



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

**DRAFT COLLECTIONS, INFRASTRUCTURE AND MARKETS SECTOR
PLAN
CONSULTATION QUESTIONS MARCH 2011**

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Date June 2011
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Are you responding to this consultation as an individual or representing the views of an organisation?

- I am responding as an individual
 I am responding on behalf of an organisation

Consultation question 1 : Do you agree with the findings and conclusions of the sustainability appraisal? If no please explain your reasons?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Option 3 - Beyond best practice - would be the obvious choice in an ideal world, but could be extremely difficult to implement, monitor and enforce in practice.

Consultation question 2: Do you agree with the proposed priority order of options for the management of the following waste streams (please indicate 'yes' or 'no' against each waste stream):

Do you agree? (Please click only one of the boxes)	comments
a) glass, <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
b) paper/card <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	For cardboard particularly - not comfortable with EfW being above composting. Gate fees, IBA and other outputs from EfW must be more damaging/costly than those from composting, not to mention the useful and valuable end product produced at



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		compost facilities
c) metals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
d) plastics	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Open loop recycling e.g. plastic wood should come above EfW. Gate fees, IBA and other outputs from EfW must be more damaging/costly than those from open loop recycling. Landfill should be the final option.
e) food, or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Given the concerns cited re:landspreading of food waste, this should come lower in the hierarchy. Home composting seems to be missing from Fig21 - to be inserted below AD. Although AD appears the best treatment option, the financial costs for Local Authorities are significantly higher than in vessel composting. In the era of 'fiscal contraction' the cheapest option needs serious consideration.
f) residual waste	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Given the higher market value of electricity, this technology should come higher in the hierarchy than a heat only option. CHP max 79% as shown in Fig22 has a good negative climate change impact. There is an argument that building CHP plants with planned dwindling feedstocks (due to higher rates of prevention, recycling and composting) will mean rising gate fees year on year. There is also public concern regarding the release of toxic chemicals from incineration of plastics.

If no for any of these, what changes would you wish to see and why (please provide evidence to back up your views).

Consultation question 3: Do you agree that it should be the role of all waste companies in Wales to provide advice to their customers on steps they can take to prevent waste? If yes, how could this be implemented?

Do you agree? (Please click only one of the boxes)	comments
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<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Waste companies have a conflict of interest here - prevention of waste will have a direct impact on their profits. Waste Prevention advice should come from outside the waste industry. Welsh Assembly Govt could extend the Waste Awareness Wales remit to include business. There needs to be greater investment or promotion for waste companies to gain accreditation with EMS e.g. ISO14001.</p>
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Consultation Question 4: Should “preparing for reuse” be included as counting towards the recycling targets set in Towards Zero Waste for industrial and commercial waste?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Although the composition charts for Industrial & Commercial waste shown in Fig2 + Fig3 show only a small proportion which could be prepared for reuse.</p>

Consultation Question 5: Do you consider that there is scope to increase the amount of reuse of wastes produced by businesses? If yes, what items should be targeted as a priority, and how could better services be put in place to achieve more reuse?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Excess food from supermarkets donated to charitable causes e.g. Fairshares. Office furniture can be re-used at third sector furniture re-use enterprises. Better services could be put in place by greater investment and promotion of schemes such as NISP, Resource Share schemes, Freecycle etc. Development of an accredited national reuse scheme could be the best way of promoting reuse.</p>

Consultation question 6: Do you agree that it is feasible for all businesses to keep each of these four key waste streams separate at source (please indicate ‘yes’ or ‘no’ against each waste stream)?





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- a) paper and card,
- b) plastics and cans,
- c) glass,
- d) food

Do you agree? (Please click only one of the boxes)		comments
a) paper and card	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Although if a Local Authority already operates a co-mingled service for residents, they may choose to provide the same for businesses.
b) plastics and cans	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
c) glass	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
d) food	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

If not, why not. Which types of business do you think will face the biggest challenges and why?

Consultation Question 7: Do you agree that the types of instruments proposed above will facilitate the further collection of recyclates from businesses to meet the targets in Towards Zero Waste? If not, why not? What other instruments could be considered, and why?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Funding for upgrading existing HWRC's would be required. In some instances where capacity is an issue development of new HWRC's would be needed.

Consultation Question 8: Would the use in WasteDataFlow of a standard default percentage for rejects help local authorities that are unable to obtain accurate figures for reject rates? If your answer is 'no', what other mechanism could be applied to ensure the accurate reporting of reject rates from all facilities handling recyclate from Welsh local authorities?

Do you agree? (Please click only one of the boxes)	comments
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A MRF should be able to batch process loads from individual Local Authorities and give accurate reject rates.



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	Contamination issues are better dealt with at source using clear communication campaigns for residents.
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Consultation Question 9: Do you agree that certain separated wastes that are difficult to recycle should be sent for energy recovery rather than to landfill?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Incineration can cause harm to the environment (albeit within arbitrary limits) directly contradicting point 2 of the Specific Objectives of 3.3.4.4. Perhaps the Specific Objectives should include some parameters.

Consultation question 10: Do you agree that it is undesirable for untreated food waste to be spread on land in Wales, even under a permit, but instead be treated by AD? If yes, should the Welsh Assembly Government introduce legislation to specifically prevent the landspreading of untreated food waste?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	However In-Vessel composting could also be considered due to lower costs.

Consultation Question 11: Do you agree that the proposed landfill limitation targets for industrial and commercial waste are appropriate? If no, what targets do you suggest should be set?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Consultation Question 12: Do you agree that the proposed energy from waste ceiling for industrial and commercial waste is appropriate?

Do you agree? (Please click	comments
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only one of the boxes)	
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	

Consultation Question 13: Do you agree that the suggested energy efficiency levels for EfW facilities in Wales are desirable and achievable? If no, please explain your reasons.

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	

Consultation Question 14: Do you consider that the Welsh Assembly Government should seek powers to set minimum energy efficiency levels for EfW plants operating in Wales.

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	

Consultation Question 15: Do you agree that the RWP spatial strategy should be reissued and rolled forward as part of TAN 21? If no, please explain your reasons?

Do you agree? (Please click only one of the boxes)	comments
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	

Consultation Question 16:

a) What planning challenges can be foreseen in making the transition between the current RWPs and the CIM Sector Plan?

No comment

b) What further guidance and information do you consider will be necessary?

No comment



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Consultation Question 17: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please raise them in your response.

The issue of treating wastes within Wales is arbitrary - it is often more economical and more sustainable to transport waste along the M4 corridor from South Wales to Bristol for example than to transport to North Wales.