



Local Authority Recycling Advisory Committee

17th March 2006

Dear Richard Carpenter

Source Segregation Regulations 1994

Thank you for the opportunity to respond to the above. 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 supports the segregation of waste at source, as it believes that this leads to a higher quality product. However LARAC recognises the need to achieve LATS targets and the difficulties facing Local Authorities who are making, or have already made, residual waste treatment procurement decisions.

LARAC recommends that a British Standard, based on the experience of PAS100, is drawn up, with input and output requirements deciding the type of land the final product may be used on. Low quality outputs should only be used on contaminated land, landfill restoration etc. Only the highest quality products should be used on agricultural land.

In the interim period, before a Standard is adopted, any existing MBT facilities should be allowed to operate to a draft standard.

LARAC does not believe that the standards required should be regulated by an exemption, but should be subject to full regulation. However products that reach the highest standard should not be classified as waste. Only low quality products, used on contaminated land, landfill restoration etc should be subject to licensing conditions.

LARAC makes the following comments on the specific questions asked as part of the consultation :

Q1. Should the source segregation requirements in paragraph 7A remain in place?

Yes, until such time as it is replaced by a suitable Standard.

Q2. Is it environmentally acceptable (in terms of the relevant objectives of Article 4 of the Waste Framework Directive) to treat agricultural land with non source segregated biodegradable outputs from MBT (or other similar processes)?

No, as the highest standards should require segregated collection .

Q3. Is it agriculturally acceptable to treat agricultural land with non source segregated biodegradable outputs from MBT (or other similar processes)?

No, as the highest standards should require segregated collection .



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Q4. Is it environmentally acceptable to treat any land type with non source segregated biodegradable outputs from MBT (or other similar processes)?

Yes, provided that the outputs meet the standard for that land type.

Q5. What are the potential human health impacts that need to be taken into account ?

LARAC is not qualified to make a comment on this question. However DEFRA should give serious consideration to public perception when deciding on its approach to regulation .

Yours sincerely

Mark Allen
LARAC Policy Team