



The Scottish Parliament

ENVIRONMENT AND RURAL DEVELOPMENT COMMITTEE

AGENDA

6th Meeting, 2003 (Session 2)

Wednesday 24 September 2003

The Committee will meet at 10.00 am in Committee Room 1.

1. **Subordinate legislation:** The Committee will consider the following negative instrument—

The Inshore Fishing (Prohibition of Fishing and Fishing Methods) (Scotland) Amendment Order 2003, (SSI 2003/404)

2. **Petitions:** The Committee will consider **PE 541** and **PE543** on landfill sites. The Committee will take evidence from—

Karen Whitefield MSP

Ann Coleman, Greengairs Environmental Forum

Dr James S Buchanan and Paul Dumble, Roslin, Bilston and Auchendinny Community Group

3. **National Waste Plan inquiry:** The Committee will take evidence from—

Con Kerwin, Chairman, and Martin King, Secretary, Scottish Environmental Services Association

Dr Colin Clark and John Harris, Chartered Institution of Wastes Management

Douglas Boyle, Composting Association Scotland

Duncan Simpson, Chair, Recycling Market Development (Remade) Scotland

Steve Creed, Director of Business Development and Procurement, Waste and Resources Action Programme (WRAP)

Liz Partington, Head of Recycling, Lothian and Edinburgh Environmental Partnership (LEEP)

Stephen Cooper, Head of Environmental Services, Lerwick Waste to Energy Plant

Susan Carstairs, Development Officer, Lochaber Environmental Group.

Tracey Hawe
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The following papers are attached:

<p><u>Agenda Item 1</u></p> <p>The Inshore Fishing (Prohibition of Fishing and Fishing Methods) (Scotland) Amendment Order 2003, (SSI 2003/404)</p>	ERD/S2/03/06/1a
<p><u>Agenda Item 2</u></p> <p>A paper from the Clerk is attached</p> <p>Copy of petition PE541</p> <p>Copy of petition PE543</p> <p>Submission from the Roslin, Bilston and Auchendinny Community Group</p> <p>Submission from Karen Whitefield MSP</p>	<p>ERD/S2/03/06/2a</p> <p>ERD/S2/03/06/2b</p> <p>ERD/S2/03/06/2c</p> <p>ERD/S2/03/06/2d</p> <p>ERD/S2/03/06/2e</p>
<p><u>Agenda Item 3</u></p> <p>Note from the Clerk (<i>for members only</i>)</p> <p>Submission from Scottish Environmental Services Association</p> <p>Submission from Chartered Institution of Wastes Management</p> <p>Submission from WRAP</p> <p>Submission from Lerwick Waste to Energy Plant</p> <p>Submission from Lochaber Environmental Group</p>	<p>ERD/S2/03/06/3a</p> <p>ERD/S2/03/06/3b</p> <p>ERD/S2/03/06/3c</p> <p>ERD/S2/03/06/3d</p> <p>ERD/S2/03/06/3e</p> <p>ERD/S2/03/06/3f</p>

Agenda item 2

**Environment and Rural
Development Committee**

24th September 2003

ERD/S2/03/06/2a

ENVIRONMENT AND RURAL DEVELOPMENT COMMITTEE

PETITIONS PE541 AND PE543

PE541 by Dr James S. Buchanan on behalf of The Roslin Community Action Group, and **PE543** by Karen Whitefield MSP both call for the Scottish Parliament to investigate (a) the impact of landfill sites on the health and environment of surrounding communities, (b) the rationale behind the proposed expansion of landfill sites, given the new EU landfill directives requirements, (c) the need to encourage more sustainable solutions to waste management and (d) better mechanisms in the planning process whereby all consultees become more proactive in encouraging developers to incorporate features reinforcing sustainable development policy objectives.

PE541 relates to a proposed expansion of Oatslie landfill site at Roslin (permission for which has now been refused). PE543 relates to landfill sites at Greengairs.

Progress of the Petitions

1. On 24 September 2002 the Public Petitions Committee (PPC) agreed to link PE541 and PE543 together and write to SEPA and the Scottish Executive regarding the issues raised by the petitions.
2. On 17 December 2002 the PPC considered responses from SEPA and the Executive. The PPC agreed to write to the Chartered Institution of Wastes Management (CIWM), the Institute of Environmental Management and Assessment (IEMA) and Scottish Environment Link on the adequacy of current arrangements.
3. On 25 March 2003 the PPC considered responses from CIWM and IEMA and Friends of the Earth Scotland (which responded on behalf of SE Link). The Committee agreed to refer petitions PE541 and PE543 to the successor committee to the Transport and Environment Committee for further consideration in the new session. (At this point the Transport and Environment Committee also had a remit to consider to consider planning matters, which, in Session 2, rests with the Communities Committee.)
4. The PPC referred the petitions to the Environment and Rural Development Committee in June 2003. On 3 September 2003 this Committee agreed to consider the petitions as part of the inquiry into the National Waste Plan, and agreed to take evidence from the petitioners at this meeting.

Issues raised by the petitions

Issues within the Remit of this Committee

Waste Management Issues

5. The petitions call on the Parliament to investigate..."(b) the rationale behind the proposed expansion of landfill sites, given the new EU landfill directives requirements, [and] (c) the need to encourage more sustainable solutions to waste management." Both of these issues are clearly within the remit of this Committee, and are highly relevant to the current inquiry.

Noxious odours

6. The petitioners also express concern at the effects of noxious odours emanating from landfill sites. Members will recall that, in its consideration of petition PE 517 on waste water treatment plants on 10 September 2003, the Environment and Rural Development Committee concluded that the regulation of odour nuisance in general is an issue that requires further examination.
7. The Committee agreed to write to the Minister for Environment and Rural Development requesting an update on how the Executive plans to take forward issues relating to odour control. The Committee has requested a response from the Executive by the end of October 2003. The Committee is therefore able to take these concerns of the petitioners into account as part of its work on PE 517.

Issues outwith the Remit of this Committee

8. The petitions also raise issues that cross into the remit of other Committees of this Parliament, eg issues relating to the planning process and the health impacts of landfill sites on local residents.

The Planning Process

9. The petitions request that the Parliament investigate ..." (d) better mechanisms in the planning process whereby all consultees become more proactive in encouraging developers to incorporate features reinforcing sustainable development policy objectives. "
10. The PPC referred the petitions to the Environment and Rural Development Committee in June 2003 with a strong recommendation that this Committee examines the role of the Scottish Environment Protection Agency in the planning process, and in particular, the Environmental Impact Assessment process.
11. Members may wish to note that the Transport and the Environment Committee considered SEPA's role in this process as part of its work on petition PE 377 on polluting activities in built-up areas. The Committee raised its concerns regarding this process with the Minister for Environment and Rural Development.

12. The response from the Minister noted that—

The Scottish Executive, in consultation with SEPA and other interested parties, will undertake a study to establish the scope for improving interaction between the statutory land use planning system and environment protection consenting regime. This will include considering the respective powers of the Executive, planning authorities and SEPA to assess the way in which they are working together.

13. At its meeting on 10 September 2003 the Environment and Rural Development Committee decided that follow-up work on this issue was outwith its remit as planning issues now fall within the remit of the Communities Committee.

Health concerns

14. The petitions further request that the Parliament investigates “(a) the impact of landfill sites on the health and environment of surrounding communities”. Members may consider that they are unable to take this request forward, as the concerns relating to the health of people living in communities close to landfill sites clearly fall within the remit of the Health Committee.

Options for action

15. The Committee is invited to consider the options for action outlined below or take any other competent action that it deems appropriate.

16. The Committee has previously agreed to take the issues raised by the petitioners which relate to the National Waste Plan into account as part of its current inquiry. These issues can be put to other witnesses throughout the inquiry (including the Minister for Environment and Rural Development) and can be addressed in the inquiry report. The Committee will also be taking forward issues relating to the regulation of noxious odours in its work on PE 517. On this basis the Committee may wish to conclude its consideration of the petitions.

17. In relation to issues outwith the scope of its remit, the Committee may also wish to consider writing to the PPC inviting it to consider whether it wishes to re-refer the petitions to the Communities Committee and the Health Committee in light of the issues raised by the petitions which relate to their remits.

Submission by the Roslin, Bilston and Auchendinny Community Group

**Presented by Dr Jim Buchanan FFICS, supported by Paul Dumble MSc
MCIWM.**

We believe that the recent impact of the protests by Scottish community groups against waste development planning applications has consequences for all other waste developments in Scotland.

The focus of the Roslin, Bilston and Auchendinny Communities Group in their successful campaign against an application for a landfill extension at the Oatslie Site in Midlothian was on the failure of the planning application to address significant areas of waste and planning policy. The campaign has led to the subsequent withdrawal of the planning applications by the waste operator in November 2002.

This paper will provide the convenor and assembled members with some of the principal issues that arose in successful campaign that was executed between July 2002 and November 2002 by the community group.

We ask you to consider our experiences and this may help you understand from our perspective some of the problems that we believe will afflict the effective implementation of the National Waste Plan. We feel these issues are important as they are likely to be costing the waste sector £10's of millions in increased costs as implementation of their plans are often deferred. Further with many of the applications being put through to the Scottish Executive it is the politicians that take the rap for the many local planning decisions.

Background

Throughout Scotland it must be fairly obvious to the Scottish Executive that there is a great deal of public hostility to contentious developments that include any type of waste facility. The communities and groups who oppose these developments are often classified and stereotyped by those who least understand them with the term NIMBY (Not in my back yard). The objections of these "protest" groups are often trivialised by other key stakeholders and the developers. "It is now certain that contentious developments that avoid key stakeholders (who may be inside or outside the planning process) are almost certain to fail" (Not our words but those of a public official commenting about recent developments in the renewable energy sector).

We would argue that in any development affecting a local community, the local community should be a recognised stakeholder in the planning process.

What brought our community into the debate was the ill considered planning application submitted by a landfill operator. We would like to share with the honourable members of the Committee present, some of our experiences in

the hope that we all learn and progress. Let us tell you a little about the planning process that we became involved with.

In July 2002 we learned of an application for planning permission to extend the local landfill site at Oatslie. Within a few days a small action group had been formed and a public meeting organised. There was general response of surprise and anger throughout the local villages. Two of the main reasons for the anger are highlighted below.

- The timing of submission the landfill extension planning application was perceived to coincide with the key public officials, politicians and local authority members being on annual leave (c.f. Burying bad news controversies with the DTI).
- The health issue – there was a strong perception that the landfill would increase the risk particularly to the weaker members of the community (pregnant mothers and their babies, the young, the old and the sick). This was particularly reinforced by incidents including flies and vermin and sickly odours from the site resulting from poor operating practices over the years.

It was the second of these issues on health that bound the community group and maintained the purpose and moment of our community group throughout its campaign. **We believe that the Committee should look at the factors underpinning these fears and make a health impact assessment as a compulsory element of the Environmental impact statement submitted by the developer.**

The mood of the affected community of around 5000 was such that it was hard to find anyone who wanted the landfill development at all (many wanted the current site to be closed down). Many of the villagers at the start of the campaign believed that they were fighting a lost cause. Even with this poor prognosis, the villagers in their hundreds organised marches, wrote to politicians and attended public meetings and of course presented a petition to the Scottish Parliament.

We believe we won our campaign by concentrating on the planning issues and what we came to understand as significant deficiencies in the way the planning application supported the then emerging National and Local Waste Plans.

Let us address the first planning issue. For many in the community group the realisation that they were effectively “outside the planning process” meant that any intervention could only be through individuals within the community writing to the Local Planning Officer at the Local Authority. In this aspect the system automatically creates “objectors” in its design. **We would argue that the community group in the vicinity of a contentious development should be considered inclusively within the planning regime.**

As our campaign developed the Roslin and Bilston Community Council engaged with our group and one of its officers facilitated meetings for the community action group with other stakeholders (The landfiller, the local

council and SEPA). It is important that the community has effective communication to the planning authority and other stakeholders through its elected representatives. One voice it needs to be able to express its will through local elected representatives. **We ask that Members of the Scottish Parliament Environment and Rural Development Committee look into developing a official consultee role that utilises the Parish and Community Council members acting as facilitators or conduits for the issues raised by community groups.**

In the course of public meetings that were held it was difficult to engage constructively with the developer or for that matter with other stakeholders. We feel that therefore there is a role for the elected Parish and Community Councils to seek answers to key issues or concessions from the developer.

Conclusions or recommendations from such discussions could be used to support the planning application. For example the community may seek assurances from the operator that more local waste is recycled and that appropriate facilities at agreed locations are provided for collection and storage a number of waste types – e.g. glass bottles, paper, aluminium, metal scrap, wood wastes, green wastes and textiles. Such local co-operation could be used by the landfiller to argue and support the case that capacity on the site could be utilised for longer periods. In effect the planning application becomes much stronger supporting the waste recycling targets set within the national and local waste plans. Other areas of discussion could include control of odours, treatment of wastes, limiting certain types of waste being taken at the site, operational hours, site deliveries, public scrutiny of the site.

We ask that the Scottish Parliament Environment and Rural Development Committee introduce a requirement on developers to consult with community groups to ascertain any impacts on the affected community. Such report would provide rationale to address issues raised (c.f. Environmental Impact Assessment) and any agreed actions that could be incorporated into the planning application.

Other Issues

Let us briefly now look at some of the other issues identified in our campaign.

Our community will support any scheme that will increase waste recycling and recovery rates or implement sustainable practices. It is unfortunate that neither the local authority (Midlothian Council) nor the landfiller has taken the opportunity to approach us to engage us on any of these issues since the end of our campaign.

We would have liked to have had **an assessment by the applicant that demonstrated how the development would contribute to the National Waste Strategy and how it integrates with other waste management activities** and initiatives. We recommend to the committee that such an assessment be a condition within the planning system.

SEPA

We were disappointed with the reaction of SEPA to our campaign. SEPA seem only interested in prosecuting their waste licensing role and appear to have little interest in addressing key policy issues raised at the planning stage. **We recommend to the committee that SEPA become more proactive in maintaining the policy frameworks that underpin the national and local plans.** Development Plans that fail basic criteria (e.g. target achievement, contributions to recovery targets, integrating with other waste management systems etc) should require the applicant to reconsider and amend their application.

Education, education, education.

The academics talk about education and there is little evidence that such is reaching our communities in our experience. The Scottish Executive adverts have been useful but do not yet relate to more sustainable practices and activities on the ground. From our community perspective **we feel that we are still waiting to be engaged in this process.** There must be many other communities in Scotland where this is the situation.

We would have liked to have understood how the development could involve our community in increasing recycling and recovery of wastes.

The developer (in this case) was acting in (perceived) isolation from the collection systems. The Oatslie application simply closed down one civic amenity site to replace it with another (no figures were presented by the developer to show the increase or decrease in recycling rates).

Funding - The "poor low value waste sector

Our concept of waste of having little value creates a "poor" industry that relies on state handouts for its survival. This is perhaps an issue for the think tanks but shows a focus within the waste sector that encourages poor financial skills, poor risk management skills and lack of innovative thinking in the waste/ recovery sector. We feel developers are unimaginative in their applications and seek to minimise investment costs. **We would like to see this "hand to mouth" waste sector culture replaced with modern resource management culture that is confident to invest to gain market advantage.**

Technology

As a community, we understand that there are technologies and practices that could be brought to bear on waste recovery and treatment issues that would begin to address many of our concerns. **We ask the Committee to investigate and support sources of technologies that will reduce environmental impacts of the wastes.**

Agenda item 2

**Environment and Rural
Development Committee**

24th September 2003

ERD/S2/03/06/2e

19 September 2003

Sarah Boyack MSP
Convenor
Environment and Rural Affairs Committee
The Scottish Parliament
George IV Bridge
Edinburgh
EH99 1SP

Dear Sarah

I would be grateful if you would accept the following as a written submission to the committee.

I would like to place on the record my concern regarding the impact that landfill operations are having on numerous communities across Scotland. I know, from my experience of dealing with and working alongside the people of Greengairs, the devastating impact that large landfills can have when they are adjacent to communities.

I have received many complaints from the people of Greengairs about the continual disruption that the nearby landfill is having on their community. These include: frequent emissions of highly noxious odours; heavy vehicles passing through a relatively small village, causing damage to roads and often shedding waste and; noise pollution. My constituents, like others across the country, are also very concerned about the possible impact that the landfill will have on the health and wellbeing of villagers.

I share concerns, such as those of villagers in Greengairs, about the expansion of landfill sites around communities. It can often seem that, once initial opencast and landfill developments have proceeded, communities such as Greengairs are then targeted as 'proven viable sites'. For the people living around landfills, this becomes a vicious circle, with one landfill leading to another, until, as is the case in Greengairs, the community is almost entirely surrounded by landfills.

I believe that, to properly address the concerns of those who live near landfill sites or proposed landfill sites, the planning process must become more responsive to the views of local people. It is my belief that, all too frequently, developers submit planning applications which are far less substantial than their real requirements. I believe that they do this in the expectation that additional planning consent will be easier to obtain in the future once the initial development has commenced. The planning process must ensure that, from the outset, communities understand the true intentions of those seeking to develop land. The process must ensure that any guarantees given by developers regarding such things as the scale, duration and

type of landfill being proposed, are monitored and developers properly held to account for breaches.

Finally, I welcome the Scottish Executive's commitment to developing greater use of sustainable and more environmentally friendly waste solutions. I would urge the Committee, the Parliament and the Scottish Executive to ensure that this commitment becomes a reality sooner rather than later.

Yours sincerely

Karen Whitefield MSP
Airdrie & Shotts Constituency

SUBMISSION FROM SESA

What progress is being made in meeting the targets set out in the Plan?

SESA is the trade association for Scotland's waste management industry, a sector which contributes 0.5% to Scotland's GDP. SESA's Members want to be enabled to deliver Scotland's contribution to the UK's compliance with the Landfill Directive and other relevant EU laws, with appropriate pre-treatment of hazardous wastes and by returning to the productive economy more of the energy and materials contained in waste.

SESA supports the general thrust of the Scottish Waste Plan towards achieving much higher levels of resource efficiency. SESA supports also the Waste Strategy Area Groups. However, we do not believe that the policies and proposals in the Scottish Waste Plan go far enough to meet recycling/recovery targets required by EU law.

SESA appreciates that the Executive does not have direct control over the level of Landfill Tax. However, none of the three key drivers under the direct control of the Executive—regulation, planning and funding of household waste—yet points to delivering our contribution on a timely basis to the UK's compliance with the Landfill Directive.

Funding

Experience elsewhere in the European Union demonstrates that recovering more of the value contained in the waste stream is more expensive than landfill. According to page 34 of the National Waste Plan, currently an average household in Scotland pays £70 for municipal waste management services with value recovered from only 9% of the waste stream. In the Netherlands, the average household pays £125 per annum for municipal waste management services with value recovered from 88% of the waste stream.

ESA, the trade association for the UK's waste management industry, has estimated that the private sector can, at current levels of generation of municipal waste, deliver the UK's compliance with the obligations of the Landfill Directive relating to municipal waste for about £1 per person per week. We have no reason to believe that these figures will differ for Scotland. We do not, however, understand the assumption made by the National Waste Plan (page 34) that treatment costs will be less in 2020 than in 2010 and would counsel against planning public policy on this basis. Delivering greater resource efficiency is a long-term commitment and will require continuing levels of investment in the future.

Obviously, investment in infrastructure can be provided only on the basis of clear financial commitments: references to European structural funds (page 68) may or may not prove to be soundly based, but mere aspiration cannot deliver infrastructure.

SESA believes that funding arrangements for the management of municipal waste will need to be modernised to ensure that the best environmental outcome is delivered in the most competitive way. We advocate the introduction of direct charging for the delivery of municipal waste management services to increase funding in accordance with the polluter pays principle and without cost to the public purse.

It is possible to construct direct charging models in a manner which is not regressive and there is a clear distinction between **direct charging**, a flat fee paid to SESA's Members (perhaps collected by Local Authorities) and **variable charging** which requires householders to pay more if they generate more waste. Variable charging may be a desirable long-term option but in the short term, unlike direct charging, it creates incentives to evade payment (for example, through fly-tipping) and it is more complex to construct models of variable charging which are not regressive.

SESA is concerned that such public funding as is being made available might not be securing the best possible outcomes. For example, the Strategic Waste Fund may need to be restructured because funding has not been used to support the entire recycling chain. For example, a significant proportion of the funding spent on recycling has been directed towards establishing co-mingled recycling schemes where specific recyclable materials are collected from the household in one receptacle. This material then needs to be separated further by a material recovery facility (MRF) into individual component waste streams such as paper, glass and cans. However, the development of new MRF capacity is not keeping pace with the development of new co-mingled recycling schemes. This may mean that, over the next few years, there could be an oversupply of partially sorted recyclable materials with no available exit routes and which would not count as recycled under the EU's Waste Statistics Regulation.

Planning

We will need significant numbers of new facilities to deliver the objectives of the National Waste Plan. However the planning process acts more as a barrier to than a facilitator of sustainable waste management. Decisions are often subject to delay and the process remains unpredictable.

The Plan contains no new proposals to improve the speed and certainty of the planning process. While SESA of course fully accepts that planning properly asks elected political leaders to balance economic development with environmental and social needs, if the Executive is committed to meeting its own targets, it does need to ensure that the planning process is consistent with this objective.

In the Netherlands, for example, the authorities identify and categorise available land into specific bands of industrial use. These bands would correspond to a particular industrial activity and, following consultation and rigorous assessment, would be included in the Structure and Waste Local Plan. The development control process would be much more streamlined for applications in these areas. In addition, Waste Strategy Areas (WSAs) should be made statutory consultees.

Regulation

The primary driver for the waste management industry is getting the regulation right so that there is confidence that waste will flow to new infrastructure. The National Waste Plan improves certainty but not to the extent that is required. For example, there is not much comfort on how the Executive will improve its performance in implementing EU Legislation and avoid, as happened with the Landfill Regulations, transposing EU law into national law two years after the deadline. Such delays only serve the purpose of shortening the timescale for delivery available to the waste management industry.

Nine months after waste acceptance criteria (WAC) appeared in the EU's Official Journal, the Executive has not issued its proposals for transposing WAC into national law. WAC are essential drivers to investment because they define the standards to which hazardous waste must be treated before it can be landfilled and therefore determine the range of new treatment infrastructure which is appropriate. Co-disposal of hazardous waste in landfill will be banned from 16 July 2004 and we welcome SEPA's intention to apply WAC in time for this deadline.

Does the National Waste Plan provide for suitable methods of reaching the key targets for managing waste?

SESA's Members want to be enabled to transform recycling and recovery levels. As the Plan recognises, a balanced approach is required that reflects the optimum environmental solution. Those countries that achieve the highest recycling rates in the EU also extract

energy from at least more of the municipal waste stream than is the case in Scotland. For example, Switzerland recycles 42% of the municipal waste stream and recovers energy from 45% of the municipal waste stream.

Page 28 of the National Waste Plan states “*recycling is calculated as the total quantity of segregated materials abstracted from the waste stream for reprocessing into useful secondary materials*”. While we warmly welcome the output based aspect of this definition, the EU Waste Statistics Regulation defines recycling more tightly as “*the reprocessing in a production process of the waste materials for the original purpose or for other purposes including organic recycling but excluding energy recovery*”. The Executive is required precisely to comply with this more prescriptive definition which clearly includes **return** to the productive economy of the materials as well as processes involving separation, collection and processing.

Are all stakeholders able to work effectively together, particularly where the Waste Strategy Area covers more than one local authority boundary? Is the Waste Strategy Area approach working appropriately? Is the Best Practicable Environmental Option being achieved appropriately in practice, with particular reference to the differences between urban and rural areas?

SESA supports the approach of developing the National Waste Plan. We welcome also the proposal to give statutory force to targets in the Area Waste Plan. However, ultimately the success of this approach will be measured by the number of new recycling/recovery facilities that are delivered on an economically and environmentally justifiable basis.

The National Waste Plan is only eight months old: it is too early to judge whether BPEO is being achieved as new infrastructure has yet to be built.

SESA agrees with the Executive that there is much more scope for local authorities to work together more effectively. It is a matter for elected politicians to determine how best this can be achieved.

Can adequate markets for waste be developed in order to reduce landfill, and could market development undermine longer term efforts to minimise waste production?

Over the longer term, the recently published Communication on a Thematic Strategy on the Prevention and Recycling of Waste indicates that the EU's efforts are aimed at reducing the toxicity and rate of growth of waste arising.

Growth in waste should be reduced not by destroying people's aspirations to consume, but by providing products that are less demanding of the world's resources. The Executive should aim to enable market based economic activity to be as environmentally benign as practicable. Over the longer term, the EU's plans for resource management and integrated product policy will reduce long-term levels of waste generated.

It is certainly the case that more recycled materials would benefit from more reliable market outlets and SESA welcomed WRAP's original remit to help in this regard. We would not wish to see WRAP's focus lost as a result of expansion in its responsibilities. The Executive could help to strengthen markets in recyclates by ensuring more procurement by the public sector of secondary materials and products.

SESA also supports other initiatives-for example ReMaDe-which encourage product and market development for recycled materials.

We see no realistic prospect of improved markets for recyclates undermining longer-term efforts to minimise waste production.

What initiatives are developing to improve management of non-municipal waste?

Waste flows to the cheapest lawful waste management option which is not typically the Best Practicable Environmental Option (BPEO). SESA therefore supports the production of national technical guidance notes for business wastes (as outlined in page 62 of the Plan), and we are happy to participate.

Guidance-as opposed to regulation-is unlikely to result in more businesses sending their waste to the BPEO unless there is a clear economic or regulatory case. Where there is a clear environmental and economic justification, SESA advocates the introduction of economic instruments such as trading systems or mandatory producer responsibility agreements to manage business waste more sustainably. As markets work better where there is sufficient liquidity, we believe such trading systems should, as a minimum, apply across the UK.

What contribution are local and community groups making to meeting the new targets and wider sustainable development objectives?

Community groups play a useful role in increasing awareness of waste management and recycling issues. Continuing encouragement, based on simple and consistent information, is required to ensure high quality collected recyclables. Contamination of recyclables results in huge additional costs and the recyclable material being sent to landfill. However, the community sector cannot deliver the National Waste Plan: could farmers' markets replace the major supermarkets?

By far the best prospect for delivering the National Waste Plan is new infrastructure managed by responsible waste management companies. SESA's Members also have largely unionised workforces, provide pensions and have externally verifiable environmental audit and health and safety systems. If the Executive wants to achieve an optimal balance of economic, environmental and social outcomes then, as a minimum, it must secure a level playing field for delivering waste management services.

Chartered Institution of Wastes Management Written Submission

The Chartered Institution of Wastes Management (CIWM), is the professional body which represents over 5,500 waste management professionals - predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience.

Its Objectives are:

- Advancing the scientific, technical and practical aspects of wastes management for the safeguarding of the environment
- Promoting education, training, research and the dissemination of knowledge in all matters of wastes management
- Striving to achieve and maintain the highest standards of practice, competence and conduct by all its members.

The Scottish Centre Council

The Scottish Centre Council of CIWM is elected by the membership. The current members, representing all areas of the industry, are as follows:

Chairman Mr A K G Lamont, A Lamont Associates
Hon Centre Secretary Dr C F Clark, The Highland Council
Miss K Anderson, West Lothian Council
Professor J I Baird, Caledonian Shanks Centre for Waste Management
Mr J F Crawford, East Ayrshire Council
Mr J I Ferguson, SEPA
Mr J K Harris, Snowie Limited
Mr K R Morin, Alba Resource Recovery Limited
Mr G M Niblock, Aberdeenshire Council

1.0 Introduction

This submission answers the specific questions posed by the Committee in its communiqué of the 3rd September 2003.

2.0 Specific Questions

Does the National Waste Plan provide for suitable methods of reaching the key targets for managing waste?

It could be argued that the plan is a framework rather than a method statement for achieving targets. However if the various legislative imperatives such as the WET Bill when enacted, and ReMaDE programmes are regarded as methods then in part, yes.

However further work is urgently required on building the infrastructure which will actually manage the waste and produce recyclate and compost, the development of stable markets, preferably, in and across Scotland, and on behavioural change of the public, commerce and industry.

Efforts should also be directed to waste minimisation rather than the current pre-occupation with recycling, which stands an equal distance from the top and bottom of the waste hierarchy.

What progress is being made in meeting the targets set out in the Plan?

Given the Plan was launched in the spring, it's too early to see significant movement on the targets.

Progress may however be slow given the length of time involved in obtaining funding, planning consents, waste permits and where appropriate contracts between the public and private sectors.

A major stumbling block appears to be the planning system. Unless some significant guidance or direction is forthcoming from the Scottish Executive, the current planning system is unlikely to deliver the necessary infrastructure in time, if at all.

Local authority procurement, particularly PFI/PPP, could be another major hurdle. PPP is protracted and expensive and also restrictive in that only a few providers are likely to be able to carry the risk and costs.

Do funding methods provide the right form of targeted support and incentives?

Whilst welcome the SWF is essentially a challenge fund. This means that those authorities that bid first received funding – relatively quickly and without much in the way of interrogation.

The fund as it is presently administered (some funding for perhaps all authorities) is unlikely to achieve the desired long term results.

Whilst collection systems are ultimately vital they are secondary to the development of infrastructure. However at present there seems to be a preference for investment in the former rather than the latter.

Is the level and method of funding through the Strategic Waste Fund appropriate to ensure that the Plan is achieved?

No. It is debatable whether there are sufficient funds to meet the short term targets. Of more concern is the longer term view. There would appear to be little consideration given to the ever steepening hill that Scotland will face beyond 2010.

Again it is infrastructure development that needs to be funded for the long term.

Is the Waste Strategy Area approach working appropriately?

It has delivered, at last, a strategy for wastes management and moved the subject up the political agenda. However any initiative to fulfil the UK's requirements under the Framework Directive would have had a similar effect.

Clearer guidance on the roles, responsibilities and rights of each of the membership should have been given at the outset. It is hoped that guidance will now be developed to ensure that groups and group members are clear on their respective roles.

Nevertheless it has at least required the various parties to sit around the same table to discuss matters of mutual interest.

The relationship between AWP's and planning is not well understood and the approach may engender conflict between the two processes.

Can adequate markets for waste be developed in order to reduce landfill, and could market development undermine longer term efforts to minimise waste production?

Recyclate is and will continue to be traded as a world commodity. Landfill tax is already having some impact on the market. When it reaches a level that simply makes recycling economically more attractive then the industry is liable to move in that direction.

Issues which will also affect market development include the quality and surety of supply of materials.

In any economic modelling or forecasting it would be prudent and beneficial to collectors if it was assumed that recyclate will in general have zero or near zero value.

At the parochial level there is unlikely to be a paper mill, de-tinning plant or aluminium re-processor sited in Scotland. A consensus on how Scotland regards "proximity" and "self-sufficiency" is urgently required. Scotland should strive to close the loop internally in as many component parts of the waste stream as possible.

The second part of the question could be incongruous but depends on the definition applied to "market development" and "waste production". Recyclate is already waste. Waste production *per se* can only be reduced or minimised by front of pipe solutions, namely at the consumer end of the chain of utility.

Where the mass of inputs to the chain of utility continues to increase, some of the increase can be offset by the use of recyclate. However the mass of waste produced over an indefinite period of time will continue to increase.

In essence waste production should be tackled by fiscal and other statutory mechanisms on the production, retail and consumer side of the economy.

Is the Best Practicable Environmental Option being achieved appropriately in practice, with particular reference to the differences between urban and rural areas?

Too early to say, except in those areas where much of the BPEO was simply an iteration of existing facilities.

It should be remembered that the BPEO is a moving feast rather than fixed for all time. Time will tell whether in the end (due to financial pressures) it becomes simply the most economically advantageous solution.

In rural areas there is a need for the provision of significant infrastructure and support for existing facilities including landfill. If not forthcoming then rural communities are unlikely to benefit from the wider social benefits detailed in the BPEO.

What initiatives are developing to improve management of non-municipal waste?

SEPA and other stakeholders are starting the process in respect of non-MSW streams and is due to report around 2006. However, due to the large quantities and variable nature of these streams, the task should not be underestimated.

The timescales are unfortunate as at least some synergies could be had with the infrastructure which will be put in place for MSW.

Are all stakeholders able to work effectively together, particularly where the Waste Strategy Area covers more than one local authority boundary?

LAs have and continue to work together. Equally the LA sector has and continues to engage the private sector for the provision of waste services. This will continue.

SEPA is no more aware of the issues relating to the waste business.

The enterprise companies appear to have less understanding of the magnitude of the strategy and of the potential benefits to business.

The community/not for profit sector has not been fully engaged across Scotland with the process.

What contribution are local and community groups making to meeting the new targets and wider sustainable development objectives?

Local community groups have a role to play, although the impact is likely to be small and, by definition, localised.

They may be most usefully engaged in raising awareness and assisting in behavioural change. But the Scottish Executive must accept that the costs and measuring of benefits which may accrue from the work of the sector may be high and difficult to objectively measure.

However these groups can be the vehicle for delivering niche benefits such as employment opportunities for a wide range of excluded sections of the community. Again, Scotland must take a view on whether this is a priority and an integral part of the NWP.

Are the targets and priority approaches in the Plan appropriate, and do they adequately reflect best practice as well as existing legal obligations?

Targets were largely derived by comparative assessment of delivery mechanisms (except those required by the Landfill Directive and latterly by the birth of the 25% national target – which appeared largely arbitrary) derived by part quantitative/qualitative approach. However it must be recalled that it is a dynamic process and changes to the targets (if down) should not be viewed as failure.

The country needs to focus more the arrest of waste growth, and changes to patterns of consumption if the larger questions relating to sustainability are to be addressed.

As stated above the plan should be regarded as work in progress – best practice and legal obligations will change and the plan will need to respond. However it is not clear how large infrastructure projects requiring long return periods will be able to respond in a similar manner.

Does the Plan take account of likely future EU obligations, and how will it leave Scotland placed to meet the challenge of these new developments?

In general the answer is no. Scotland does not have the infrastructure to deal with existing obligation far less a future and uncertain situation.

3.0 General Comments

1. The Communiqué of the 3rd September 2003 contains a quote from the Committee Convenor, Sarah Boyack, which states “Scotland has an extremely poor record on waste management”.

Scotland and the UK is served by an extremely efficient and effective wastes management industry – including both the public and private sectors. For example local authority waste collection is cheap and since th early 90's has collected twice the quantity of waste with half the resource. Disposal has also been relatively cheap and has operated without significant criticism.

What Scotland does not have, is a good record on recycling and recovery. The reasons for this are myriad but a significant factor has been that it has simply not featured on any political agenda, until very recently.

2. The policy environment in which the targets are based requires to be developed. Certainty is required in specific areas. This is particularly true when considering bio-waste. Bio-stabilised material of whatever quality should not be regarded as waste if it poses no significant environmental risk and is “fit for purpose”. Rigid adherence to horticultural composting standards will be a self defeating stance for Scotland.

3. Policy decisions in terms of the application of fiscal tools, and other statutory instruments, to create front of pipe solutions to waste growth, composition, and re-use are urgently required.

4. Finally waste professionals need simply to be given the necessary funds, and political backing to deliver the plan.

Dr Colin Clark
Honorary Scottish Centre Secretary
Chartered Institution of Wastes Management

19th September 2003

SUBMISSION FROM WASTE AND RESOURCES ACTION PROGRAMME (WRAP)

1. What is WRAP?

The Waste and Resources Action Programme (WRAP) is a UK wide organisation, funded by Central Government, the Scottish Executive and the other devolved Administrations. WRAP's primary mission is to create stable and efficient markets for recycled materials and products by working with industry, the public sector and the wider community to bring about positive change in the management of waste in the UK. The clear remit given to WRAP as its first priority was to act to support the improvement in the UK's recycling performance through a programme of recycling market development.

2. The challenge of managing waste more sustainably

All parts of the United Kingdom face a tremendous challenge in seeking to manage waste more sustainably. While the EU Landfill Directive provides the main focus for activity in managing municipal waste, requiring large reductions in the tonnage of biodegradable municipal waste going to landfill by 2020, many other European-led Directives (e.g. on Packaging, End of Life Vehicles and Waste and Electronic Equipment) are rapidly raising the profile and impact of wastes management as an area of public policy.

3. The need for recycling market development

Historically there have been a range of barriers on both the supply and demand sides of the market economy which have prevented significant progress in increased recycling in the UK. The main barriers include low market confidence in recycled materials and products, low critical mass of demand for products, unfavourable recycling economics (materials are used in low value applications or have high collection and reprocessing costs) and there are insufficient high-quality materials being delivered to reprocessors.

4. Response to Specific Questions raised by the Committee

Does the National Waste Plan provide for suitable methods of reaching the key targets for managing waste?

The plan is a comprehensive assessment of the BPEO for managing Scotland's waste and the barriers which need to be overcome in order to meet the targets.

The involvement of a large number of stakeholders in developing the plan is one of its key strengths.

The plan provides a good framework to start changing waste management in Scotland

What progress is being made in meeting the targets set out in the Plan?

WRAP's objectives are complementary to the recycling objectives of the National Waste Plan, and we are already making good progress towards achieving our targets for developing the UK markets for Paper, Glass, Plastics, Wood, Aggregates and Organics as well as encouraging the financial sector to be more supportive of the Recycling sector. As examples, our targets include increasing the recycling of glass by 350,000 tonnes, increasing paper recycling by 500,000 tonnes, increasing plastic recycling by 20,000 tonnes and doubling the recovery of wood packaging to 350,000 tonnes.

Many of WRAP's UK initiatives are directly benefiting Scotland. As an example the expansion of the Shotton paper mill, which has been supported by WRAP, will increase newspaper

recycling by 321,000 tonnes and has already resulted in the mill sourcing more paper from Scotland. All of the R&D projects are also relevant to Scotland and a number of Scottish based organisations are taking up the results of some of the R&D projects. The introduction of the new compost quality standard PAS100 is also attracting interest from Scotland.

Specific WRAP activity in Scotland includes a capital grant for wood re-processing in Glasgow which will increase wood recycling by 17,000 tonnes per year and the Dryden Aqua R&D project near Edinburgh which is expected to result in the development of a 200,000 tonne market for recycled glass as a high quality water filtration media. Over 70 Scottish based businesses have also been assisted through WRAP's business development service. In February a comprehensive new programme for Scotland aimed at increasing the Scottish infrastructure for the production of secondary and recycled aggregates by 250,000 tonnes was launched. In May, WRAP held a reception in Edinburgh, which was attended by representatives of the Scottish Executive and Parliament, to outline its work in compost and for an extended organics programme in Scotland. Progress is also being made to stimulate the procurement of goods made from recycled products.

WRAP understands that many local authorities have submitted plans to the Strategic Waste fund and that implementation at a local level is now gaining momentum.

Do funding methods provide the right form of targeted support and incentives? / Is the level and method of funding through the Strategic Waste Fund appropriate to ensure that the Plan is achieved?

WRAP regards the funding which has been made available by the Scottish Executive as very generous and believes that the approach being taken in Scotland is similar to that in other European countries which have successfully supported collection and diversion of recyclable materials.

Providing that it is spent wisely, WRAP believes that the funding is adequate to achieve the diversion targets of the National Waste Plan.

Is the Waste Strategy Area approach working appropriately?

The division of Scotland into 11 areas has encouraged dialogue at a local level and is appropriate in relation to collection activities for MSW. However as the materials are processed it is important to recognise that geographic boundaries become less significant and indeed many markets are UK wide and some are international.

Can adequate markets for waste be developed in order to reduce landfill, and could market development undermine longer term efforts to minimise waste production?

Yes adequate markets can be developed. Market research undertaken by WRAP has confirmed that there are large potential markets for all recyclable materials and WRAP strongly believes that these markets can be developed successfully. However, it is very important to recognise that the ways in which the materials are collected and initially processed has a critical effect on the markets for which they can subsequently be utilised and their associated value. For some materials, such as plastics and organics, there is also a need to develop processing infrastructure to ensure that the materials can be made available to the markets.

At the current levels of waste generation and recycling there is plenty of scope for both increased recycling and for waste minimisation. Furthermore, our analysis suggests that such initiatives often work best when implemented in parallel.

Is the Best Practicable Environmental Option being achieved appropriately in practice, with particular reference to the differences between urban and rural areas?

The plan has encouraged local authorities and others to consider the various factors which make up the BPEO and it is understood that this takes transport into consideration.

As far as markets are concerned the development of national markets will benefit rural as well as urban areas. There are some opportunities for local markets (eg compost) and some processes can be viable at smaller scales.

It is encouraging to know that a number of local authorities are introducing kerbside collection and other segregated collection systems and that they are actively promoting recycling. However, WRAP understands that some may also opt for mixed waste treatments. Whilst this might provide a transitional option, we do not believe that this is the longer term BPEO. This is because we believe that better value and more sustainable markets could be achieved by processing segregated wastes, with mixed waste processing being used only for the pre-treatment of the residual waste before disposal. This is particularly important for organic waste in advance of the implementation of the EU Biowaste directive which is expected to make source segregation mandatory for compost products.

What initiatives are developing to improve management of non-municipal waste?

The various programmes within WRAP are aiming to develop markets for materials sourced from the non-MSW stream as well as the MSW stream. As examples, we are running projects relating to flat glass, wood from furniture manufacture, paper from commercial sources, aggregates, wood and plastic from construction & demolition wastes . WRAP is also aware of a number of other initiatives aimed at improving the management of non-municipal wastes both in terms of waste minimisation, reuse and recycling.

Are all stakeholders able to work effectively together, particularly where the Waste Strategy Area covers more than one local authority boundary?

From our perspective, WRAP has always been willing to work with other stakeholders and to co-operate at all levels. We have worked effectively with individual local authorities and have also contributed to various Area Waste Groups.

What contribution are local and community groups making to meeting the new targets and wider sustainable development objectives?

WRAP recognises that local and community groups can make a valuable contribution to both recycling and wider sustainable development objectives for example, in relation to collection activities, encouraging householder participation and furniture / white goods reuse & recycling.

Are the targets and priority approaches in the Plan appropriate, and do they adequately reflect best practice as well as existing legal obligations?

WRAP believes that the targets are appropriate and that they reflect legal obligations. It is however important to stress that the funding available through the Strategic Waste Fund should enable Scotland to maximise the value of recycling and not just minimise diversion costs. There is a risk that if the implementation relies on low value markets and outlets for mixed waste processing that this will not be sustainable in the longer term.

Does the Plan take account of likely future EU obligations, and how will it leave Scotland placed to meet the challenge of these new developments?

In the immediately foreseeable future there is a need for the plan to take account of the forthcoming EU Biowaste Directive. (see above)

Other Comments

First, there is a real challenge for us all in reconciling the stated desire for urgency in achieving greater sustainability in waste management with the actual length of time it takes, and can take, to effect change on the ground. Our approach at WRAP is to make urgent progress on our programmes wherever possible but also to build carefully in areas where progress may take longer but preparation work is still essential.

Second, it is vital that in the development of new initiatives on waste management the focus on the importance of the market is not lost. Recycling market development is a multi layered package of initiatives in which some of the lead times for new initiatives (e.g., in standards and in R&D) are medium to long term. It is crucial that market development is allowed to keep pace with increases in diversion so that sustainable markets for materials are achieved.

Finally, and most importantly, we must have a collective belief that the challenge we have set for us in the UK is achievable. At WRAP we believe it is, and will continue to share with others the lessons we learn from our own experience as well as continuing to share knowledge of good practice in waste management – as it develops into resource management - that has been achieved in many other developed countries.

Agenda item 3

**Environment and Rural
Development Committee**

24th September 2003

ERD/S2/03/06/3e

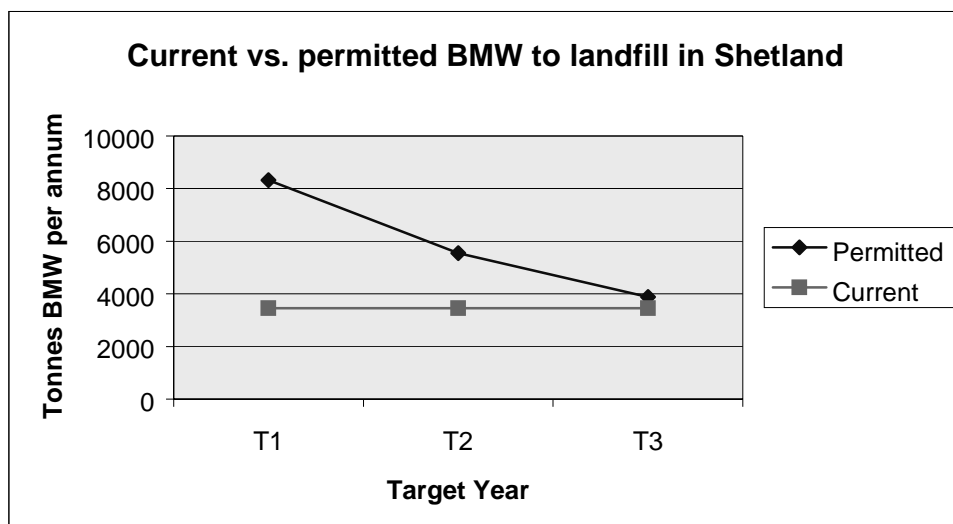
**SUBMISSION FROM LERWICK WASTE TO ENERGY PLANT
Inquiry into National Waste Plan**

1. Introduction

- 1.1 The following submission is based on the experience of the development of the Area Waste Plan for Orkney and Shetland and in particular how this relates to the waste management strategy in Shetland.
- 1.2 Shetland Islands Council have been operating a Waste to Energy Plant since early 2000. Much of the development of the Area Waste Plan was based on activities that complement the Waste to Energy Plant.
- 1.3 The Plant takes some 8000 Tonnes per annum from Orkney, 2000 Tonnes from the offshore oil industry and the remaining 12000 Tonnes from waste arising within Shetland.
- 1.4 The resultant combustion gases from the incineration process heats water for a district-heating scheme in Lerwick.

2. Targets

- 2.1 The 2020 Biodegradable diversions targets have already been achieved by Shetland. This is mainly due to waste processed through the Waste to Energy Plant. See graph below:



- 2.2 Shetland's current recycling rate is 22 percent and by 2006 it is estimated to be at 33 percent. It should be noted however that currently 17 percent of this relates to bottom ash from the Waste to Energy Plant being used as cover material on the landfill site. It has been suggested that the use of bottom ash for cover material in future will not be counted towards the recycling rate. If this is the case then our current rate would only be 5 percent and by 2006 it would increase to 15 percent.

- 2.3 On the assumption that the bottom ash used as cover material cannot contribute towards the recycling target then we will not be in a position to meet the 2006 recycling target of 25%. Although it is understood that this will be a national target and local targets will be set based on local Best Practicable Environmental Options.

3. Funding

- 3.1 From Shetland's perspective there is no issue with the funding methods mainly due to the fact that most of our waste will be managed through the Waste to Energy Plant and funding is only being sought for the recycling activities which complement the operation of the plant.
- 3.2 It is worth noting that the cost per tonne for managing waste and in particular recycling is much greater in Shetland. This can be attributed to:
- Complex and expensive collection logistics,
 - Longer and more expensive haulage of waste to re-processors,
 - Smaller amounts of waste handled. There are not the same benefits from economies of scale gained on the mainland and in particular the central belt.
 - Diversion of waste into recycling schemes generates relatively few savings, as the local authority is still required to maintain its other treatment and disposal operations.

4. Waste Strategy Area Approach

- 4.1 The waste strategy area approach is seen as being a useful method for discussions with other local authorities. This was not something new to Shetland and Orkney given that the Waste to Energy plant was designed to take waste from both authorities.

5. Markets

- 5.1 One of the key principles of BPEO for Shetland is self-sufficiency. This means greater emphasis is given to finding local solutions and markets. Examples of which include the Waste to Energy Plant used for district heating, shredded paper used for animal bedding and glass reprocessing used in construction blocks, foundations and decorative cover and currently being developed for shot blasting.
- 5.2 Some materials will inevitably go to mainland re-processors. There is a concern however that any increase nationally in the quantity of recyclables will reduce the value of the material and given the relatively high transport and handling costs experienced by Shetland this may ultimately mean that materials would be landfilled rather than recycled.

6. Best Practicable Environmental Option (BPEO)

- 6.1 Given that the Waste to Energy Plant was in place prior to the development of the Area Waste Plan the plant was always going to be an integral part of the strategy.
- 6.2 The plant has been subjected to a number of assessments and can be regarded as the BPEO for Shetland and Orkney. This is summarised as follows:
- Costs are comparable with alternative options. (As per Waste Management Plan 1992)
 - 18 direct jobs created at the Waste to Energy Plant and 5 at the District Heating Company.
 - There is a direct benefit to local residents and commercial premises (potentially up to 1500 premises in Lerwick) through the supply of cheap heat
 - There is a financial benefit to the Shetland economy through the sales of heat at £350,000 per annum (increasing by £60,000 annually). Savings on fuel bills estimated at £200,000 per annum. There is also the value of associated installation works carried out by local contractors.
 - For the vast majority of premises in Lerwick are either heated from electricity, oil or district heating. By using district heating (typically about 50% of the cost of electricity for the consumer) there is a reduction in fossil fuel consumption given that Shetland is not on the national grid and electricity is produced locally by burning oil at the power station.
 - Emissions from the Waste to Energy Plant meet all existing and anticipated future standards.
 - There is a significant contribution to the Council's Home Energy Conservation Act obligations.
 - Metal recovery takes place from the plant.
 - Bottom ash substitutes the need for virgin material to be used as cover material at the local landfill site.

7. Non- Municipal Solid Waste (Non-MSW)

- 7.1 The Council in Shetland has a key role in finding a solution for non-MSW arisings given that it either collects and or provides the disposal route. This is because the poor economies of scale tend to mitigate against any major private sector investment.
- 7.2 Funding is being sought for either equipment or a study into solutions for the recovery and recycling of non-municipal waste. Two areas in particular include tyres and cages from fish farms. It is recognised that priority for funding has been given at this stage to MSW and therefore

it is likely that these projects will have to wait until suitable funding is found.

8. Stakeholders

- 8.1 An Area Waste Group for Shetland was formed in June 2000, which consisted of a number of stakeholders representing the local community, community organisations, waste management companies and producers, SEPA and the Council.
- 8.2 A sub group was subsequently formed to provide the detail for the plan and report back to the main group.
- 8.3 This approach worked well. However given the distance, cost and time required to have meetings with stakeholders in Orkney, a parallel approach was adopted in Orkney rather than having ongoing joint meetings. Communication and co-ordination however was maintained to ensure a consistent approach.
- 8.4 A number of recycling activities are and will be carried out by community groups and as such are regarded as having a significant role in the process.

9. Best Practice

- 9.1 The targets and priority approaches in the plan are based on BPEO for Shetland, which has had wide consultation and are therefore considered to be appropriate.
- 9.2 The integrated waste management package of waste prevention, recycling, the Waste to Energy plant and landfill is regarded as BPEO and therefore seen as best practice for Shetland's circumstance.
- 9.3 There is a concern however that national legislation, national targets, and generic guidance, based purely on driving waste up the waste hierarchy, irrespective of local circumstance, could have an influence on the application of the BPEO for Shetland, particularly because of the reliance on the Waste to Energy plant.
- 9.4 The plan does take account of likely future EU obligations by considering, for example additional collections of household hazards waste and waste electrical and electronic equipment.

Agenda item 3

Environment and Rural
Development Committee
24th September 2003
ERD/S2/03/06/3f

LOCHABER ENVIRONMENTAL GROUP

BUIDHEAN ARAINNEACHD LOCHABAR

We would like to raise three points:

1. Waste minimisation. Minimisation is central to the success of changes in waste management and we need legislative action from the Executive to assist this element.
2. Community participation. There is a mixed picture. Work in some areas such as re-use of furniture and household goods is developing well. We are in danger of losing much of the experience and enthusiasm of the community sector in the field of general public awareness. We need to think of measures to prevent this and these could include:
 - ensuring that initial bids for SWF support do not close the door permanently on the possibility of inclusion of community groups at a later stage.
 - training community groups in how to prepare bids for local authority contracts
 - re-assessing the need for a focus on tonnage diversion.
3. Local composting. Composting is a central part of changing people's understanding of waste. Promotion of home composting should be accompanied by the development of a series of community composting sites to take garden waste and municipal arisings from grounds maintenance work. The Executive should ensure that;
 - an adequate system is established to include home composting in targets
 - we ensure that the SBPO does not discourage councils and communities from treating garden waste locally.

Susan Carstairs
19.09.03