



Local Authority Recycling Advisory Committee

Ms Elly Watson
Waste and Recycling Statistics
Defra
5/E14 Ashdown House
123 Victoria Street, London
SW1E 6DE

13th April 2006

Dear Elly

Consultation Response - Providing BVPIs through WDF

I am writing to present the LARAC response to the above Defra Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

I think the principle of collecting BVPI data through WDF is a great idea. However I think the way that it has been proposed is overly complicated.

BVPI82a (Table 1)

Why can't Q10, Q12, Q17 and Q18 be added up as they include rejected tonnages and are all from household sources, saving the need for all the other steps shown in table 1.

Discussion point 2: we use question 18 to record recycling collected through competitions we hold in schools, so some of it is household waste.

Discussion point 6: Yes they should, as we use Q18 for household waste collected through our schools competitions.

BVPI82b- same comments as for 82a

BVPI84a- ONS figures are always different to the details we have for our rounds. Why can't the mid-year figure from 2006 be used to calculate 2006-7 BVPIs?

BV86- ODPM mid year household figures- again very different to what we have.

BV91b- why would it be the sum of households recorded Q7 of WDF receiving a kerbside collection of "at least one recyclable"????



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Additional comments: Obviously need to build in something so authorities can have something for internal use.

Comments from a UA regarding EfW:

Q4 - this is reasonable in many cases, but not water-tight. Most (nearly all) CA sites are run by WDAs and UAs (not WCAs).

Q7 - our recycling/composting rejects are, wherever possible (the majority of tonnage) sent to EfW and not landfill, so the proposed simplification is not reasonable

Q8 - Q54 doesn't distinguish between HH & non-HH waste disposal to incineration, so there would need to be another question breaking this down.

Comments from a WDA:

It is still not clear on how they intend 3rd party recycling to be recorded as it doesn't fall under LATS regime but is included in Pis.

Que 3. The optional step is a valid incorporation as some WCA's do collect trade recyclables such as Blaby and this may expand with LATS as a driver.

Que 5. Yes, we do need Q11 open to WDAs so that we can record non-household recycling. We are very concerned as LCC operates Whetstone which has a large trade element of which recycling of this material occurs at present this is recorded in CA recycling and the trade as non household CA.

Also not all the non-household CA waste is inert waste.

Que 7 Not acceptable to assume all rejects are sent to landfill. An option could be put into should a WDA choose this but the system and so skip part of the return should have an option to send the items to other residual treatment options. It would be best to make it future proof now as rejects could feasibly from one treatment may potentially go to an incinerator.

Que 8 The ramifications of this need carefully considering. We could provide the information and if we did little recycling of trade the mass balance of the item sent to Landfill would be 68% compared with WCA waste, which may be 60% for example. This would have a knock on with LATS as the current system is based on quite broad assumptions. But work better if we treated rather than landfilled all trade which is a fairer way of things. I'd need to do a bit more work on this.



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Q11. Cost assumptions are OK and may result in a slight benefit to the WDA.

If you have any queries on this response or would like to discuss the matter further then please contact me on 01530 454 615 or email Nicole.Atkinson@nwleicestershire.gov.uk.

Yours faithfully,

Nicole Atkinson
LARAC Policy Team



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Consultation Response - TITLE