



Local Authority Recycling Advisory Committee

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Consultation response on Criteria for waste PFI projects

Thank you for the opportunity to respond to the paper on criteria for waste PFI projects. 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 373 in England, whose waste management and recycling professional's 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 welcomes this re alignment of PFI criteria taking into account the recent release of PPS10 and the amendments to Waste Strategy 2000 and specifically responds to the consultation questionnaire as follows:

Question A: Comments on Criteria

Criteria 1

LARAC agrees with the need for a Municipal Waste Management Strategies to be in place as a precursor to a PFI scheme. But would like clarification how these criteria might be addressed where excellent authorities are concerned.

Criteria 2

In respect of this criteria LARAC agrees that PFI projects should reflect best practice and thereby as a minimum deliver local and national targets however in respect of delivery of higher performance the measures proposed are overly simplistic LARAC suggest that in line with the recent EU communication: A thematic Strategy on the prevention and recycling of waste PFI schemes should be required to look at the optimum environmental benefits for their waste thereby ensuring that processes that can deliver significant environmental benefits have preference to those that can manage high volumes but deliver little environmental benefit.



Local Authority Recycling Advisory Committee

Criteria 3

Similar to criteria 2 in that quality and quantity should be criteria of assessment not quantity alone.

Criteria 4

Agree that waste minimisation should be specifically identified and to this end would suggest that construction processes within the PFI scheme should follow the principals of sustainable procurement and design to minimise the initial environmental impact of what are usually large civil engineering project which have enormous environmental impacts.

Criteria 5

In advance of the European Commissions proposals to amend the Waste Framework Directive the PFI criteria should stipulate energy efficiency thresholds in relation to energy from waste solutions. In addition rather than refer to creating future barriers the criteria should introduce the concept of ongoing exploration of alternatives that may have greater environmental benefit and that are complimentary to the principal process.

Criteria 6

As is partially recognised in the consultation process this is a repeat of Criteria 1 and is overly prescriptive.

Criteria 7

LARAC has significant concerns as to the relationship between PFI and LATS income and in order to ensure that PFI schemes do represent value for money for UK PLC suggest that schemes cannot take into account any potential income from LATS income in the value for money assessment.

Criteria 8

LARAC welcomes the standardisation of contract form.

Criteria 9

Again LARAC would refer to the EU communication: A thematic Strategy on the prevention and recycling of waste in that just because a market exists this criteria does not address the complexity of environmental impact: the weight of waste treated could be high but the environmental benefits low. Therefore as LARAC agrees that viable markets are an essential element of any proposal the additional caveat to that the market exists should be that it provides measurable environmental benefit either directly or by resource replacement.



Local Authority Recycling Advisory Committee

Criteria 10

LARAC welcomes that essential proposal should have a market.

Criteria 11

LARAC welcomes the acknowledgment of the contribution that the community sector can make to waste management.

Criteria 12

LARAC welcomes the inclusion of non municipal wastes into the criteria but suggests that “Should consider” is amended to “shall consider”

Criteria 13

LARAC welcomes the recognition of the introduction of PPS10 and the need to mitigate planning risk.

Question B

LARAC suggest an additional criterion should be added in that having undertaken the VFM exercise as suggested under criteria 7 the project states how it will use LATS income (should it be realised) to further contribute to the national achievement of Landfill Directive Targets through collaboration with other obligated authorities.

Regards

Neil Ferris
Vice Chair
Policy Officer
On behalf of LARAC Policy Team