



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING
ADVISORY COMMITTEE

Consultation – Draft Municipal Sector Plan
Waste Strategy Branch,
Department for Environment, Sustainability and Housing,
Welsh Assembly Government,
Ty-Cambria,
29 Newport Road,
Cardiff.
CF24 0TP.

10th September 2010

Dear Sir/Madam,

Consultation Response – Draft Municipal Sector Plan

I am writing to present the LARAC response to the **Draft Municipal Sector Plan** Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

If you have any queries on this response or would like to discuss the matter further then please contact me on (phone) or (email).

Yours faithfully,

Roger Mills
LARAC Policy Team



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Consultation Response – Draft Municipal Sector Plan

1. Do you agree with the findings and conclusions of the Sustainability Appraisal? If no, please explain your reasons.

YES

2. Do you agree that there should be specific household waste and commercial waste reduction targets as opposed to a single reduction target for municipal waste collected by Local Authorities?

YES

3. Do you agree that all Local Authorities in Wales should adopt the service profile outlined above to help reduce the amount of household waste put out for collection?

Reduction of bin capacity – agree in principle but there will be costs associated with the change over from existing containers provided to residents. This could make many thousands of new/nearly new bins obsolete and in need of recycling which seems wasteful. New bins tend to be made from virgin plastic. Also a reduction in bin capacity can only work if sufficient recycling facilities are available from the outset.

AWC – AGREE

No side waste – AGREE; however there needs to be some flexibility during periods such as Christmas and new year to allow for the increase in residual waste produced.

Separate food waste collection – AGREE; though care needs to be taken to avoid authorities chasing food waste just to reach targets, rather than implementing waste reduction and minimisation campaigns.

Home composting – AGREE

Green waste charge – this could prove controversial particularly where a free service is already in place, and be counter-productive by forcing green waste into the residual bins, or increasing fly-tipping of green waste. Authorities may need to consider increasing 'bring' capacity for green waste.

Should the Welsh Assembly Government prescribe these levels of service provision?

NO – with the work currently being carried out by all authorities towards 70% recycling, many of the above initiatives will be required. However it must be left to individual authorities to prioritise activities depending on their own particular needs.

4. Do you agree that the actions proposed to effect behavioural change on waste prevention through awareness raising are necessary, and is there



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anything else that should be done in respect of awareness raising on waste prevention, and who should do it?

Would like to see an increased focus on waste minimisation activities such as home composting and real nappies. Each authority has their own recycling mascot and this should link in to Waste Awareness Wales' marketing materials.

Some of the responsibility for awareness raising also lies with the private sector – again as a part of extended producer responsibility.

5. Should we prioritise funding for local waste prevention projects, and how could they be organised?

NO – each authority needs to be in a position to prioritise funding as necessary. Funding could be allocated in the form of recycling credits, as well as providing trade waste recycling centres.

Again the private sector has some responsibility for waste prevention in the case of reducing excess packaging and full life cycle analysis of products.

Organisation of the initiatives could be helped by umbrella organisations such as FRN, Cylch etc.

6. Are there any further actions which you consider that the Welsh Assembly Government should take to ensure more prevention of household waste in Wales? If yes, what further action do you consider should be taken, and by whom?

Producer responsibility cannot be left voluntary. The producers also need to focus on increasing life expectancy of their products and developing repair schemes to avoid disposal.

Real Nappies need to be promoted and funded. This could be extended to include adult sanitary products and alternatives e.g. mooncup. This could be funded by putting a tax on disposables and/or making the producers of disposables responsible for the recycling of their products.

Home composting will produce savings in arisings put out for collection and as such should be heavily promoted and funded. Master Composter schemes for each authority could help.

If Local Authorities are to take on the considerable share of this awareness raising extra resources need to be made available.

7. Do you agree that all Local Authorities should be required to offer a bulky waste recycling/preparation for reuse service with a minimum number of specified types of bulky items that they should collect and prepare for reuse/recycle? If yes, what items do you think they ought to collect?



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YES – not necessarily at the HWRC, but can work closely with existing local networks for furniture recycling.

Materials to be included should be left to the discretion of each Local Authority depending on the needs of the area.

8. Should the Welsh Assembly Government provide for guidance on how Local Authorities could evaluate services in terms of social, economic and environmental benefits, including maximising social return on investment?

YES – any guidance that can be utilised to improve services is welcome.

9. Do you agree that all Local Authorities should have a least one civic amenity site/household waste recycling centre which can receive and store safely bulky items for preparation for reuse?

YES – but need to consider logistics and infrastructure requirements, particularly where space is at a premium. Additional resources would be required to upgrade existing facilities.

Could the service be better handled through 3rd sector arrangements in conjunction with FRN, Cylch etc?

10. Do you agree that it would be desirable to set up an accredited reuse and repair network? If yes, which materials or items should be the main priority for the reuse network? How could it be funded?

YES list ok on p62. Funded via recycling credits, carrier bag tax, and an element of producer responsibility.

The accreditation would need to be carefully considered so as not to be too onerous. WAG needs to consider the impact on existing charity shops.

11. Do you agree that reuse shops should be franchised and have common branding? If yes, how could this best be achieved, including how could it be funded?

YES as above funded by recycling credits, carrier bag tax and producer responsibility. Need to consider impact on existing charity shops

12. Should the Welsh Assembly Government introduce a scheme for 'preparing for reuse credits' similar to recycling credits under Section 52 of the Environmental Protection Act 1990? If yes, should such a scheme be made compulsory? If no to either question, what are your reasons for saying this?

NO – existing recycling credits already in place – may need to extend the wording to allow re-use activities.



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There is a risk that items that are currently being re-used at no cost could be diverted into re-use schemes to take advantage of the credits.

13. Subject to clarification on what can count towards recycling as defined in the revised Waste Framework Directive, it is proposed to include in the recycling figures and targets for Wales the recycling of beach cleansing wastes, rubble (deposited at HWRC and CA sites), abandoned vehicles, bottom ash from EfW plants and all other categories of waste collected by Local Authority waste collection and disposal authorities. Do you agree with this or should only the municipal wastes collected by Local Authorities that is included under the definition of municipal waste in the EU Landfill Directive be covered by the Performance Indicators and recycling targets (this would exclude, for example, abandoned vehicles and rubble)?

Agree; this will make like for like comparisons with other European countries possible.

14. Do you agree that the Welsh Assembly Government should develop proposals for recycling targets for source separated food waste?

NO – if waste prevention and home composting is hugely successful the amount of food waste is reduced, and Local Authorities could struggle to reach arbitrary targets.

15. Do you agree that there should be specific recycling targets for other materials? If yes, which ones?

NO – in order to make things simple have one target. Each authority may need to target different materials depending on current performance – in order to reach an overall 70% target a wide variety of materials will naturally need to be collected.

16. Should the Welsh Assembly Government require that Local Authorities all collect, as a minimum, a defined list of recyclable materials? If yes, what do you consider should be included in the list?

NO – as Q15 above.

17. Do you agree that there should be a star rating system to demonstrate achievement of higher standards at Household Waste Recycling Centres?

YES – although site logistics and infrastructure can impose their own limitations. A star rating system could be utilised for the development of new facilities.

18. Do you agree that householders without access to kerbside recycling services should have easy access to a bring site to recycle a range of materials? If yes, what level of provision should be stipulated?

YES – though bring sites have become problematic in some areas with increased costs to clear up fly tipping and vandalism. The range of materials to be collected will need to be decided on a case by case basis depending on other facilities available.

19. Do you agree that each Local Authority be required to provide glass colour separation bring sites to enable closed loop recycling?

NO – contamination of existing facilities is already a problem. Glass collection containers will become mixed by default. Many glass recycling companies now employ colour separation technology post-collection.

20. Do you consider that Local Authorities should all provide a comprehensive recycle and food waste collection service for businesses in their area? Or should they provide this service only for areas not well served by the private sector?

NO – this should be left to each Local Authority to decide based upon cost/benefit analysis in their areas. If there is sufficient demand in the area and LA's are able to complement existing services then they could look at the opportunities.

21. Do you agree with the proposed approaches to the efficiency savings? What further actions do you consider could be taken to achieve even greater value for money?

AGREE

It is felt that there are further actions that could be considered to achieve greater value for money namely;

- Joint procurement of goods and services
- Continued regional contracts for the sale of recyclates.
- Opportunities for regional collections schemes?
- Sharing of publicity materials, road show vehicles etc.

22. Do you consider that the Welsh Assembly Government should apply more prescriptive conditions to the provision of the Sustainable Waste Management Grant (SWMG) to ensure that the outcomes in Towards Zero Waste and the objectives proposed in this plan are delivered by Local Authorities?

NO – Local Authorities must be able to be flexible to provide services that will fit local need. Over prescribing will make services rigid and inflexible.



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Should the Welsh Assembly Government withhold part of the SWMG from Local Authorities that refuse to provide the type of services deemed by the Welsh Assembly Government to be the most sustainable?

NO - The various fines and penalties being proposed will address any issue of failing to deliver on targets.

Should payment of grant only be made on delivery of results?

NO - Payment for investment in services is required up-front.
What if everything is carried out as prescribed and results still not met?
Additionally, there should not be a difference in SWMG funding for different types of services as long as the services achieve the targets.

23. Should the Welsh Assembly Government require the payment of recycling credits by Local Authorities to third parties, and what do you see as the advantages or disadvantages of such an approach?

NO – for the reasons stated; i.e. open ended and unpredictable costs.

24. Do you agree that identifying residual household waste levels for future years is useful and will help Local Authorities better plan for residual waste treatment facility contracts?

YES

Do you agree that they should be non-binding on Local Authorities, and indicative only?

YES – it is extremely difficult to forecast future waste arisings.