

SWR 6

Response to the consultation on the Proposed shipment of Waste for Recovery (Community Involvement in Arrangements) (Wales) Measure



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26th September 2008

Dear Sir,

The Welsh Assembly Government Consultation – Proposal for a Measure relating to recycling

Veolia Environmental Services is the UK's number one waste management company, delivering environmental services to more than 16 million people. Conscious of our social and environmental responsibilities, we promote the use of sustainable waste treatment methods to recover valuable raw materials to our 73,000 commercial and industrial customers and 100 local authority partners.

Globally, Veolia Environmental Services employs over 80,000 people and serves more than 45 million people across 35 countries. It is the only worldwide provider of a full range of services for handling solid and liquid waste, and provides waste management and logistics services, as well as materials recovery and recycling. Veolia Environmental Services generated revenue of €9.2 billion in 2007.

Veolia Environmental Services (UK) Plc's comments on the Welsh Assembly Government Consultation – Proposal for a Measure relating to recycling are attached. We hope they are of value to the consultation process.

If you would like to discuss any of these matters further with a Veolia Environmental Services (UK) Plc representative, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Gill Weeks", with a horizontal line underneath it.

Gill Weeks
Regulatory Affairs Director
Veolia Environmental Services (UK) Plc

Welsh Assembly Government Consultation – Proposal for a Measure relating to Recycling
Resolving the consultation on the Proposed shipment of Waste for Recovery (Community Involvement in Arrangements) (Wales) Measure

We understand the desire to introduce greater transparency and openness in the way that the Welsh Local Authorities deal with materials destined for recycling and, in principle we support the initiative. However, it is not clear whether the ultimate desired effect of these proposals is to ensure that all of the waste generated in Wales is treated locally, or whether the Measure seeks to restrict exports to England and mainland Europe. Currently a large percentage of waste materials generated in Wales are sent to England for processing, treatment and disposal.

We have some very real concerns about the Measure for the following reasons:

- Most of the waste produced in Wales is not dealt with by facilities within the Welsh boundary; the volumes produced would not justify local facilities.
- The UK manufacturing base has reduced in size and there is a very limited market in the UK for recycled plastic
- Material is being legitimately exported from the UK to approved recycling facilities overseas. This practice is set to continue and has been shown to be environmentally sustainable (*CO₂ impacts of transporting the UK's recovered paper and plastic to China - WRAP August 2008*).
- This Measure might deter people from recycling if they do not understand fully the complexities around recycling, and the complex dynamics highlighted in the WRAP report.
- The destination for the collected material will vary depending on transport availability and spot market prices in the UK. So, the picture will be changing constantly and it will be difficult to keep everyone properly informed.
- The proposals deal with municipal waste only, leaving a large proportion of material not included. The whole of the waste stream should be seen as a resource and recovered wherever possible.
- Prices on the worldwide market are often higher than could be achieved in the UK alone. If restricted, this could affect the benefits passed to the local authorities.
- The tabloid press will certainly use any information in order to stir up public concerns. This will lead to pressure on politicians not to allow any exports and ultimately affecting the cost benefit. .

We agree with the concerns highlighted in the Measure that material has been exported previously which does not meet the required standards, and as such can cause problems to the receiving country. We support the use of quality standards and we would urge Government to make adequate resources available to the Environment Agency so that they can police environmental crime properly. Exports of inappropriate materials should not be tolerated.

To address the specific questions set out in the proposal

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?

For the reasons mentioned above there is a danger that any bad publicity surrounding the export of materials might mean that some people stop recycling their waste. Authorities may be pressurised into using local solutions that are more expensive and less sustainable.

Q2. Do you consider that 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 used?

We think that transparency and openness can be achieved by giving general figures on an annual basis showing the destination country and facility type, for all waste flows into and out of Wales. This should be available from the Environment Agency using WasteDataFlow, but data on material being exported as 'green list' is not currently collected. This could be improved.

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

The Duty of Care regulations and the TFS Regulations could be amended to require the tracking of green list waste

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 recyclate, than those that are further away? Do you agree that publication of the required information will lead to increased interest, and therefore participation, in recycling?

It would not necessarily be 'better' to have local facilities; China and India need raw materials to manufacture the goods that we import into the UK. As stated above, we believe that the majority of the population will instinctively associate exports of material as a 'bad thing', without understanding the full environmental impact. The UK has little manufacturing business, and we would have difficulty finding uses for all the paper and plastic, even if recycling facilities were to be built.

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

We believe that there are a number of unintended consequences of this proposal including:

- Public pressure on the politicians to stop exports to non EU countries and,
- A decrease in recycling levels and an increased use of raw materials in countries such as China and India.

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?

The data recording could be complex and expensive for all parties. The reason is that materials from different sources and areas get consolidated in various locations, and the network changes frequently. We suspect that the final cost to the local authority will be significantly higher as a result of these measures.