

Vale of Glamorgan Council

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VALE of GLAMORGAN



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Ms Sarah Beasley
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Dear Ms Beasley

Consultation : Proposed Recycling Measure

Thank you for the opportunity to comment on the proposed Measure relating to the additional statutory requirement on local authorities relating to their current non-statutory municipal waste recycling activities.

The following comments are those made by myself and there has been no reference to my council's Elected Members or its Executive.

Whilst I will address the specific questions that are listed with Part 3 of the consultation document, I do feel that this cannot be done without initially commenting generally on the proposal. I therefore offer the following observations prior to addressing the specific questions as requested.

It is with some surprise that given that there already exists a reporting mechanism under the control of the Assembly and that Defra is currently undertaking a second consultation on 'Controls on the Handling, Transfer and Transport of Waste' that includes proposals for revising the Transfrontier Shipment of Waste that looks at extending the Duty of Care under Section 34 of the Environmental Protection Act 1990 (EPA90) to those exporting waste and stricter controls on waste transfrontier shipments with businesses supplying the EAs with additional information that this is an appropriate time to even make such a proposal.

It is also disappointing that the proposal only relates to municipal waste, which only constitutes a small percentage of any waste exported or recovered outside the European Union (EU). Given that the consultation paper itself states that the devolved Government in Scotland includes measures on all public sector bodies and businesses. Failure to consider similar provision within this Measure is a significant lost opportunity.

If the reason for proposing this Measure is to ensure that the recyclable waste is properly recovered then clearly making regulations on commercial and industrial waste producers, specifically requiring businesses to send waste data returns to the Environment Agency (EA) would be far more environmentally friendly.

By once again targeting local authorities the Assembly is missing the bigger picture and simply hitting the easy option.

This is clearly the case within the policies of 'Wise about Waste' and this proposal would appear to continue that policy.

I would strongly support the proposed measures of the Scottish Government and suggest that these measures would be more appropriate for consideration by the Assembly in November.

Notwithstanding this, I would also question the need for the proposed Measure as the detail required should already exist with the Assembly's own Municipal Waste Database 'Wastedatabase'. I totally fail to see why this existing database cannot be used by the Assembly to publish the desired information without imposing any additional legislative or resource burden on local authorities.

To comply with the Measure would appear to be a duplication of effort and existing reporting capability. Surely where a system already exists there can be no reason for creating a second one.

It is always interesting where 'key principals' appear to justify a policy or proposal, the 'proximity principle' and 'regional self-sufficiency' being two of the most interesting. Taken to extreme this would be an unbending rule that all waste arising in the region (Wales) would need to be managed 'cradle to grave' within the region.

As the delivery of local recovery facilities in Wales is insufficiently developed to meet the needs of business at present and/or local authorities strict interpretation of these principles would probably result in recycling performance diminishing significantly in Wales, something that clearly is not the intention of the proposed Measure.

I would also express reservations that implementing the Measure will lead to increased interest and therefore participation in recycling. Where local authorities may wish to make public that municipal waste is recycled overseas because it is the only available market to their reprocessor, this could equally result in householders being annoyed given the bad media coverage of third world reprocessing conditions, with their vexation resulting in reduced participation.

Whilst I would agree that it will encourage householders to want local authorities to use recycling facilities that are closer to the point of arising. Where these facilities do not presently exist or where they do but charge a premium rate, there would be a negative overall affect on recycling services and a general disquiet their local authority provision irrespective of attainability and/or Best Value.

It is unlikely that our council taxpayers will accept that local authorities should manage waste as far as is practicable close to the point of generation. They will however expect them to adopt a recycling solution that is economically sustainable with no additional burden on their council tax.

Having provided general comments on the overall proposal, I would now offer the following specific comments on the consultation questions.

Q1 : Do you think that the proposed Measure will achieve the desired aim of improving transparency and openness in the way that Welsh local authorities deal with recycle?

As local authorities already have significant reporting procedures in place (National and Local Performance Indicators, Improvement Plans etc) it is of some concern that the Assembly feels they need to improve transparency and openness in the way they deal with recycle. There is also little need to make a legislative Measure on local authorities as the information is already available on the Assembly's Wastedataflow database.

Surely it would be simpler for the Assembly to use this information and publicise it directly as it does with local authority recycling /composting and land-fill allowance performance.

Q2 : Do you consider the proposed Measure is the best means of improving transparency and openness in the way that Welsh local authorities deal with recycle? If not, which other approaches should be use?

To reiterate the comments made in Question 1 – the use of the Wastedataflow database would be more appropriate. It would eliminate any element of wasteful duplication of effort and resources between local authorities and the EA whilst providing the outcome required in the proposed measure.

Q3 : Are there additional powers that could be included in the Measure to further promote this approach in local authorities?

As I do not feel that the Measure is needed, there would be no requirement for additional powers. However, I would take the opportunity to lobby the Assembly to consider taking powers to place a duty on businesses to provide recycling data returns to the EA similar to those proposed by the Scottish Assembly.

Q4 : Do you consider that the implementation of the proposed Measure would lead to residents encouraging local authorities to use recycling facilities that are closer to the source of the recycle than those that are further away? Do you agree that the publication of the required information will lead to increased interest and therefore participation in recycling?

Whilst I believe that publication of the information will result in residents calling for local authorities facilities where they are presently or either non-existent or extravagantly highly priced this will potentially eventually result in dissatisfaction and reduce participation.

It is fairly apparent in the present economic climate that residents will be reserved to encourage any local authority initiative that may result in increased cost to the council taxpayer.

Q5 : What unintended consequences, if any, could arise from the implementation of the proposed Measure?

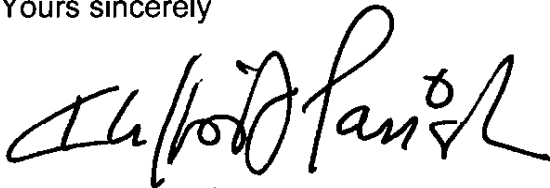
As stated in my answer to Questions 3 and 4 where there is the possible peril that the Measure could prove counterproductive for local authorities meeting Assembly recycling targets.

Q6 : What do you estimate the costs of complying with the proposed Measure to be for your organisation? Do you consider these costs to be excessive?

Should it not be possible for local authorities to use existing information retrieval systems such as Wastedataflow, then there could be significant new costs for my authority. Even without the creation of new reporting procedures any additional requirement is an extra financial burden requiring staff time now spent on other work. With the present and reported local government budget settlements it would be my contention that any additional costs would be excessive within the contemporary fiscal climate.

I hope that my comments have been of some interest, should you require any additional clarification or amplification on the observations made, please do not hesitate to contact me.

Yours sincerely



Clifford Parish
Operational Manager Waste Management and Cleansing
Rheolwr Gwaith Rheoli Gwastraff a Glanhau