

Regional Waste Plan First Review Consultation Response – Dec 2007

Please accept this as Cylch's (Wales Community Recycling Network) response to the consultation on the First Review of the Regional Waste Plans for Wales.

For the purposes of this response Cylch has used the structure of the survey questions as a framework, except for this first paragraph.

Cylch is concerned that the Regional Waste Plans in Wales are based on assumptions that are continuously being challenged and refuted. These include:

1. That recycling collections are an expensive addition to waste collection and treatment.
2. That waste arisings are going to continue to rise, whilst in fact tonnages are increasing but the amount of material/waste needing serious collection and disposal treatment is falling because of higher recycling, re-use and composting achievement.
3. Zero Waste aspirations and 70% targets are, at last, being accepted as achievable in the UK – this must impact on regional waste plans dramatically yet there is no sign of that. We are continuing to hear of plans to burn, pyrolise, cook, gasify or autoclave huge tonnages that won't exist.

Future plans must recognise that waste elimination and the encouragement of a new industry around the re-use of secondary materials is an investment to save. There is a huge opportunity to spend the money on genuine sustainable economic development - creating new wealth without increasing resource depletion.

Shaping the Regional Waste Plan

Do you agree with the Vision for the Regional waste Plan 1st Review? Do you agree with the Aim s of the Regional waste Plan 1st Review?

The mission and aims seem fair, however Cylch would question if these are the aims of the 1st Review or of the Regional Waste Plans themselves.

How Much Waste

Would you propose other types of facilities that are not on the list, to be considered to deal with the waste generated in your region?

Apart from the concern of diminishing waste tonnages expressed above Cylch's other concern is that waste and re-use, recycling and composting facilities are being bundled and talked about as "waste facilities". These facilities are vastly different – very few of our facilities operate under a waste licence despite shifting tens of thousands of tonnes of material per annum.

Cylch suggests that the regional waste plans observe this discrimination in the spirit of actually wanting these facilities to come into existence.

Cylch questions why there is no mention of reuse. Although reuse may not accommodate vast tonnages at present, it is second in the waste hierarchy (following only reduction) and it would therefore seem prudent to make some mention of this as a method. Reuse is not limited to just municipal waste but can also be related to commercial, industrial and construction and demolition wastes.

Are the indicators used to assess the Technology Options suitable? Should additional indicators have been used in assessing the technology options?

- It is essential to include indicators relating to Climate Change as this consideration should dominate the assessments. It will be unforgivable to recommend technologies that are unnecessarily damaging in this respect.
- Cylch suggests that in the future other socio-economic indicators should be included – so that Wales can be true to its Sustainability mandate. Indicators used in Social and Environmental Auditing are a good guide.
- Cylch also suggests that perhaps there should be some indication as to how the Option in question contributes or not to other strategies as integration is a key component of the sustainable development agenda.
- Cylch suggests that indicators relating to soil quality, humic fraction, water retention/porosity and carbon content could be added to the environmental set.

Do you think the explanation of treatment options is sufficient for you to understand the differences in them?

Cylch believes that it is necessary to have explanations of the different treatment options but that it would perhaps be more useful to have the pros and cons of each one clearly laid out. It is important to differentiate between natural and energy input-intensive processes.

Whenever this kind of research is delivered there always seems to be a bias in favour of the most expensive, least labour-intensive, most technically risk-averse model.

Which of the options below and itemised on page 16 is your preferred choice? Please rank them in order of preference (1 being the option you most prefer and 7 being the least preferable option).

Cylch recognises the need to assess options and to arrive at a preferred way forward. However, Cylch would suggest that it seems a little irrational to come up with one option for all the different waste materials that are available for all sectors that result in waste arisings, clearly the needs and most suitable option for hazardous wastes will be different to more innocuous waste materials.

Cylch would surmise that this is the reason why some options, such as Option 2d Anaerobic Digestion, have been omitted from the consultation as they may not be suitable methods for some hazardous materials and therefore all residual materials.

If, however, we considered the best option for more than 1 type of residual then we may get the best overall option – i.e. if the best option for municipal residual is X then the best option for hazardous residual may be Z but you may end up with Option Z for everything purely because by ruling out other options that are not suitable for all then that becomes the best option.

All of the options listed except for 2c and 3c result in some form of refuse derived fuel – is there a substantial enough market for the amount that is likely to be produced, or are we likely to end up with surplus RDF? In addition, 5 of the Options release carbon dioxide which is a major contributor to climate change and all result in fly ash which would need to be disposed of to hazardous waste landfill.

If pushed for a response then Cylch would have to consider that assuming the results of the analysis and appraisals are accurate, then we have to accept the findings, that in terms of Sustainability Appraisal 2a, 2c

- **Sub-Option 2a** – High source segregated recycling and composting levels with all remaining residual wastes, where possible, being managed by high levels of **pyrolysis**
- **Sub-Option 2c** – High source segregated recycling and composting levels with all remaining residual wastes, where possible, being managed by high levels of **incineration with energy recovery**

have come out as 1 & 2 .

The SEA finds no clear leader, neither does the Health Impact Assessment which suggests options 2, 3, and 4 are good. In that case as an advocate of sustainable development we would have to opt for option 2a, but with the reservations listed above.

Other concerns that Cylch wishes to raise relate to the building of facilities that will not be needed in the future as waste continues to decline and we design it out; or building facilities that due to their nature require a certain throughput that will then lead to sustained rather than diminishing amounts

of residual waste. We may meet the Landfill Directive targets but are we really looking at the best long-term option? The length and nature of contracts is also a concern. In addition the impacts of peak oil will be dramatic in that transporting materials any distance will have massive economic impact – this bodes well for the proximity principle and considering a strategic (resource security) reason for local market development.

The Health Issues

Did you find the final Draft RWPR HIA Report & Summary useful in informing you about the potential positive and negative health impacts? Do you have any health concerns regarding any of the specific Options? Do you have any health concerns regarding the waste treatment technology options identified in the strategic option? Were there any health issues that were not covered, or poorly covered, in the final Draft RWP 1st Review HIA Report and Summary?

The HIA appears to be fair.

The Implications for Planning

Are the objectives for the Areas of Search suitable? Should additional objectives have been used? Any other comments?

The work undertaken under the Areas of Search appears to be fair.

Additional questions for Strategic / Informed Stakeholders **Comments on calculations**

- **Apportionment of the total capacity required at various types of waste management/ resource recovery facilities in 2013 to each Unitary Authority area on the basis of forecast arisings;**
- **Calculation of an indicative new capacity required and a new non-landfill waste management / resource recovery facilities by 2013 in each UA area;**
- **Forecasts of the remaining landfill void in 2013 in the region.**

Cylch would like to make the following comments

- Following the Ministers recent indications that she would like to pursue higher recycling and composting targets over the coming years through the forthcoming review of the National Waste Strategy for Wales – Wise About Waste – it seems possible that the amounts of residual waste may fall, amounts of resources for recycling and composting may rise, and therefore the capacity requirements of various facilities will change.
- That different methodologies impact on the capacity of facilities. For example, the Cleanstream (source separated) method of collection that is advocated by Cylch can be easily up-scaled to increase capacity as it does not necessarily require more space or a new building. Capacity therefore

will depend on the methodology adopted as well as the type of facility and the type of activity that is undertaken there.

Do you have any comments on the guidelines that individual Unitary Authorities may wish to follow in bringing together the RWP Technology Strategy and the RWP Spatial Strategy through the Local Development Plan preparation process in their individual Unitary Authority areas in order to identify appropriate sites for waste management/ resource recovery facilities?

- Facilitate opportunities for genuine community consultation.
- Cylch and its sister organisation in England and Scotland have over 1200 organisations throughout the UK as members. Each operate re-use, recycling or composting facilities that look like depots, have trucks, some are noisy operations, some materials handling, some bulking, storing and transporting of materials back to market. Very few of these operations have ever been objected to in the community – there are no petitions, picketing or raised voices over these operations because they are *not* waste facilities nor are they seen as such by their neighbours. Recycling doesn't happen successfully nor sustainably without complete citizen participation so people are and must be at the heart of this aspect of Sustainable Development.

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