

Circular economy strategy

Building on our recycling record

Q1: Are the suggested actions the best way to help us recycle more?

Broadly yes.

But....

We would like to see a target for zero waste by 2030 not 2050

Whilst many of the proposals in this document are ones that we support and welcome, one key area of divergence for us is the proposed timescale of this plan, namely aiming to achieve zero waste by 2050.

In 2018, UN Intergovernmental Panel on Climate Change (IPCC) released its landmark report saying that we had only a dozen years for global warming to be kept to a maximum of 1.5C, beyond which even half a degree will significantly worsen the risks of drought, floods, extreme heat and poverty for hundreds of millions of people. We are now 2 years on from that report, so we now have a decade at most to take action to try to keep global heating to 1.5C rather than 2C.

Wales has already shown that swift progress on recycling and food waste collections is possible with the necessary political will and correct political levers. This gives us a successful blueprint to follow as we scale up actions but we need to have an ambitious time frame target to ensure that we not only reduce resource use and climate emissions but also that we harness the public's' enthusiasm to act on these issues.

It is therefore imperative, absolutely imperative, that we act with this 2030 timescale in mind and that our target for becoming a zero waste nation reflects that and we set ourselves the goal of 2030 rather than 2050.

Q2: Should recycling arrangements across Wales be consistent?

Yes, absolutely, as this would give far greater clarity for populations around Wales, whether they live in urban or more rural areas and in different types of properties as to what and how materials are collected and recycled. Currently, the mix between co-mingled and kerbside sorting systems in different council areas can lead to confusion and a difference in recycling rates and in contamination rates.

Information provision

There is an associated issue and solution with this too. There is still a lack of clarity across the board in terms of what exactly can be recycled, where and how it needs to be presented for recycling (eg if a plastic bottle should be rinsed out first or if a pizza box with some food residue can be recycled).

There is also a lack of clarity where different pieces of information are to be found.

It would help to vastly simplify the situation if there was one portal or hub of information in Wales where all of this waste, recycling, composting, re-using, upcycling etc etc information could be found.

At the moment, if you want to know how to set up a Repair Café you need to go to one website, if you want to know where to recycle a mattress you need to go somewhere else, if you want information on how to compost you need to go elsewhere.

The creation of a 'one stop shop' should be one of the easier 'fixes' and would immeasurably help the delivery of information, both for the present but also going forwards.

Q3: Are the suggested actions in this theme (Building on our recycling record) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

We would like to see the Welsh Government support and introduce a Sustainable Baby Box/ Bundle.

An estimated 200 million nappies are used in Wales each year and they make up 10% of black bag waste. If all these stinking nappies end up in landfill, it would result in 26343.52 tons of waste, costing councils around £2.4million in landfill tax.

To help solve the nappy problem, we need to reduce the demand for disposable nappies by making it easy and economical for parents to make the switch to cloth nappies.

We would like to see a gift of a baby box or bundle for each new parent in Wales. The box would include locally sourced Welsh products including reusable nappies.

The aim of the sustainable baby box or bundle is to boost the uptake of reusable nappies, thereby helping to reduce the demand for disposable ones. Hopefully parents would buy fewer disposable nappies, so a far lower number of them would go to landfill or incineration, saving councils money and reducing the carbon emissions associated with producing and wasting these nappies.

In 2015 there were 33,217 babies born in Wales, which means a sustainable baby box would cost around £3.8 million a year. This would be in line with First Minister Mark Drakeford's original estimate of £3-5 million for a more conventional baby box.

Single use nappies are a huge waste problem in Wales and elsewhere. A sustainable baby box has the potential to eliminate a large proportion of this waste and to save parents, local authorities and Welsh Government money, ensuring a cleaner, more sustainable environment for future generations. It could also boost the Welsh economy and provide green jobs if materials for the Baby Box were sourced in Wales from Welsh companies and if the Welsh Government helped new local nappy laundering schemes to start up around the country to help those families who don't have washing and drying facilities in their homes. These local laundering schemes would provide local jobs and would help break down one of the potential 'barriers' to people using reusable nappies (if they would struggle to launder and dry them at home).

Universal recycling collections

It has been brought to our attention that churches for example, due to not having to pay Council Tax, don't therefore receive recycling collections. As we move towards wanting to achieve zero waste, this situation needs to be addressed. It is hopefully one of the easier issues to solve and we hope that churches, other faith institutions and all other places that currently fall into this category of not having their recycling collected will become a priority.

Supporting prevention and re-use

Q4: What actions could we take to further promote the work on prevention and re-use that occur in our communities?

We welcome the initiative to focus on reusing timber in communities and would like to see this focus also applied to other products such as paint. Community RePaint (<https://communityrepaint.org.uk/the-uks-paint-reuse-network/>) estimates that 50 million litres of the 320 million litres of paint sold in the UK each year go to waste. The environmental and social benefits of working to set up a nationwide scheme which covers timber, paint and other products such as these are obvious.

Q5: Do you agree we should develop and expand the work we do in schools on waste prevention and re-use?

Yes. We would like to see this include all materials such as paper usage and textiles too.

Q6: What do you think are the key steps that we need to take to further reduce avoidable food waste?

According to the Food and Agriculture Organisation of the United Nations, roughly one third of global food production gets wasted. If all of the UK's household food and drink waste could be prevented it would have the benefit equivalent to taking one in four cars off the road.

In addition, the U.N. Environment Programme (UNEP) estimates that global food production accounts for 70 percent of fresh water use and 80 percent of deforestation.

WRAP has found that 70% of UK food waste is generated from people's homes.

Clearly a lot of good work has already been done to reduce food waste in Wales and the universal food collection scheme in Wales has clearly been a success.

FareShare Cymru (<https://www.fareshare.cymru/en/>) do fantastic work and we would support current initiatives, the further use of technology (<https://digitalagenda.io/insight/innovative-technologies-food-waste/>), the move to more food and beverage refills in shops and supermarkets, food technology teaching in schools encompassing food waste and the formation of the new Zero Waste Towns initiative which in turn can play a role in helping to reach out to people in all parts of Wales on issues such as food waste too through initiatives such as local workshops (<https://www.lovefoodhatewaste.com/article/welsh-families-tackle-waste>) , working with other community groups, creation of zero waste cafes, refill schemes, community fridges etc.

The charity Feedback has some interesting ideas on reducing food waste.

<https://feedbackglobal.org/campaigns/#food-waste>

Q7: Are the suggested actions in this theme (Supporting prevention and re-use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

In line with the waste hierarchy, prevention and reuse needs to be the top priority!

Cross Departmental solutions

We would advocate that the Welsh Government adopts a similar approach to its cross departmental Decarbonisation Plan. If we are to truly achieve the changes we want to see, then all WG departments will need to look at their own areas of responsibility and come up with plans for how they can play their parts too. This can't just be something that the Circular Economy department looks at or has sole responsibility for.

The tourism sector for example has its own Green Key awards (<https://greenkey.org.uk/green-key-sites.html>) with around 50 accredited sites in Wales. There is obviously scope for this to vastly increase and with tourism playing a more significant role in the Welsh economy than it does elsewhere in the UK and having a 'total contribution, including impacts through the supply chain and capital investment, amounts to some £6.2 billion or 13.3% of the total economy. The direct contribution is £2.7 billion or 8% of the economy. 170,000 people are in employment generated by the industry, 12.7% of the workforce.'

<http://senedd.assembly.wales/documents/s500003159/AAB%2012%20Wales%20Tourism%20Alliance.pdf>

This sector for example, has the capacity to vastly improve its resource and material use through looking at procurement, supply chains, customer facing products and services etc. Even simple solutions such as hotels offering guests 'in-room recycling bins' aren't currently widespread.

The solutions in this sector will become very visible for tourists to Wales and will help us project a modern, forward thinking, green image to people everywhere.

We will ensure that public sector construction projects produce less waste during construction, during any change of use and at the end of the project.....

We welcome this and would advocate that this is extended to the private sector construction industry too, via legislation if necessary.

Driving innovation and materials use

Q8: Are the materials we have listed ones we should focus attention on?

We would like to see incineration and time frame targets included in this statement ...

'We will create a pathway which will see Wales become the first country to send zero plastic to landfill with an ambitious strategy to prevent plastic from entering our natural environment, including game-changing reforms ranging from support for innovation through to the use of legislation.

We would also like to see timescales given for these various commitments, eg 'We will significantly reduce unnecessary single use plastic items on our way to phasing these out completely'.

'We will reduce the export of our plastic waste and eliminate plastic litter from our natural environment. ' – we would like to see this become a firm commitment to stop exporting plastic and other waste with an associated time frame target.

The final Beyond Recycling strategy must include targets, timescales and measurables.

Wood-first construction

We welcome the focus on more sustainable construction methods and materials. With cement being responsible for an estimated 8% of worldwide CO2 emissions, it is vitally important we prioritise alternative materials during construction.

Existing alternatives and building carbon calculator do of course currently already exist

<https://www.buildingconstructiondesign.co.uk/news/carbon-sequestration-locking-up-carbon-and-unlocking-the-full-potential-of-timber/>

Q9: Are design changes in products using the materials listed an area to focus on?

Yes, and an interesting solution might be to create a new Annual Award

We would like to see the Welsh Government work with educational institutions, the private and public sectors and NGO's to institute a new Solving Waste Solutions (SWS) competition for people and businesses in Wales to come up with waste solutions. This could be an annual prize, funded by money raised by a new Latte Levy. The winner(s) would then work with universities and Welsh businesses on an accelerator scheme to bring these ideas to fruition. This would help stimulate not just interest in the issues and solutions, but also potentially help new 'start-ups' in Wales and maybe even provide wider solutions for other countries around the world.

Bangor University researchers are for example already investigating how grass, straw and maize stalks could provide alternatives to plastic packaging. <https://www.bbc.co.uk/news/uk-wales-50394607>

Q10: Are the suggested actions in this theme (Driving innovation and materials use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy? Are there other materials we could focus on and why?

An interesting alternative natural material with a wide variety of uses is Hemp

<https://www.edenproject.com/learn/for-everyone/plant-profiles/hemp>

'Hemp grows fast, is very adaptable to soil and climatic conditions and is undemanding on resources such as artificial fertilisers and pesticides. It provides a good break crop for the farmer, giving the land a rest from other crops and helping to prevent disease.'

It is also a source of growing interest for the construction industry in the form of Hempcrete

<https://www.ukhempcrete.com/services/better-than-zero-carbon-buildings/>

Due to its ability to grow quickly, its high thermal mass and its ability to lock away a net 110 – 160 kg of CO₂ per m³ of hempcrete.

Paper

Whilst the recent political, media and public focus has quite rightly been on reducing our use of plastic products, we now need to expand our gaze a bit and address the issue of our use of paper based products. It is estimated that every person in the UK is responsible, on average, for the cutting down of 4.5 trees every year just to fuel our paper needs.

Adopting a Latte Levy in Wales would significantly reduce the amount of single use cups we use thus reducing the amount of virgin paper used in their manufacture. There are many other ways we can cut down our paper use or switch to using 100% recycled paper instead whether that is in offices or at home.

A new Wales Paper Action Plan would probably be a world first, would help us address a so far largely ignored issue as well as fitting in with plans to plant more trees in Wales in response to the climate emergency. Planting trees whilst also reducing our impact on deforestation in other parts of the world are surely 2 sides of the same coin.

The Environmental Paper Network (<https://environmentalpaper.org/about/about-epr/>) have been doing a lot of good work over the years on this and would I'm sure welcome the opportunity to work with the Welsh Government and other stakeholders in Wales to draw up a national action plan to tackle our use of paper products.

Using Government levers

Q13: Are the suggested actions in this theme (Using Government levers) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Infrastructure

We would like to see Wales develop the infrastructure to deal with all of our recycled and 'waste' products within Wales. Not only would we then avoid sending materials overseas and exporting our problems to other countries, we would be able to support the creation of jobs in both the upstream and downstream supply chains in Wales.

EPR

We would support the introduction of EPR to cover the materials and sectors mentioned plus other sectors which we mention in our response.

We would also advocate that Wales introduces these EPRs unilaterally by 2023 if the UK Government and/or other UK administrations are reluctant to do so.

DRS

We would support the introduction of DRS to cover the materials mentioned.

We would also advocate that Wales introduces a DRS unilaterally by 2023 if the UK Government and/or other UK administrations are reluctant to do so.

Banning certain SUP items

We support the proposals to ban key SUP items in Wales and would advocate that this forms part of an ongoing scheme to establish which other SUPs can and should be banned in future as we move towards zero waste.

Polystyrene

We would also advocate for, and support, the banning of expanded polystyrene (and associated 'packing peanuts') products.

<https://www.recycleforwales.org.uk/what-to-do-with/polystyrene-0>

<https://edition.cnn.com/2019/07/01/business/new-york-styrofoam-ban-trnd/index.html>

Wet wipes

We would support the Welsh Government banning all wet wipes that don't comply with the new Fine to Flush standard (<https://www.water.org.uk/policy-topics/managing-sewage-and-drainage/fine-to-flush/>)

Latte Levy

We have been advocating for a 'Latte Levy' or charge on single use cups (hot drinks and soft drinks) in Wales (<https://www.foe.cymru/news/time-wales-perk-latte-levy>).

- Around 237 million single-use coffee cups and 183 million coffee cup lids are used each year in Wales
- 320 million other single-use cups are also consumed in Wales each year for drinks such as for smoothies, milkshakes, juices, etc.
- That's 557 million takeaway cups!
- And less than 1 in every 400 of these cups are actually being recycled.
- If we put these 557 million cups end to end (assuming each cup is 10cm in length), they would form a chain around 55,700 kilometres long - THAT'S ENOUGH TO WRAP AROUND THE ENTIRE EARTH WITH ROOM TO SPARE!

Eunomia, in their report for WG (<https://www.eunomia.co.uk/reports-tools/options-for-extended-producer-responsibility-in-wales/>), suggest a levy or charge of 25p per cup would likely bring in around £97million per year, at least in year1, after which hopefully less single use cups would be used and therefore less money brought in. This £97m would help fund a lot of the other measures that this consultation proposes as well as vastly reducing the amount of litter arising from these cups.

There is also an associated measure we can take immediately in Wales to address the issue of establishments only offering take away cups even to those customers wishing to consume the beverage on site rather than take it away. Using the existing Waste Hierarchy regulations in Wales, it's possible to stipulate that retailers have to provide the option of non single use beverage containers for customers who choose to consume the products on the premises.

We would like to see this being consulted on by the end of 2020 and with new legislation drawn up for a Wales Latte Levy within the period of this Assembly if possible or if time is too constrained, then immediately in the new Assembly after the 2021 elections.

Plastic bags charge in Wales

We note that WG has recently been reviewing the plastic bag charge and its exemptions in Wales. Whilst the huge reduction in plastic bag use in Wales following the charge has been a fantastic achievement, the recent findings that more and more people are using the 'Bags for life' as effectively a single use bag is worrying.

Increasing the charge for these Bags for Life in Wales would lead to a further reduction in plastic bag use.

The exemptions to the charge also need to be reviewed. We have been contacted by our supporters concerned that the pharmacy chain Rowlands for example, still continues to issue its prescriptions in single use plastic bags whereas their major competitors have moved to using paper bags. Indeed, Freedom of Information requests to major pharmacy chains in Wales show that Rowlands Pharmacy (<https://www.foe.cymru/news/pharmacies-wales-still-use-millions-plastic-bags>) issued 1,232,276 single use plastic prescription bags in Wales in 2017 and in the 3 years 2015-2017 issued a total of 3,644,280 of these bags. Exemptions such as this need to be reviewed and tightened as soon as possible.

We would advocate for a ban on all single use plastic bags in Wales.

Textiles

We recommend that the Welsh Government set up a new Textile and Clothing Taskforce group to help inform the process of how we best deal with clothing and textiles in Wales. The taskforce group could be made up of people and organisations in Wales who are already working in this sector. There are many opportunities for this type of joined up approach in helping reduce the contribution clothing and textiles make in our waste stream, including positive solutions such as school uniform swap schemes, clothes swap (swishing) events and action on plastic microfibre release from clothes.

We would also welcome the extension of the proposed new EPR to the fashion and textile industry. We

note that

...France introduced an EPR scheme for clothing in 2007 making clothing, linen and footwear companies responsible for the management of their end of life products. The scheme has nearly trebled clothing collection points from 15,621 in 2011 to nearly 42,000 by 2016 and collection rates have increased by more than 50%. In 2009, France was collecting 1.9 kg of discarded clothing, linen and footwear per person per year. By 2016 this had climbed to 3.2kg. Over 90% of the items collected are reused (59.4%) or recycled (31.8%) and 97% of retailers in France are legally compliant. The new sorting centres created by the scheme have provided 1,400 full time jobs, with 49% going to people facing employment difficulties.

(<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1952/report-files/195207.htm>)

Clamshell Packaging

Toys, tools and a multitude of other products, nowadays come sandwiched in very difficult to open Clamshell Packaging (<https://www.nationalgeographic.co.uk/environment-and-conservation/2019/07/common-plastic-packaging-recycling-nightmare>). It has been described as a recycling nightmare. It is ubiquitous and has come to personify SUP. The products inside this sort of packaging often don't need any packaging at all. This problem has to be dealt with. Wales should take the lead in imposing a charge on these products on sale in Wales or consider adding them to the list of banned SUP products.

Events in Wales

We welcome the desire to tackle the use of SUP cups in stadia in Wales and we would urge that this desire is extended to all events in Wales, from summer festivals and cultural events to regional fairs, from cycle races to long distance running events, so that these events are all working towards becoming zero waste too. This involves tackling not just the use of SUP cups and also the provision of things like bottled water at events but also the use of other materials such as virgin paper products in the advertising and running of events.

We would however advocate that Welsh Government go further than just 'consider' banning disposable cups in stadia in Wales and put in place a timeframe to ban them.

Cigarettes

The health effects of smoking are very well known. What is still maybe a little less known are the environmental effects of tobacco and cigarette butts.

According to a recent report (<https://www.independent.co.uk/environment/cost-cigarettes-rise-tobacco-industry-smoking-environment-who-climate-change-pollution-a8564796.html>), annual tobacco production results in almost 84 million tonnes of carbon dioxide-equivalent emissions - more than twice the emissions of the whole of Wales. Tobacco farms take up more than 20,000 square miles of land, use up more than 22 billion tonnes of water, and cause deforestation in Asia and Africa.

Cigarette butts are one of the most commonly found items of litter found in coastal and urban clean ups, some estimates suggest 30-40% of all litter. They contain cellulose acetate fibres and like other microplastics, have become a common contaminant found throughout the world's ecosystems, even accumulating at the bottom of the deep sea.

Used filters also contain thousands of chemicals that can kill plants, insects, rodents, fungus and other lifeforms.

<http://theconversation.com/cigarette-butts-are-the-forgotten-plastic-pollution-and-they-could-be-killing-our-plants-119958>

We would therefore support extending the proposed EPR to tobacco companies to make them responsible for dealing with the waste their industry produces and we would support Mark Drakeford's leadership manifesto pledge to ban smoking in town and city centres to try to reduce the number of smokers in Wales.

Litter

We would support the production of a Litter Prevention Plan for Wales. Most of the most commonly littered items will start to be addressed through SUP bans, a latte levy, EPR and DRS. The remaining items must also not then be forgotten, from cigarettes (as we mention above), other food and drink containers and packets and even dog poo.

Enabling communities and businesses

Q14: Is our continued business support to make them more resource efficient a priority action?

If it is linked to specific targets and can show clear outcomes then yes.

Q15: How would you view starting a Zero Waste Town area?

This is something Friends of the Earth Cymru has been calling for and we are delighted this is included in this consultation.

Zero Waste Scotland have trialled the concept of zero waste communities or towns and there is much learning we can do from their work.

The 'plastic free towns' initiative by Surfers Against Sewage has shown there is a lot of interest amongst communities everywhere in working together to reduce plastics, waste in general and working towards a specific end goal.

A new Zero Waste Towns scheme in Wales would be the logical next step, bringing together actions on SUPs, food waste, repair initiatives and community lending schemes.

Currently a lot of these initiatives sit side by side in communities or there is a situation where some exist in an area but not all of them.

Creating a national scheme that brings together all of these different aspects and underpins it with help and support and some form of accreditation scheme so progress can be measured would help stimulate community level action across the board. It would also act as a possible fore-runner of a wider 'climate action communities' scheme which could seek to include other community led initiatives such as on transport, energy, water, chemicals, food, textiles and finance.

The Green Shed enterprise in Haverfordwest suggests a possible successful model with a 'community hub' being established to house some or all of the possible zero waste initiatives a community could introduce, from a space where products are repaired, lending libraries are based, upcycling initiatives are housed and even potentially providing space for remote working opportunities, community growing initiatives and community real nappy laundry facilities.

This scheme could be funded from monies raised through a new Latte Levy and would stimulate real grassroots involvement in zero waste solutions as well as providing learning opportunities and visits for local schools in each area.

Q16: Are the suggested actions in this theme (Enabling communities and businesses) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Right to repair

The European Commission, in 2019, ratified the Right to Repair regulations (<https://industryeurope.com/right-to-repair-rules-to-be-adopted-in-eu-from-2021/>) covering items such as washing machines, dishwashers, refrigerators, televisions and lighting. Whilst this was a very welcome and positive step forwards it fell short of what organisations and campaigners across Europe were calling for, namely that these regulations should also cover the right of ordinary citizens to repair the goods rather than just professionals.

We would urge the Welsh Government, especially in the light of Brexit, to investigate what can be done in Wales to achieve a situation where the 'right to repair' is one in Wales in which citizens as well as professionals can repair goods with easily accessible tools thereby saving families money and also at the same time, encouraging new business opportunities throughout Wales.

Toy Libraries

Toy libraries have an important role to play given how quickly children grow out of age specific toys, how much some toys can cost and also how many of these toys are made from plastic and mostly produced overseas (thereby increasing climate emissions).

Welsh Government can use Play Wales / Chwarae Cymru

(<https://www.playwales.org.uk/eng/toylibraries>) to help roll out a nationwide network of Toy Libraries which complement other share, reuse and repair schemes that will form part of the new community level vision as to how we not just reduce resource use and waste but also how we seek to improve community cohesion and fairer access for all to better quality resources.

Home and community composting and wormeries

WRAP estimate that around one third of the waste sent to landfill in the UK could be transformed into compost and diverted from disposal. Compost has multiple uses including as a soil improver, mulch, plant feed or growing media.

Home composting is beneficial in that it enables householders to put organic matter back in to their soil without loss of natural habitat (such as through peat extraction) and to help gardens retain moisture. Community composting can be used to complement home composting or replace it where home composting is not viable, for example in areas of flats or multi-occupancy houses with very limited or no garden space.

http://www.wrap.org.uk/sites/files/wrap/Home%20composting%20guidance%20for%20local%20authorities_0.pdf

It can also help save homeowners money by not having to buy compost from garden centres, thereby also reducing some plastic usage.

Incorporating information and help on these into a new Zero Waste Towns scheme would make sense whether that is through an easy to engage with 'hub' of information (rather than the information being spread out in various places and different organisations) and/or via a network of individuals who can act as some sort of 'composting champions' who are able to give communities help, training and advice on composting techniques and the use of wormeries.

Investing in infrastructure

Q17: Are the initiative actions mentioned here those we should aim to provide supporting infrastructure for?

Refuse collection vehicles

We note an interesting recent development in Cheshire (<https://www.h2-view.com/story/rubbish-in-cheshire-to-be-collected-by-green-hydrogen-powered-bin-wagons/>). This obviously has cross cutting benefits too in terms of reducing air pollution. We support WG, Local Authorities and waste management companies in Wales working together to investigate the possibility of introducing this type of vehicle or other zero emission vehicle in Wales too.

Door step deliveries

Services such as the traditional 'Milkman' have been regaining interest, support and extra business over the last year or 2 since the success of the Blue Planet 2 phenomenon. This represents a positive business opportunity for Welsh farmers and producers, especially if these products are local, packaged sustainably (reusable glass bottles for milk for example) and delivered by electric vehicles (not diesel!).

This type of infrastructure and business support is something that is worth exploring in Wales with a view to supporting small and medium sized Welsh businesses as well as helping move towards zero waste and in terms of transport, helping reduce emissions.

Q19: Are the suggested actions in this theme (Investing in infrastructure) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Incineration

The 'Beyond Recycling' consultation mentions the aim not to send any more 'waste' to landfill (page 9). If we are serious about moving towards actually living in a 'zero waste' society, then this must also apply to not sending any more 'waste' to incineration. Branding incinerators as 'energy from waste' facilities is a misnomer. They are incinerators and they burn materials.

The arguments against incineration are well known by now, ranging from the length of contracts that are required for councils to supply these incinerators with burnable materials, to concerns over air quality and climate emissions and residual ash.

In the context of this consultation and how it fits in with the climate crisis we are all faced with, including incineration as a viable 'end destination' for materials seriously undermines the goal of becoming a zero waste nation. Our goal needs to be not to produce anything that can't be somehow refilled, reused, composted or recycled.

The goal for incineration, surely, needs to be that we phase out these facilities entirely, that we develop a timescale for that to happen and that we do not give consent for any new incinerators in Wales from this point onwards. As we move to a situation where we produce less products, use existing products better and more efficiently and only produce products that can be reused or recycled, we shouldn't even have a need for incinerators. This needs to be addressed now due to the length of contracts that Local Authorities sign up to with incinerator companies. We can't kick this issue into the long grass. Phasing out of incinerators needs to be part of this consultation and part of any new Beyond Recycling and Zero Waste plan and strategy.

Other questions

Q22: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to address them.

In June 2019, the National Assembly for Wales Climate Change, Environment and Rural Affairs Committee published a report called 'Report on policies and proposals relating to plastic pollution and packaging waste'

It's recommendations include that more work is done on understanding the nature and effect of micro and nano particle plastic pollution. We echo these recommendations and suggest that the Welsh Government investigates as a matter of urgency, how it can support and facilitate the necessary research to be done in Wales to help inform future policy decisions.

<https://www.assembly.wales/laid%20documents/cr-ld12549/cr-ld12549-e.pdf>

Lithium-ion batteries

There are on average now around 11 devices in an average household that use a lithium-ion (Li-on) battery. The Global Battery Alliance predicts that globally by 2030 we will have generated 11m tonnes of spent Li-on batteries. The UK is the second biggest market in Europe for Li-on batteries but there are at present (as we understand it) no Li-on recycling plants in the UK. With the rapid increase of electric cars and associated battery needs (production and recycling), it would seem like a good business opportunity for Wales to become a hub for Li-on batteries.

(<https://www.birmingham.ac.uk/news/latest/2019/11/uk-needs-to-act-to-prevent-electric-vehicle-battery-waste-mountain.aspx>)

Green waste contamination with plastics

We are concerned with the issue of plastics

(https://www.theguardian.com/environment/2018/dec/15/legal-plastic-content-in-animal-feed-could-harm-human-health-experts-warn?CMP=Share_iOSApp_Other) and other items contaminating the green waste that is collected by local authorities and then subsequently spread on agricultural land.

This issue was highlighted recently on the BBC TV programme Countryfile

(<https://resource.co/article/bbc-highlights-green-waste-contamination-problem-10158>). We would support clear guidelines and good communication between WG, Local Authorities, waste collection companies and residents on best practice as well as sector targets to reduce this contamination.

Biodegradable bioplastics

As we move away from single use plastics, there has been a lot of interest in products made from biodegradable bioplastics. Our waste collection and treatment infrastructure is however not yet geared to dealing with these products and how they are collected and treated can vary on geographical area.

We advocate that WG, product manufacturers, local authorities and waste management companies work together to ensure that where these products are being used, that they can be collected and taken to industrial composting facilities instead of ending up in landfill or being incinerated.

'Non recyclable waste'

This consultation also makes mention of 'non recyclable waste' materials (page 22). This term is used to validate the existence of incinerators. Whilst this consultation and the resultant policy will address many of those materials, we recommend that a specific action plan is drawn up to communicate which materials currently are sent for incineration and what steps will be taken to eliminate all of these materials from the 'waste' stream.

Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Bleddyn Lake
Organisation (if applicable) Friends of the Earth Cymru

If you want to receive a receipt of your response, please provide an email address. Email address

bleddyn.lake@foe.co.uk