

GAIN
(Guildford Anti Incinerator Network)
Response to the Surrey Waste Partnership consultation on the Plan for Waste
Management in Surrey

Question 1. Targets

This question refers to Policy 4 within section 3.4 in the consultation document.

In 2006 our policy was to aspire to reach a long term-target of 60% recycling and composting by 2025. Recent progress and current performance in some districts and boroughs of over 60% recycling have led us to revise this policy. Our new proposed policy is to commit significant efforts and resources to achieving and exceeding an overall household reuse, recycling and composting target of 70% by 2013/14. *(note: Policy 4 in the consultation document omits the word 'reuse' – this would seem to have strayed into the website version).*

Q1.To what extent do you agree with this revised policy?

We were very pleased to be invited to the 'stakeholders' workshop and to learn more about the Surrey Waste Partnership, (SWP), which we hope will go from strength to strength.

We welcome and strongly support a commitment to a recycling/composting target of 70% by 2013/14.

The policy indicates that the achievement of a rate of recycling/composting above 70% is now considered possible – this is very positive and encouraging.

We note the much-improved results from those Waste Collection Authorities, (WCA's), collecting food waste and that South Oxfordshire claim to have achieved a 70% recycling rate.

We hope that the Surrey Waste Partnership will take the lead in the evolution of best practice recycling collection services across the county. To achieve the new target the county must involve residents and make participation simple. Our view is that source separated kerbside collection of recyclates is the 'world class' system we should aim for in Surrey. WRAP also supports this view - we comment more fully on this in our answer to Question 3.

We believe that food waste collection will play a crucial role in securing the 70% target and welcome the recognition that anaerobic digestion, (AD), is the most appropriate treatment technology to deal with this.

It is also essential that the SWP ensures that our contractor, SITA, promotes and maximises recycling opportunities rather than taking a laissez faire attitude to the 'out of county' incineration of residuals.

The government is just entering a consultation period on the implementation of the Waste Framework Directive, (WFD). Now, and in the future we hope that the SWP will seek to influence national thinking on both waste prevention and recycling.

In particular, we should lobby for further packaging regulation and the extension of producer responsibility, so that the 'polluter pays'. Any essential packaging should be reusable, recyclable or compostable.

We note that the SWP recognises the need to monitor the composition of the waste stream. As food waste collections become effective across the county, the monitoring of the composition of residuals should clearly demonstrate to government the reduction in biodegradable content.

Home composting should continue to be supported and promoted as the most sustainable and cost effective option.

We are glad to see that the consultation document recognises the important part Community Recycling Centres, (CRC's), can play in achieving the 70% target. User friendly, comprehensive facilities should be our ambition. Helpful, knowledgeable staff, good traffic flow management, clear signage and a clean and tidy site give visitors a positive impression of waste services generally and encourage positive and responsible behaviour.

Question 2. Waste reduction Programme

This question refers to Section 3.3 'Waste Awareness and Prevention' in the consultation document.

The revised waste reduction programme aims at providing all sectors of the community with the tools and knowledge to improve the way that they manage their waste in a sustainable and cost-effective way. Our proposed target is to reduce municipal waste by 15,000 tonnes by 2014. The draft strategy proposes a number of ways in which residents can contribute to this reduction target by changing their behaviour towards specific waste materials

Q2. Given that the waste reduction programme will require additional resources, which TWO of the five priority areas listed below do you think will be most effective in helping to reach this target?

Priority Areas

Food waste reduction

Green waste reduction

Reuse of bulky items such as furniture and white goods

Encouraging the use of reusable nappies

Junk mail reduction

There are really two strands to this question. Firstly, there is the prevention strand – encouraging the consumer to only buy goods that can be reused, recycled or composted. Secondly, there is the reduction strand, which seeks to reduce arisings by 15,000 tonnes. These two strands are not mutually exclusive but residents have limited control over some aspects of prevention, eg packaging whereas they can buy less food or reduce junk mail.

It would seem that the priority areas chosen are aimed at reducing tonnage and removing biodegradable material from the waste stream.

We have to be realistic and target our efforts where we can achieve most in terms of the environment and cost effectiveness.

It would be more meaningful to residents if they could see clearly, how, as individuals, they could help to achieve this target. Perhaps, we need to say something simple to everyone, such as: -

'We want to reduce the amount of waste we collect by 15,000 tonnes by the end of 2014. We can do this if every household reduces the amount they put out for recycling or landfill by xxxx kgs in a year'.

The introduction of food waste collections in a growing number of our boroughs and districts, supported by the county council, shows that what was until recently regarded as 'waste' has now become a 'resource'.

The indications are that the introduction of food waste collections concentrates the minds of some people on the amount of food, and therefore, money, that they are wasting. However, people's lifestyles in Surrey, and the fact that they cannot see the direct disposal cost, either in terms of money, or to the environment, of over consumption, may militate against mass behaviour change. However, we should persevere and support the WRAP initiative.

Although it has been promoted previously, we believe there is further scope to increase home composting. This could result in a meaningful reduction in arisings. Both garden/vegetable waste composters and 'Green Cones' should be available at subsidised rates and we need an imaginative campaign to enthuse the gardeners of Surrey. The charges made for green waste collection should be reviewed regularly.

It is disappointing that the consultation paper reports that a large proportion of heavy, bulky items, such as furniture and white goods are going to landfill. It would seem that despite information on various websites in the county, residents still have difficulty in disposing of large household items to charities and others who could make use of them. People may be apathetic - regarding it as too much trouble to ring around charities or even to ring the council. When a resident asks their council to arrange collection of unwanted items are they steered in the direction of organisations who might want their cast-offs or to websites like 'Freecycle'? Do existing safety regulations mean it is easier to dump items in landfill than refurbish and reuse them – in these cases what can be done to ensure safe reuse? In tonnage terms this would seem to offer benefits.

The consultation paper contains no data on the success of reusable nappy schemes previously promoted in Surrey and elsewhere. Promotions with partners such as the National Childbirth Trust, (NCT) would seem likely to achieve the most success. Perhaps we should also be looking at involving midwives and maternity unit staff.

In the consultation paper the tonnage of unaddressed direct marketing mail is estimated as being roughly double that of addressed mail. The addressed mail can be reduced considerably if everyone is encouraged to sign up to the Mailing Preference Service, (MPS). We are sure that many residents would like to be able to control and reduce the unaddressed mail flowing through their letterboxes but this is much harder to tackle.

Reductions in packaging or changes in the type of material used for packaging are not covered by this question. We note that the SWP intends to lobby government on the issue of packaging waste. We urge them to pursue the introduction of measures that will incentivise the use of more recyclable or compostable packaging and to increase producer responsibility.

We welcome the importance placed upon working with schools in the consultation paper.

Question 3. Waste Collection

This question refers to Section 3.4 'Waste Collection, Recycling and Composting; sub section District Collection Schemes' in the consultation document.

Currently all 11 waste collection authorities (district and borough councils) in Surrey collect waste for recycling separately from residual waste, but some collect more material than others. It is clear from consultation with the public that there is an increased desire for local authorities to collect a wider range of recyclable materials; however, adding materials to the collection scheme requires additional resources and operational changes.

Q3.Which THREE of the following materials would you like your council to prioritise for separate collection in addition to the materials they already collect?

- Glass
- Plastic bottles
- Mixed plastics (eg yoghurt pots)
- Card
- Drinks cartons
- Other plastics
- Metals, tins
- Food Waste

Guildford Borough Council has a very comprehensive collection service. One box for all types of paper including newspapers, magazines, junk mail, directories & catalogues, office & printer paper and card. One box for glass

bottles & jars, tins, cans, empty aerosols, batteries and plastic bottles (no food trays, yogurt pots or margarine tubs).

In order to maximize recycling and make it easy for residents we must ensure that the planning process reflects the need for this activity to be carried out, provision of space for bins, recycling containers etc.

When looking at the collection of recyclables there are various factors to consider, such as: -

- benefit to the environment (locally and with a whole life cycle approach)
- commercial markets
- cost effectiveness and efficiency of collection (including transport, special vehicles, numbers of staff needed)
- legislative drivers (eg landfill tax and Landfill Directive obligations and the implementation of the WFD)
- likelihood of public participation

Priority should be given to the collection of food waste across the county. This will benefit the environment, help us to achieve our 70% recycling/composting target and contribute to meeting our landfill obligations.

All WCA's should be collecting glass, paper, tins and plastic bottles as a minimum. This is in line with the Waste Framework Directive, which requires these items to be separately collected by 2015.

The WFD calls for the collection of 'plastic' in general but this is problematic at the moment. The public are confused by the many different forms of the material they encounter and recycling /reprocessing facilities are limited in this country. It is environmentally unsound to create toxins by burning this material, which comes from a finite resource. Encouragingly, we note that proposals at the Eco Park include *'finding new ways of dealing with wastes that are currently difficult to recycle or reuse, for example compact discs or plastic packaging'*. This sort of activity should be promoted at CRC's where space allows.

Some difficult items, eg Tetra packs, or small volume items, such as clean aluminium foil, can probably best be collected at CRC's or at bring-banks. We note that at Slyfield CRC plastic bottle tops are now being collected. Supermarkets and other large retailers should continue to be encouraged to provide recycling facilities for products they sell, eg batteries, printer cartridges, water filters etc.

We must make it our aim to offer markets good quality recyclate and we believe that kerbside source separation is the best way to achieve this.

In their report 'Choosing the right recycling collection system' (June 2009), the Waste and Resources Action Programme, (WRAP), emphasised the benefits of closed loop recycling, *'where materials are put back into the same or equivalent application substituting for virgin materials. These benefits can only be achieved if the collection system delivers recyclates of sufficient quality'*.

WRAP conclude that *'kerbside sort systems offer reliable material quality and lower net costs for council taxpayers. They are also capable of capturing the same volume of material as co-mingled schemes'*.

WRAP found that even the best MRF's were unable to *'deliver the levels of quality achieved by kerbside sort systems'*.

WRAP also recommend two stream co-mingled collections in preference to single stream collections where kerbside sorting is impracticable.

Question 4. Dealing with residual waste

This question refers to Section 3.5 'Residual Waste Treatment' in the consultation document.

Residual waste is waste which cannot be recycled or composted. The new proposed policy acknowledges

that by reducing and recycling more we will have less residual waste to deal with. Therefore the proposed policy is to develop advanced thermal treatment (gasification) which is economically viable on a smaller scale than mass burn incineration.

'In a gasification facility, waste is heated in low levels of oxygen, to produce a gas which can then be used as a fuel in a similar way to natural gas. The low oxygen levels prevent the waste from catching fire during the heating process. The resultant gas can be used to heat water and create steam to drive a turbine and electrical generator, providing electricity to the National Grid.

Q4. To what extent do you agree with this revised policy?

We note that the county now expects to have to deal with only 160,000 tonnes of residual waste, rather than the 270,000 tonnes previously forecast. The revision of the forecast in such a short space of time, and the recognition in Policy 4, that recycling levels above 70% are achievable, shows that we need to be particularly careful not to tie ourselves to expensive and inflexible residual waste treatment methodologies.

We maintain our opposition to 'dirty' landfill and support the aim of the Landfill Directive to exclude damaging biodegradable material from holes in the ground. However, it is possible that landfilling waste that is either low in biodegradable content, (much food waste removed) or has been bio-stabilised is the best environmental and financial choice.

Not all landfill is bad and setting a target of 0% to landfill by 2014 would seem to limit our options. Does this target actually only apply to landfill that would attract the 'active' rate of tax? Presumably the bottom ash produced by gasification is not counted as it is taxed at the lower rate – or else it is planned to send it elsewhere, as with the fly ash?

GAIN continues to support the bio-stabilisation of our residual waste followed by landfilling. Mechanical, Biological Treatment, (MBT), with bio-stabilisation comes out well in the 'Information on Technologies' paper; particularly as regards coping with a wide range of waste types, flexibility and modularity. In biological treatment the waste generates its own heat as part of the breakdown process.

We should press for a revision to the landfill tax rate to a level that recognises that bio-stabilised waste, or that containing lower levels of biodegradables than the 68% assumed, (with the exact % to be decided) can be a viable financial option and a reward for increased recycling/composting.

Landfill is not included in the technology comparison. In their 2008 paper "Biostabilisation' of Wastes: Making the Case for a Differential Rate of Landfill Tax', Eunomia demonstrate that landfilling stabilised waste is better in climate change terms than burning it. Although, in this regard, gasification is claimed to offer improvement over mass burn, the evidence base still shows the landfilling of bio-stabilised residues to be the preferable option.

In 'World Class Waste Solutions', (WCWS), as presented to the Cabinet in February, remaining landfill in Surrey is said to be 'limited'. This has been stated previously but has not been satisfactorily substantiated. With the Minerals Plan still in gestation we have no view of the void space that will, or may, become available in the next 10 to 15 years.

As previously stated, and long maintained, our preferred residual treatment option is to landfill after biostabilisation. We are concerned about a gasification policy for the following reasons: -

- It is a thermal treatment process, which, like mass burn incineration, produces both bottom ash and 'fly ash' (Air Pollution Control Residue).
- The 'fly ash' (stated in the consultation document as being 3% of tonnage input has to be disposed of as hazardous waste.

- We have no hazardous waste sites in Surrey, or we believe in the South East. It is likely that this material would be trucked to an unfortunate community in Gloucestershire.
- The consultation paper comparing technologies fails to identify ‘emissions to air’ or ‘emissions to water’ as issues to be addressed. The ‘carbon footprint’ comparison is only made with mass burn incineration. In general, the comparison of the environmental aspects of the technologies is inadequate.
- In the WCWS document, Annex 3 para 17 it is stated: - *‘Previously gasification technology has not been considered appropriate as more residual capacity was required and gasification technologies were not assessed as robust. However two factors enable the technology to now be proposed’*. These factors are stated to be *‘Due to the reduction in waste volumes and a large increase in recycling it is now a technology that can be considered’*. And the specific technology proposed (Planet Advantage Technology, developed by Ascot Environmental) *overcomes traditional technical weaknesses by operating a front-end batch-feed process’*. Our understanding is that this technology cannot yet be demonstrated to be ‘robust’ for the treatment of mixed waste.
- Gasification is far from a proven technology with a number of variants being marketed. A Juniper report stated *“The lack of relevant track record means that the robustness of guarantees given on factors that may include process availability, maintenance costs and energy output, all of which are necessary to underpin financial models and contract terms, are often called into question in technical due diligence.”*
- There are technical issues around what is input, (feedstock) and its effect on performance. We note from the technology paper that gasification systems ideally need high calorific waste. Our waste ‘mix’ will continue to change and, hopefully, much more of the high calorific value, (CV) plastic will be recycled in the future.
- Where there are so many uncertainties there is also financial risk. We note that in the WCWS document the comment is made that banks are unlikely to provide lending for this technology *‘as there is not a history of effective operation, and commissioning tests to ensure effective performance and management of risks will be required’*. We further note the funding guarantees given by SITA’s parent Suez and that *‘Detailed negotiations with SITA have commenced to manage the risks associated with operating the plant, and to provide commercial and operational contingency plans in the event of unacceptable performance levels’*.
- The financial assessment of WCWS is regarded as confidential and cannot be scrutinised by council taxpayers, it is impossible to scrutinise the costs of gasification against other options.

Question 5. Other comments

Q5. Do you have any further comments on any part of the strategy?

With the old Joint Municipal Waste Management Strategy, (JMWMS), we knew that the intention was to build two mass burn incinerators, and we knew their proposed locations.

We welcome the huge change of direction the county is making towards high recycling/composting, improving CRC’s and treating food waste with AD.

We understand that this is an evolving situation and that premature statements can be unwise but the consultation document contains little information on where significant new facilities might be sited – information which many people would like to see. In the past, residents have clearly expressed a preference for smaller, localised facilities.

The only definite proposals would seem to relate to the large facilities envisaged at Charlton Lane, but we note the possibility that two more gasifiers may be built in the county.

We know that there are in-vessel composting, (IVC) proposals at Wisley and Runfold, how do these fit in with the revised plan? Locally, to us in Guildford, the Slyfield Regeneration Project has yet to reach the public consultation stage.

Wherever new, changed or expanded waste facilities are proposed their siting and nature must be the subject of proper consultation, the normal planning process and any additional environmental safeguarding procedures appropriate to the type of development.

We understand that following the demise of the South East Regional Assembly, (SEERA), the regional waste strategy has been scrapped. In their report of September 2008, 'Well disposed', the Audit Commission report, (September 2008), suggests that there are benefits from Waste Disposal Authorities, (WDA's), '*working in partnership with their neighbours on operational aspects of waste disposal*' – we would be interested to know whether this is likely to inform the new governments thinking or that locally?

With the change of government there would seem to be general uncertainty regarding targets and monitoring. Many of the core targets in the waste field would seem to be useful and informative both to the professionals involved in making things happen and to the wider public - who want to see progress towards ever more sustainable waste management.

We regard this 'new' waste strategy as being a huge improvement on anything that we have seen before and we are supportive of much that is proposed. Our major concerns lie with the choice of gasification treatment for residuals and the lack of clarity in respect of the disposition and size of the various facilities that will be required.

GLOSSARY

AD	Anaerobic Digestion
CRC	Community Recycling Centre
CV	Calorific Value
IVC	In-vessel Composting
JMWMS	Joint Municipal Waste Management Strategy
MBT	Mechanical Biological Treatment
MPS	Mailing Preference Service
NCT	National Childbirth Trust
SEERA	South East England Regional Assembly
SWP	Surrey Waste Partnership
WCA	Waste Collection Authority
WCWS	World Class Waste Solutions
WDA	Waste Disposal Authority
WFD	Waste Framework Directive