamentally flawed, it is surprising that it has not been mentioned in the document? Has it been abandoned?
4. It appears to me that the policy has been unduly influenced by particular industry sectors e.g glass, waste water and AD, which is not healthy for competition and will not give best value to authorities procuring these services.
5. Placing Regulations to force Local Authorities to provide recycling services for local businesses may not be in the interest of either the

authorities or the businesses. Although it is a competitive market and businesses can pick and choose their supplier, Local Authorities overheads will mean that recycling services will not come cheaply, despite public expectation. The legislation should make some flexibility for authorities to contract recycling services to a third party where it makes commercial sense to do so (unlike the current commercial waste regulations).

6. Although it is promoted that Environmental Health Officers will check compliance in terms of Duty of Care for business premises, which I agree is the best way of doing so, who will actually check that declared tonnages are accurate? And who will enforce false accounting of waste from premises? This would be beyond the capabilities of either the EHO's or other local authority staff and I would recommend that SEPA should be considered for this role.
7. On what basis should co-mingled collections have to prove they are at "equivalent or better" than segregated collections of food and garden waste? I would dispute that they are any less environmentally friendly or less cost effective, and I have seen very little evidence to support that statement. If co-mingled materials are used e.g. as a peat replacement, will this turn the tables? Will segregated collections thereafter have to prove they are better or equivalent to segregated – this should be re-thought!

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