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**Submission to consultation on
Review of England's Waste Strategy**

May 2006

Question 1: Please state your views on the overall approach for the revised strategy set out in this document and any other points you wish to make. (You may like to respond to this question once you have considered the rest of the document and the other questions.)

While I broadly welcome the ideas in the Review, it is disappointing that the Government seems to be satisfied for waste generation to keep on growing so long as it is at a rate lower than GDP: a better objective would be to aim to reduce waste in absolute terms.

Question 2: What are your views on proposed national household recycling and composting targets and the level they should be set at?

I support national targets but 50% recycling and composting by 2020 is not sufficiently ambitious as a vision. In order to achieve a real 'step-change', such as 50% by 2010, a political framework that does more to force businesses and individuals themselves to take responsibility for the rubbish they produce.

I support the proposal from a group of NGOs¹ to give councils the powers to implement charging schemes to encourage waste prevention, reuse, recycling and composting. Charging householders for an excess amount of waste they put out for disposal has the potential to dramatically change the way individuals perceive their waste production and how they manage it. Variable charging schemes have had a massive impact in other European countries – such as Belgium - and, if implemented carefully, would represent an equitable way of charging people and businesses for their waste collection services, as opposed to a fixed fee or council tax charge.

In San Francisco, where current recycling and composting levels are 48% and the target for 2010 is 75% (see SFEnvironment.com) and in Belgium, waste collectors provide or sell special containers that are colour-coded for compostable waste, recyclable materials and for all other waste; there is no charge for collection of recyclable and compostable materials. San Francisco's composting service includes food composting, including non-vegetables, not just garden waste. Bags as opposed to bins would be a cheaper option for councils and more suited to densely populated cities where storage of wheeled bins is problematic. Belgium runs a scheme similar to San Francisco's but based on bags.

In my view, the Strategy Review has rightly identified kerbside collection as key to raising household recycling rates.

Question 3: What are your views on setting municipal waste total

¹ *NGOs joint position on waste strategy* (June 2005)

http://www.wen.org.uk/waste/Reports/NGO_statement_wastetoresources.pdf

recovery targets?

I do not support the setting of statutory targets local authorities: as elected and accountable bodies, local authorities should be free to set their own targets but they should be obliged to provide performance information in a standardised form that allows voters to compare their own local authority's performance with that of similar authorities.

I support the inclusion of information on energy recovery by local authorities (but see answer to Q26). San Francisco has a scheme for converting dog waste collected from bins in parks into biogas!

Question 6: What scope is there for extending the 'stewardship' or responsibility of producers and retailers for the impacts of the products they manufacture and sell, and which key products or sectors should be explored?

Manufacturers should be incentivised or steered by regulation to provide a recycling service to consumers; e.g., the Orange Recycle for mobile phone reuse– see http://www.orange.co.uk/about/community/environment_recycling.html

Waste prevention targets

Question 10: Should there be greater effort to encourage waste prevention and minimisation relative to recycling and, if so, how should this be done?

- Taxes on the use of 'virgin material'.
- Charges for plastic bags and packaging: there should be a tax imposed on plastic bags as in the highly successful scheme that was recently introduced in Ireland.

Incineration

Question 26: Do you have any comments on the proposal to encourage the diversion of wastes from landfill to Energy from Waste?

I agree that deriving energy from incinerated waste is preferable to landfill, however, I share the view² that Government needs to create a mechanism for ensuring that local authorities (or their contractors) do not simply collect waste in a way that is designed to provide feedstock (or fuel) for their incineration facilities.

In Birmingham there is no collection of plastics for recycling (other than as part of a very limited pilot³) - neither doorstep collection nor recycling station – and this is justified with the arguments that a) there is no plastics processor in Birmingham, and b) that plastics, along with household refuse, are used as fuel in Tyseley power station, `a 350,000 tonnes

² See *The Waste Paper* (April 2006) "Waste Strategy Review" pp10-11.

³ I have been pressing the Council on this issue since at least 2001

per year mass-burn energy from waste facility, under the City Council's contract with the power station⁴.

Many of my constituents are very frustrated with the lack of plastics recycling in Birmingham. In my view, this is because for those that are motivated to recycle, plastics are an important target of their efforts. Participation in plastics recycling helps to increase recycling volumes of other materials⁵.

A recent report to Birmingham City Council (BCC)⁶ noted that, while at present Tyseley Energy from Waste plant is not a limiting factor on the amount of waste that is recycled, it would be once recycling volumes exceeded 50%. The regional energy planning policy suggests using energy from waste when other options further up the waste hierarchy are not available or viable. The existence of an Energy from Waste plant may reduce a local authority's incentive either to set up a facility that caters for options further up the waste hierarchy or to create a demand for such a facility.

Given the greenhouse gas benefits – “those scenarios comprising elevated levels of both recycling and energy recovery show greater net greenhouse gas benefits”⁷ – I would like to see the landfill tax increased at a much faster rate to ensure we meet our EU Landfill Directive targets.

Question 28: Should landfill eventually be the home of last resort taking only non-biodegradable residues from waste treatment?

Yes.

⁴ Core standard letter from Jeremy shields, Waste Strategy and contracts Manager, Fleet and Waste Management, Birmingham (copy enclosed).

⁵ According to Recoup (www.recoup.org), including plastics in a kerbside collection scheme increases the volume of other materials collected by 10-30% in addition to the increase directly attributable to the plastic containers themselves

⁶ Birmingham City Council Overview & Scrutiny (10 January 2006) *Recycling: Looking to the Future*

⁷ *Impact of Energy from Waste and Recycling Policy on UK Greenhouse Gas Emissions* Defra Final Report January 2006, section 1 @ <http://www.defra.gov.uk/ENVIRONMENT/waste/strategy/pdf/ermreport.pdf>