



Local Authority Recycling Advisory Committee

Consultation on the terms of reference for the 2005-6 review of the Renewables Obligation

Thank you for the opportunity to respond to the consultation paper on the DTI's proposals on the terms of reference to be adopted for the 2005-6 Review of the Renewables Obligation. The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities, including 380 in England, 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 Authorities.

LARAC has no objection in principle to energy produced from municipal waste or energy produced using Refuse Derived Fuel (RDF) being eligible for Renewables Obligation Certificates (ROCs). However we are concerned that decisions about which technologies are deemed to be eligible and which are not may be made on the basis of doctrine or political expediency and not on the basis of criteria that are based on objective scientific evidence about the environmental outcomes of different processes and the efficiency of conversion of renewable materials into energy.

LARAC believes that, in general, conventional recycling and compost making are the environmentally soundest methods of treating municipal waste that has to be disposed of. However, it also understands that there are a number of processes for dealing with residual waste, some well established and some in an early stage of technical and commercial development, that enable value to be recovered from residual waste in the form of energy with little overall adverse environmental effect. Where it can be demonstrated that the operation of these processes results in waste being diverted from landfill, and that they provide the efficient (compared with other thermal processes using renewable materials) conversion of waste materials into energy, all thermal conversion processes including the use of RDF should be considered as potentially eligible for the issue of ROCs and evaluated against objective, rational criteria.

This approach would have two further advantages. Firstly it could be used to promote the generation of Combined Heat and Power from wastes; and secondly it could be used as a means of further strengthening the Pollution Prevention & Control regime, by requiring stringent environmental standards to be achieved before ROCs may be issued.