

Submission from Fife Council

1. Fife Council

Fife Council is Scotland's third largest local authority and the eleventh largest unitary authority in the UK, with a population of approximately 370,000 people living in 167,000 households.

The council is committed to sustainable waste management and recently adopted a revised Zero Waste Plan that commits the council to recycling 60% of household waste by 2014, rising to 70% by 2020.

The council has made enormous strides in waste management performance over the last ten years, increasing municipal solid waste recycling performance from less than 5% in 2001/02 to a projected 55% in 2011/12. Household waste recycling for the current financial year is forecast to be circa 54%. At nearly 140,000 tonnes per year, the council currently recycles more waste in absolute terms than any other UK waste collection authority other than the City of Birmingham.

The council's leading position in sustainable waste management has been the product of elected member and senior executive commitment, innovation, investment, and extensive stakeholder engagement.

2. The Waste (Scotland) Regulations

Fife Council welcomes the Regulations and supports the philosophy that underpins them. We believe that they represent a challenging but pragmatic regulatory approach to deliver key elements of the national Zero Waste Plan. They will, we believe contribute to a step change in the conservation of resources by ensuring that waste that is produced, and which has hitherto been regarded as having little or negative value, is treated as a resource from which maximum value should be secured.

The obligations placed on councils and others who produce and manage waste are challenging. The legal requirement to provide for the recycling of a wide range of materials, and for the separate collection of food waste by prescribed dates will require swift action on the part of councils and others. It will also result in increased costs in the short term, especially with respect to the provision of additional storage containers. However, the target dates for the introduction of separate storage and collection of materials do not seem to us to be unreasonable or unachievable. With respect to costs, we believe that for the most part, short term increases will be outweighed by long term financial benefits arising from savings on disposal and landfill tax, from the sale of new commodities recovered from the waste stream, and from the generation of renewable power and heat from the anaerobic digestion of food and garden waste.

We welcome the pragmatic approach that is being taken with respect to the storage and collection of recyclates and food waste. The Regulations rightly focus on the quality of materials that are to be taken to market but do not require the separate storage and collection of individual commodities where co-collection and transport does not compromise the quality and quantity of individual commodities. We believe that this strikes a reasonable balance between storage and collection issues (viz

costs, space for multi containers and the possible requirement for investment in new or different vehicles), and quality. We particularly welcome the fact that councils will be able co-collect food and garden waste where they are satisfied that the amount of food waste collected this way would not be less than under a food waste only collection service.

We acknowledge that new infrastructure will be required to sort, treat and incinerate waste if the obligations set out in the Regulations are to be discharged, and note that there is no guarantee that all of the infrastructure will be in place in time. However, we believe that the Regulations send a clear signal to the market of the Scottish Government's intent, and we have a reasonable degree of confidence that the new regulatory landscape will provide developers with confidence to invest. There is evidence of this already, with the development of MRF and Anaerobic Digestion infrastructure, and with a number of planning applications having been granted, or under consideration, for new energy from waste plants.

If we have one significant concern about the Regulations, it relates to the impact on existing landfills. There is a risk that a strict application of the landfill bans, particularly the *de facto* ban on the landfilling of unsorted and biodegradable municipal waste from January 2021 could result in a number of landfills being left with significant void space that may never be filled. As a landfill operator, this is of direct concern to Fife Council. Such an outcome could have major implications for operators, local planning authorities, SEPA, and communities who live in the vicinity of landfills. We believe that there would be value in SEPA conducting research into this to assess the scale of the risk, and to form the basis of a discussion with stakeholders on how that risk might be mitigated.