

Submission from WWF Scotland

WWF Scotland welcomes the opportunity to brief the Committee on the forthcoming Zero Waste (Scotland) Regulations. A step change in our approach to resource use is required to reduce our ecological footprint and tackle climate change in line with the commitments established in the Climate Change (Scotland) Act.

Summary

- **WWF Scotland supports the Government's ambition to deliver a Zero Waste Scotland.**
- **We support proposals to ensure greater waste segregation at source, which will reduce residual waste and maximise the value of recyclate.**
- **We agree that food waste is a priority for collection, however we are disappointed at proposals to delay the roll out of some of these systems. We believe these delays will have an impact on delivery of Scotland's emission reductions as set out in the Report on Proposals and Policies.**
- **We believe the proposal to not require pre-treatment of residual waste prior to landfill will lead to significant volumes of valuable recyclable material in mixed/unsorted waste streams ending up in landfill.**
- **WWF Scotland is concerned at the weakness of the proposals to limit valuable materials being disposed of through incineration. We are not convinced that it is enough to avoid the over provision of incineration capacity in Scotland.**
- **Beyond these regulations additional measures to support increased recycling, reuse and waste prevention should be introduced to support the Government's Zero Waste ambition.**

Background

Scotland currently produces around 17 million tonnes of waste and the majority of this waste ends up in landfill. Our current patterns of resource use are unsustainable and there is an imperative to use our natural resources more efficiently and cut emissions from landfill sites. In addition it is estimated that the value of the resources contained in the household waste fraction alone are worth over £100 million.

The Government's Policy Statement on the zero waste regulations sets out action in a number of areas aimed at helping secure a zero waste Scotland. However, WWF Scotland believes that many of these actions still require strengthening.

Scotland has made good progress in stepping up the rate of household waste recycling with the latest figures suggesting that we now recycle over 40% of Scotland's household waste. However achieving a zero waste Scotland will require significant further action which focuses on;

- stepping up household recycling and composting levels to those already found elsewhere in Europe;
- achieving high recycling and composting across all waste streams to meet Scotland's 70% recycling target;

- maximising the value and reuse of materials collected; and
- cutting back amount of waste we produce at source.

Source segregation

WWF Scotland supports greater source segregation, as it helps to maximise the value of the materials collected, avoids contamination and helps deliver high recycling levels. Evidence from the paper and glass industries shows that co-mingled systems have a negative impact on the quality of the recovered paper and glass and as such reduce the environmental benefit and reuse value of these materials.

WWF Scotland supports the proposed statutory requirement for all waste producers (other than householders) to separate key dry recyclables (glass, metal, plastic, paper and card) and food at source. We also support the proposed requirement for local authorities to offer separate collection of glass, metals, plastics, paper and card to householders by 2013. In addition, WWF Scotland supports the proposed ban on mixing separately collected recyclable materials as this may compromise their recycling potential and ensure their maximum use and value.

However we are disappointed that the Government has put back the date proposed in the consultation for household food waste systems to be rolled out. Many local authorities have already successfully rolled out food waste collection systems and treatment of organic food waste through anaerobic digestions systems, with many plants already operating in Scotland. We believe that local authorities have sufficient time to roll out food waste collection systems by 2015. We are also disappointed that the regulations put back proposed dates for small businesses to segregate food waste until 2016. We believe these delays will have an impact on delivery of Scotland's emission reductions as set out in the Government's Report on Proposals and Policies.

WWF Scotland supports proposals to ban the use of non-domestic food waste disposal units where the food is discharged to sewers.

Pre-treatment of residual waste prior to landfill

Given that the Policy Statement does not propose any requirement for households to separate waste and use recycling systems where they are available the lack of any requirement to pre-treat residual waste to remove key recyclables prior to landfill risks significant volumes of valuable material being disposed of to landfill.

Landfill ban

WWF Scotland welcomes the proposed ban on separately collected materials going to landfill and incineration in 2013, to incentivise waste reduction and encourage much greater levels of recycling. However, we are disappointed that Government has proposed postponing the date for the introduction of the landfill ban for any biodegradable material to 2020. We believe that such a delay is unnecessary and that alternative options for recovering recyclable material could be in place well in advance of 2020.

Incineration

WWF Scotland is concerned at the weakness of the proposals to limit valuable materials being disposed of through incineration. The Policy Statement proposes to limit incineration by requiring separately collected material not to be incinerated and by requiring some form of pre-treatment to 'remove marketable recyclate' prior to

incineration. Given that householders only have to be 'offered' separate recycling collection facilities rather than required, we believe significant quantities of mixed waste containing valuable materials will still be collected. Whilst pre-treatment of this waste stream is required before incineration, the quality of the recyclate is likely to be relatively poor and hence limit how 'marketable' the materials are and thus act as a fairly ineffective driver to avoid incineration.

The Government appears to be progressively watering down their commitment to constrain the amount of waste Scotland could incinerate. In 2010 the Government published its Zero Waste Plan which committed to 'ensuring energy from waste treatment is only used to recover value from resources that cannot offer greater environmental and economic benefits through reuse or recycling'.

The subsequent consultation on the proposed Zero Waste Regulations in 2011 defined Energy from Waste inputs as 'wastes which have been subject to all reasonably practicable efforts to extract recyclable materials prior to incineration or co-incineration'.

The Policy Statement on the Zero Waste Regulations now simply seeks to 'ban separately collected materials going to incineration' and 'remove marketable recyclate from residual municipal waste prior to incineration.' It is unclear what, and who, will determine the definition of 'marketable' in this context.

The Policy Statement misses out a number of additional measures that WWF Scotland believes should be considered to actively drive up recycling and further limit incineration:

'Pay as you throw' schemes: Introducing 'pay as you throw' or 'variable charging' schemes for residual non-recycled or composted waste should accompany the further roll out of recycling provisions to stimulate maximum recycling and waste reduction. Research has shown that pay as you throw schemes can help significantly increasing recycling levels. In Landkreis Schweinfurt, Germany, a 43% reduction in residual waste reduction followed the introduction of variable charging, with recycling increasing from 64% to 76%. In the Treviso district of Italy, a 27% reduction in waste volume followed the introduction of variable waste charging.

Fixed Penalty Notices: Introducing fixed penalty notices should be considered to encourage people to use recycling bins correctly and responsibly. Some local authorities, such as Highland Council, have already highlighted support for the introduction of this measure.

Enhanced Producer Responsibility: Increased producer responsibility for example increased packaging targets and the use of deposit return schemes could play an important role. The Climate Change (Scotland) Act contains powers to introduce deposit return schemes. These systems have demonstrated very high take up and resulted in greater reuse, less packaging waste and reductions in litter. Examples of where such systems have already been introduced include New York State, South Australia, Germany, Sweden and Denmark. The introduction of a deposit return system in Germany resulted in 98.5% of refillable bottles being returned by consumers and Sweden's container deposit system has achieved recovery rates of 86% for cans and 77% for PET bottles.

Waste prevention plan: The European Waste Framework Directive requires mandatory waste prevention plans to cut waste volumes. WWF Scotland encourages the Scottish Government to follow the example of the Welsh Assembly Government, which introduced a target to cut household waste volumes by 1.5% per year until 2050, with a 27% reduction by 2025.