

Waste Minimisation 2015

Introduction

This is a response on behalf of Reading Friends of the Earth (FoE) to the consultation - running from January to February 2015 - on Reading Borough Council's proposed Waste Minimisation Strategy.

We welcome the Council's initiative to improve performance in this area. We offer some detailed comments and suggestions below.

'Minimisation' is open to a range of interpretations – we want the Council to succeed in:

- reducing the amount of waste generated locally;
- reducing the environmental impact of the management of that waste;
- playing its part in moves towards a 'circular economy'.

Summary of Response:

- 1) Campaigning should consider how to decrease deprivation-related variation in recycling
- 2) EU best practice should be considered in planning a waste minimisation strategy
- 3) Anaerobic Digestion should be considered along with segregated food waste collection in order to divert organics from landfill/incineration
- 4) Food waste recycling review should have been completed and considered before purchase of a new fleet of refuse trucks – actions should be considered to review the decision and assess potential for order modification

Education and campaigning to decrease food waste arisings by affecting behaviour also requires assessing best practice elsewhere. According to Friends of the Earth document "Maximising Recycling Rates: tackling residuals"

http://www.foe.co.uk/sites/default/files/downloads/maximising_recycling_rates.pdf , evidence suggests that campaigning to increase recycling and composting should focus on reducing the deprivation-related variation in recycling. Any improvement is only likely to be achieved with improved understanding of why some households do not recycle as much as other households.

In the EU, Flanders may be considered in the discussion on best practice for dealing with waste arisings. In 2009, 65% of its biodegradable municipal waste was diverted from landfill through source segregation and supportive policies such as regulating quality thresholds on selective collection. Other European supportive policies to increase waste capture for landfill diversion are, amongst others: packaging taxes, extension of waste taxes to incineration, and residual waste levy above per capita quota.

Waste minimisation should particularly take into account two key objectives (3 and 10) of the RE3 Joint Waste Strategy (JWS). These are to maximise the opportunity to recycle and compost as many materials as possible, and to ensure that sustainability and efficiency are considered in all aspects of waste management which should minimise the carbon footprint of waste operations.

The prospective Reading Borough Council (RBC) Waste Minimisation Strategy 2015-2020 (WMS2020) requires more accountability with regard to these two key objectives.

In particular, the access to low cost contracts for landfill space and waste diversion via incineration are not secured beyond the existing RE3 contract. The consequences should be considered in the existing time period, while actions can be taken to improve RBC inherent sustainability. Sustainability for RBC should be considered in a context where it can depend less on contracts with private external parties while still serving objectives 3 and 10 of the current JWS.

This context serves as the grounds to strongly consider establishment of anaerobic digestion (AD) to divert food waste from landfill/incineration. AD could yield between 2-18GWh/yr of electricity and high quality fertiliser. A small scale pilot project could potentially access funding via WRAP. A pilot study would be useful to assess the level of potential household participation for a suitable focus area.

Objectives and Aims

We note the proposed Objectives are:

Objective 1. To increase recycling and re-use rates.

Objective 2. To minimise the amount of waste sent to landfill.

Objective 3. To increase understanding and engagement in waste & recycling for the local community and key stakeholders.

Objective 4. To ensure effective, efficient value for money service delivery.

We suggest that a prime Objective should be to help residents and commercial organisations to reduce waste production.

We suggest that Objective 1 should reference the 'circular economy' concept – the benefit of extracting useful materials from the waste stream to reduce the demand for natural resources.

We suggest that Objective 2 should refer to reducing the environmental impact of waste management – in particular the impact on climate change – rather than focussing simply on reducing waste to landfill. The benefit of reducing the cost to residents of the Landfill Tax by reducing waste to landfill comes under Objective 4.

We would like to see the adoption of quantified targets and timescales for these Objectives. 'Minimise' does not have a precise and useful meaning.

We would like to see an objective to reduce packaging by actively seeking to identify and pursue suppliers – local and national – who are not achieving best practice in line with the Packaging (Essential Requirements) Regulations.

We suggest the Council should carry out and publish a waste audit of its own activities – both to improve its own performance and to be an example to other organisations.

We would like to see the concept of 'producer responsibility' for funding end of life treatment of materials extended and strengthened.

Evidence-based Priorities for Action

The Strategy and Action Plan documents list many sensible-seeming ideas for actions. But there is little or no quantitative analysis to guide priorities for effort and expenditure to achieve cost-effective improvement towards the 42% recycling rate by 2017 target referenced in Section 6.4 – or even to show that it is feasible. We wonder if this information is in some other document.

Understanding Opportunities:

As acknowledged in Section 6.2 it would be useful to understand what quantities and types of recyclable materials, and of other materials, are estimated to be contained in each waste stream - perhaps broken down by source areas. Section 3.4 comments that a large amount of waste is found in residual bins that could be recycled or composted but this statement is not quantified. This information would be a basis on which to investigate markets for materials or waste streams that are not currently recycled – perhaps leading to changes in collection or sorting processes.

'Contraries':

Section 3.3 'Recyclate Contamination' calls for action to reduce the impact of 'contraries', which we support in principle, but it would be good to have details of the scale of the problem, the costs it imposes at present, and analysis of the different types of unwanted material. If materials and items – such as Tetra-Paks and/or additional types of plastic packaging - are potentially recyclable or re-usable, is it better to prevent their inclusion in recyclate collections or to broaden the categories of material that can usefully be separated at the MRF?

Climate Change:

Sections 3.6 'Landfill' and 3.7 'Climate Change' rightly point out the importance of reducing methane emissions, and the benefits of reducing the carbon footprint of materials by recycling.

It is important to reduce the amount of biodegradable material going to landfill to control long-term emissions of methane, a potent greenhouse gas. While some may be captured from landfill and burned to release carbon dioxide (a much less-potent greenhouse gas per carbon atom) some will escape from landfill over the years.

It would be good to see estimates of the climate change impacts of Reading's current waste management practices to allow opportunities to be identified, and to quantify improvement.

While it may well be possible for Reading to comply with the Landfill Directive (national) target of reducing biodegradable waste to landfill to 35% of 1995 levels by sending much residual waste to incineration we would like to see analysis to confirm this, and proposals to reduce this further. Is the problem food waste or other biodegradable materials? Do some rounds or wards produce more food waste than others?

It is not clear what alternatives residents have for disposal of food waste other than the residual waste bin.

We would like to see analysis of the climate-change related costs and benefits of sending residual waste to Colnbrook – including transportation costs - so that this can be compared with alternative disposal and energy-recovery methods.

Actions

Biodegradable Materials:

The best option is always to create less waste. The next best is probably to deal with it locally by techniques such as composting, wormeries, and green cones, as identified in Action 2c.

However these techniques may not be effective everywhere so we strongly support the proposal (Action 2c.) to review options for increasing food waste recycling, possibly by kerbside collection. While adoption must be supported by environmental and financial analysis – including carbon footprints of vehicles and their use - we would be pleased to see a pilot project undertaken soon – ideally targeted on rounds which produce a lot of food waste.

It seems likely that South Oxfordshire and other authorities could supply useful information on capital and running costs and methane production.

One possibility would be to ask South Oxfordshire to extend its food waste collection into parts of Caversham – presumably residual waste from the chosen area could then be landfilled with the expectation of reduced levels of methane generation.

Another option would be to establish an Anaerobic Digestion facility close to central Reading (or use Thames Water's, or Oxfordshire's) and arrange for it to take biodegradable material from key commercial sources – such as restaurants, hotels and canteens. An Agrivert representative has told Reading Friends of the Earth that, although they are currently running at capacity, they would be willing to free up capacity for 15,000 tonnes per annum at their Oxfordshire facility.

The proposed replacement of the waste collection vehicle fleet (Section 3.7) could be used to equip with trucks capable of separate collection of food waste with recyclables or residual waste if the vehicle specification is still open to change. Reading's alternate weekly collection regime for recyclables and residual waste would then allow a weekly food waste collection. The planned review during 2015 on how to improve food waste recycling should have been carried out before the purchase of a new fleet of fuel-efficient refuse trucks. The initial cost barrier for food waste diversion from landfill could have been reduced making co-collection a more attractive infrastructure investment. The decision to purchase vehicles without having considered food waste collection should be reviewed and options to modify the order before receipt of the vehicles should be considered.

Home composting and 'Green Cones' etc. are important, but a large study by WRAP in 2012 <http://www.wrap.org.uk/content/household-food-and-drink-waste-uk-2012> found that amongst 82 UK local authorities having collected segregated food waste, 175kg/hh of food waste was generated. From the total amount, 20kg/hh was diverted from landfill via segregated collection, of which 54% of the total food waste was not classified as home compostable and 37.6% was classified as unavoidable. On this basis households in Reading

without access to a garden will not be able to divert an estimated 66kg of annual food waste from landfill unless there is a provision to collect it.

Though some of this currently may be diverted by incineration, the government AD strategy https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69400/anaerobic-digestion-strat-action-plan.pdf says:

- “The most environmentally preferable treatment options for food waste are usually AD or composting.” - We hope this will be fully reflected in the relative financial costs before the end of the prospective WMS2020.
- Page 6 paragraph 23: AD of segregated food waste collection counts toward recycling targets under "certain circumstances" which places it higher on the waste hierarchy than EfW which is merely classified as Energy Recovery.
- Page 10 paragraph 40: AD is the best option for processing food waste, though prevention is obviously preferred.
- Paragraph 42: AD for food waste is generally preferable to composting (due to cumulative benefits of biogas and digestate) and that food waste must be collected separately at source to feed to AD.
- Page 14 paragraph 60: the Government is committed to facilitating biomethane injection into the national gas grid and the use of biomethane as a transport fuel.
- Page 20 paragraph 89: public bodies are required to regard the guidance on AD when fulfilling their duties in relation to the waste hierarchy.

The WRAP gates fees report:

http://www.wrap.org.uk/sites/files/wrap/Gate_Fees_Report_2013_h%20%282%29.pdf indicates the typical gate fee for EfW is higher than for AD.

Suggestions on pursuing AD have been raised in the RE3 stakeholders board meetings and there has been no observed progress. RBC must lead actions to develop AD if it is to be realised.

Tetra-Paks:

Tetra-Paks are an environmental nightmare because their complex construction makes them difficult to recycle, but they have widespread consumer acceptance and utility, and arguably offer lower environmental costs of transportation for liquid foodstuffs than some other types of container.

At present there are 5 ‘bring’ locations for Tetra-Paks in Reading. Is there any information on how successful they are, and at what environmental cost?

While they continue in use would it be better to accept Tetra-Paks in recyclable collections and separate them in the MRF for return to the manufacturer rather than having them appear as ‘contraries’?

Plastics etc.:

Investigate options to recycle additional types of plastic material, or accept additional materials or ‘product groups’ for separated recovery at the MRF, to reduce environmental impact.

For example:

- Sainsbury's take a wider variety of plastic materials for recycling than the Council – recycled via 'Palm Recycling' <http://www.palmrecycling.co.uk/>
- Switzerland recycles PET and separates other plastic for incineration – this report <http://www.plasticgarbageproject.org/en/plastic-garbage/solutions/recycling/raymond-schelker-rethinking-how-we-deal-with-plastic/> suggests it is better to burn plastics as fuel in cement kilns rather than to incinerate for electricity generation, This could be a good use for Municipal Solid Waste after removing recyclate and sorting in a trommel - if there is a market demand.

Batteries and WEEE:

It is good that the Council already collects batteries (Section 6.1.2) and proposes to collect WEEE (Action Plan 4d. and 4h.) but it would be useful also to give publicity to the collection points for batteries and WEEE that many retailers are already required to provide under the relevant regulations. Batteries are extremely portable and it is important to keep them out of the general waste stream.

Stakeholder Involvement:

The re3 Stakeholder meetings seem to be poorly attended, other than by Councillors and Officers. Could all or some meetings be held at a time which better suits people that are employed in order to capture a better representation of public groups and members of society?

Action Plan Document:

Lots of good ideas – all seem worthy but hard to tell how to allocate resources between them without analysis discussed above. Comments on selected items:

1b. Incentive Scheme: Reading FoE's John Booth has talked to 'Reward Your World' – their scheme would require funding. Difficulty is measuring degree of 'good' behaviour to be rewarded. Should rewards be given to people who recycle anyway – to show society's gratitude – or should you insist on a cost/benefit analysis to show significantly increased recycling as a result of the scheme?

2a. Cutting junk mail would be a boon to society. Can the originators be made to pay for collection and disposal?

2b. Community Groups: Taking information to community groups and encouraging them to participate in waste reduction and re-use seems a particularly valuable activity. When considering and reviewing its waste minimisation actions, the Council should consider the use of community groups to support the WMROs in delivering the message. It could convene a meeting with local supermarkets/large business areas to encourage them to put up posters and to offer roadshow-type space in their entry areas to support waste reduction. Council could then deliver this through a mixture of their own employees and community groups.

Some potential themes could be:

- Explaining the difference between best before and use by dates on food packaging
- Delivering the love food hate waste message, with particular emphasis on storage
- What are contraries in the recycle, and why is it important to reduce this
- Promoting repair café and activities to reuse goods.

2c. Food and Compostable Waste: This proposes that Green Cones and home composting and home food digestion be considered with options for food waste recycling, possibly by kerbside collection. This objective is currently ranked as medium importance, however this objective should be highly ranked.

2j. Tetra-Pak: as discussed above need analysis as to whether more bring banks is best way forward.

4d. and 4h. Collection of WEEE would be welcome. Producer responsibility for end-of-life treatment is in place.

Actions from GREN/RNN Meeting:

The GREN/RNN meeting 'Better Recycling and Less Waste' in October 2014 produced the following suggested actions:

- There were opportunities to improve recycling from transient population and from people with poor command of English. Neighbourhood groups and/or RBC street team could benefit from accessible information (leaflets, internet?) in a variety of languages and/or pictorial communication.
- Wood re-use should be encouraged (although some wood taken to Smallmead is already recovered for making board).
- Community composting should be investigated (although there is composting of green waste collected from Reading residences already).
- Building control could seek to improve waste management/collection facilities in new-build estates.
- Should consider community engagement – perhaps a 'user panel' – to evaluate actions and communications – at the design stage and as follow-up.
- Reading's Repair Café was launched in October 2013 and was being run monthly – now at Jackson's Corner - by Transition Town Reading and Hackspace.
- Pavement collection days – people in a particular area put their unwanted stuff out for anyone to take, and the next day the Council collect what's left - once a month or once a year – this was done in several countries on the continent.
- Community groups could arrange WEEE collections – but there was thought to be a decline in local repair facilities.
- GREN and Transition Town Reading were collaborating to prepare a web-directory of opportunities to give away and acquire second-hand furniture. (February 2015 - drafted – in checking and approval).

Legislation and Definition of Terms

Section 3.2 of the Strategy emphasises the importance of tracking legislative changes but the document “WMS_Appendix_4_Legislation” appears to date from around 2007. The Council should present an up-to-date register of legislation to support its strategy.

In particular we note:

- “Proposed” EU Directive on Batteries and Accumulators – this is now in force – see <https://www.gov.uk/battery-waste-supplier-reponsibilities>
- Landfill tax “A standard rate (currently of £24/tonne for 2007/08)” – the standard rate for 2015/16 will be £82.60 per tonne
- Packaging (Essential Requirements) Regulations 2003 is not covered.

The use of technical terms in the Strategy is to some extent inconsistent and confusing – for example ‘average recovery rate’ is not defined, and we think the target of 42% recycling rate by 2017 is based on a new definition of “recycling” which includes recovery and minimisation – but on Page 10 the table shows ‘recycling’ (24%) and ‘composting’ (11%) separately. These evolving definitions could be explained better – perhaps with reference to the Waste Hierarchy diagram.

Section 6.3 rightly says that the ‘recycling’ target in the Waste Framework Directive applies to the UK but does not say that it does not apply to Reading as an individual authority. It also does not mention that Article 9 of this Directive requires the setting of a range of waste reduction targets and action plans across the EU by the end of 2014 (awaited) and that there are two proposed targets for food waste one set in 2011 for edible food waste reduction of 50% by 2020, and the other from the EU parliament in 2012 for halving food waste by 2025.

Action is needed to monitor emerging legislation, actions and pilot projects across the EU and UK.

John Booth for Reading Friends of the Earth.

john@booths.clara.net

20th February 2015.