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Date : 11 December, 2003

Dear Sir or Madam,

**‘A WAY WITH WASTE’  
A DRAFT WASTE STRATEGY FOR ENGLAND AND WALES**

Further to the above, please find below the comments of Hertfordshire County Council which it is hoped will inform the final version of the strategy to be published towards the end of the year.

**The Philosophy behind the Draft Waste Strategy**

The County Council welcomes the Governments view that all future waste management strategies should adhere to the aims of sustainable development and agrees that Best Practical Environmental Option (BPEO) should be adopted as the key principle towards achieving sustainable waste management. The County Council also accepts that the two additional principles of the waste hierarchy and the proximity principle can act as a starting point when assessing BPEO, but it believes that the Government must recognise that, within these principles, there exists the potential for conflicts.

With recycling, for example, the absence of a widespread network of reprocessing facilities could mean that the BPEO for a particular wastestream might not include sufficient material recovery to meet the targets that are outlined in Chapter 3. The conflict between the proximity principle and the objective of moving waste up the waste hierarchy would be very apparent in areas that are not adequately served by local reprocessing facilities.

In the context of the proximity principle, the Government needs to clarify what it means by its use of the term ‘long distances’ in paragraph 1.10.

The County Council is acutely aware of the likelihood that the BPEO for Hertfordshire's waste will include technologies, such as incineration, that the residents of Hertfordshire may feel uncomfortable with because of the potential for hazard to human health. It therefore welcomes the news in paragraph 1.5 that the Environment Agency and the Government is currently carrying out further research into possible health effects of the various types of waste facility. It is absolutely vital that the Government invests appropriately in this research, and that the results are fully and properly communicated to the general public. The National Waste Awareness Initiative will be the ideal vehicle for informing the public both of the reasons why new waste management facilities will be needed, and of the possible impacts on human health that could result. This information will be vital to local authorities in their promotion and implementation of sustainable waste management practices.

Against this background, the statement in paragraph 3.7 that "it is important to recognise that in future there will be diverse technologies which might contribute to the recovery of both materials and energy to varying degrees" will not be helpful to local authorities when they are inevitably faced with making a long term commitment to a particular technology in order to meet their own local needs.

One of the more difficult challenges for any successful strategy will be to make provision for future growth in household/municipal waste arisings. Paragraph 3.3 suggests that an annual figure of around 3% might be a reasonable estimate although no source is quoted. In Hertfordshire the municipal wastestream increased by approximately 30% in the ten years leading up to the introduction of the landfill tax and so, the estimate would appear to be justified. However, in the 3 years since the introduction of the landfill tax, Hertfordshire's municipal waste has grown by more than 12% and therefore, it might be reasonable to assume that a higher level of growth will need to be provided for. Furthermore, the increasing cost of waste disposal, and the growing scarcity of suitable disposal facilities, might well lead to wastes that are currently within the commercial and industrial streams, placing an additional burden on Waste Disposal Authorities by transferring into the municipal stream. Equally, the trend towards lower house occupancy levels will almost certainly also add waste to the municipal stream over and above that resulting from population increases. The County Council believes that the need for quality waste data to inform accurate forecasting, is therefore of paramount importance.

Another main theme of the draft strategy is an objective to reduce household waste arisings through mechanisms aimed at the householder and local government. The County Council believes this to be unreasonable insofar as neither party has very much control over the quantities of packaging that are released into the stream, largely motivated by pressures to market consumer goods. While the householder and local government is charged with dealing with the problem, the commercial sector will continue to invest in marketing at the expense of the environment.

## **Targets for Recycling, Composting and Recovery**

The County Council agrees that targets are a useful mechanism towards achieving sustainable waste management but it makes the observation that the proposed targets for recycling, composting and recovery might not concord with the BPEO for the wastestream.

The target to reduce industrial and commercial waste to landfill to 85% of 1998 levels makes a good deal of sense but the Government must recognise that the impact of this target could be felt by Waste Disposal Authorities if the effect is to force more waste into the municipal stream. Since the introduction of the landfill tax we have seen an increasing tendency for the householder to seek alternatives to commercial skip hire for the disposal of bulky waste. The increased cost of skip hire is persuading the public towards the use of Civic Amenity sites instead and, as a result, the municipal wastestream is increasing. For the target to be imposed, the 1998 levels will need to be established and account should be taken of the cultural shift that is gradually going on.

The targets for recycling, composting and recovery appear reasonable in the long term although they will clearly pose a significant challenge to waste collection and disposal authorities. Achievement of the targets will only be possible through the provision of new waste management facilities which will not appear 'overnight'. The democratic processes involved in the establishment of new facilities will take time. Given that the intermediate targets proposed for 2005 do not represent a linear progression from the current performance levels towards the targets set for 2010, the County Council suggests that the intermediate targets are unreasonably high. Would it not be preferable for local authorities to have an obligation to demonstrate by 2005 that they are constructively moving towards achieving the 2010 targets?

## **Recycling and the Markets for Secondary Materials**

The County Council acknowledges that the Government's vision will only be achieved by the development of a substantial number of new facilities and that extensive kerbside collection of recyclables is likely to be necessary. It also agrees with the view that WCAs and WDAs must work together to meet the proposed targets. The County Council is, however, concerned that increasing recycling levels will incur additional cost that will need to be funded. This will be especially significant to those WCAs that do not currently provide extensive kerbside collection services. The performance of each WDA will be ultimately determined by it and its District Councils' ability to fund higher levels of recycling and recovery in the face of insufficient reprocessing capacity and falling secondary material values.

The concept of consortia to address these problems is indeed sound and has already been followed in Hertfordshire with the Hertfordshire Glass and Paper Consortiums. It does not follow, however, that the markets can cope with more consortia without a corresponding depression of the prices offered for recyclates. More consortia could drive prices down!

What will stimulate an increase in reprocessing capacity? It appears that market pressures do not have the effect of putting new facilities in the right places such that a suitable UK network is established!

PRNs are intended to stimulate markets and there is perhaps emerging evidence that they might be beginning to have an effect. There is a view, however, that the PRN system is not working to the benefit of local authorities who recover significant quantities of recyclate and it would therefore be advisable for the system to be reviewed. As an instrument aimed at increasing recycling levels, it might be beneficial for the Government to set PRN values and take steps to ensure that local authorities are recipients of the corresponding increase in material value.

One particular statement within the draft strategy that the County Council takes issue with, is that in paragraph 3.11 that claims “the record for recovering municipal waste is much less good than in the industrial and commercial sectors”. This is extremely unfair in that the municipal stream is generally devoid of those materials that the industrial and commercial sectors find economically viable to extract for recycling. We are generally left with the ‘rubbish’!

### **Education, Information and Awareness Campaigns**

The County Council welcomes the Government’s commitment to the National Waste Awareness Initiative and intends to fully integrate its own ‘WasteAware’ campaign within it as far as it is able. It does, however, have concerns over the target audience, hoping that it is not restricted to the householder who, as has been said above, is not always in control of the waste he/she is handling. The householder, who can clearly make a difference, is nonetheless very often a victim of marketing with little incentive to resist its pressures.

Far more significant to the County Council is the need for the general public to have its unfounded anxieties over the health effects of various waste management facilities either allayed or put into the context of the alternatives. It is vital that Government takes a lead in this respect otherwise the various pressure groups might have the effect of preventing progress towards truly sustainable waste management

### **The Role of Local Authorities**

The County Council recognises that an integrated approach to waste management is essential and that, as a WDA, it must work closely and in co-operation with its district and borough councils in their capacity as WCAs. It recognised this need more than two years ago since when it has signed a memorandum of understanding with all 10 Hertfordshire District and Borough Councils with a view to working together to devise a joint waste management strategy for the County. The County Council is concerned therefore that the uniquely highlighted statement in paragraph 4.52 that refers to the possibility of waste management authorities being formed, could be counter-productive in that it might undermine joint working initiatives such as that in Hertfordshire. It would be useful to have some indication of what a WMA might look like and what it would take to provoke the Government into forming one.

The suggestion that Regional Waste Management Groups would be valuable as a means of bringing together the various ‘players’ in the waste management industry is, in the experience of Hertfordshire, very sound. The County Council is a member of the Anglian Waste Management Group which comprises representatives from WDAs, WCAs, LAWDCs, Environment Agency, HM Customs & Excise, Institute of Wastes Management and ISWA. The Group is very successful in sharing valuable information and providing stimulating debate on emerging issues and it serves as a good model for others that could be set up elsewhere.

### **Financial Arrangements for Waste Management**

The County Council welcomes the statement that the Government recognises that the move to more integrated, sustainable waste management could incur costs to local authorities (4.64). In fact, it feels certain that it will. It agrees that there is a need for Government to provide more resources to local authority waste management and therefore it urges the Government to keep its promise of considering options as part of the next Comprehensive Spending Review. An effective countywide strategy will require adequate funding at both County Council and District Council level and WDAs will not succeed without the appropriate financial commitment of their WCAs!

A concept of a separate SSA for waste management might merit serious consideration.

The County Council also welcomes the Government’s commitment to a review of the recycling credits scheme because it believes the current scheme to be a barrier to an integrated approach between WDAs and WCAs. At the very least, there should be a requirement for WCAs to ‘ringfence’ its credits for investment back into its recycling activity. It will be interesting to see whether or not the additional £3 a tonne in credit level as a result of the increase in landfill tax has a significant effect on recycling performance.

### **Waste Planning**

The County Council feels strongly that an appropriate network of new waste management facilities will be difficult to develop without suitable planning guidance. It is hoped that the forthcoming revisions to PPG10 and 11 will provide the quality of guidance that will be needed to see the Government’s vision achieved.

### **The Role of the Environment Agency**

The County Council looks forward to the Life Cycle Assessment tool that the Agency is currently developing, in the anticipation that it will usefully inform the process of devising sustainable waste management strategies.

More importantly, the County Council feels that the need for high quality data is vital to the achievement of the Government’s vision and that the Environment Agency should commit a significant proportion of its resources to researching, compiling and publishing the data that will be required.

Thank you for the opportunity to comment, the County Council hopes that its comments will be seen as constructive and of value in preparing the final strategy.

Yours faithfully

Ray L Greenall  
Head of Waste Management