

Submission from Stirling Council

Stirling Council welcomes the opportunity to respond to the current consultation relating to the proposed regulations.

Monitoring and Enforcement

The amendment to the Environmental Protection Act 1990 is a bold approach in ensuring waste producers adhere to their duty of care. Stirling Council fully endorses this approach, however does raise concerns over the monitoring and enforcement that will ensure compliance to this amendment, particularly in relation to the collection of commercial waste. This amendment is a radical change in that source segregation will be required and will need to be carefully monitored. Without such monitoring there is a danger that the amendment will not be adhered to and will become unmanageable. Those currently responsible for enforcing Section 34 are the Waste Regulation Authority (SEPA) and Waste Collection Authorities (Local Authorities), therefore an assessment of resources should be considered to ensure sufficient monitoring takes place when the regulations are enacted, at least in the “settling in period”.

5Kg Minimum Limit

For information, Stirling Council is currently trialling the uplift of waste from commercial premises and has many participants willing to segregated food waste who produce less than 5 kgs per week, yet Section 2 (3)(b)(2G)c puts a minimum limit of 5 kgs. If the ethos of food waste being taken out at source is to reduce the risks of contamination to other resources in the mixed bin, why would such a generous limit be given to smaller businesses? Giving such a derogation to smaller waste producers will put much more pressure on the MRF suppliers and reduce MRF output quality considerably.

Ensuring Quality of Recyclates

Stirling Council fully embraces the ethos of Zero Waste Planning and welcomes all assistance from Zero Waste Scotland. Stirling Council is proud of its comprehensive source segregation system, however the benefits of a high quality market for recyclables would be much better served if more high quality product was source segregated in Scotland to allow better domestic market to develop and minimise the amount to resource being sent out of the country. Accordingly, Stirling Council would like to know how the Scottish Government will ensure that the highest possible quality standards are to be achieved and maintained by; waste producers; waste management companies and local authorities alike?

Raising Awareness and Education

High quality segregation requires all producers to be fully aware of their responsibilities. Householders in particular will now be “required” to source segregate to the best of their abilities. This will require ongoing support both in terms of monitoring and enforcement as well as educational assistance and awareness raising. Both national and local promotional education programmes will be required on an ongoing basis. A commitment from Zero Waste Scotland to support such a need would be welcomed in giving local authorities confidence to proceed.

In summary, Stirling Council welcomes the new Regulations and looks forward to continue leading the way in applying best practice in waste management policy.