



**Response to
National Assembly for Wales consultation
*Managing Waste Sustainably***

**Friends of
the Earth
Cymru
Cyfeillion
y Ddaear
Cymru**

**Friends of the Earth Cymru
October 2001**

Friends of the Earth Cymru

Friends of the Earth is the largest environmental campaigning network in the world with groups in 68 countries. Friends of the Earth Cymru is the national office in Wales of Friends of the Earth England, Wales and Northern Ireland. Friends of the Earth exists to inspire solutions to environmental problems that make life better for people.

Introduction

We welcome the opportunity to respond to the consultation paper *Managing Waste Sustainably*. The very fact that the National Assembly for Wales has taken this issue seriously, and has committed so much time and resources to the development of the strategy is also welcome.

We will be restricting our response to the consultation to those issues that are currently priority areas for Friends of the Earth Cymru's work. Where we have answered particular questions in the consultation document this is indicated in brackets in the text.

Friends of the Earth Cymru has no objection to this response being available for public scrutiny.

Zero-Waste

It is time for the National Assembly to make a complete break with the failed waste management regimes of the past. The Assembly's duty to sustainable development gives it both the opportunity and the responsibility to move from waste management to waste elimination. Many governmental bodies and corporations are making a commitment to "zero-waste". This should be incorporated into the final waste strategy for Wales as the most fundamental objective of any strategy that deals with "waste" in a sustainable development context.

The concept of zero-waste has gained much ground in New Zealand and is excellently described at <http://www.zerowaste.co.nz/>. Zero-waste, as a philosophy, demands changes in all systems to eliminate waste and promote recycling, composting and waste minimisation.

Around eighty percent of waste currently generated in Wales can be recycled or composted today. With progressive policies of recycling and composting, waste minimisation, support for

technical innovation and a supportive legislative framework, Wales can become a zero waste country within twenty five years.

We recognise that not all the necessary measures to achieve this are in the current powers of the Assembly, and that the Assembly will need to use its influence at UK and EU level to effect real changes in regulations. A firm commitment to zero-waste in the strategy will give it a strong position in negotiations and set an example of best practice for others to follow.

This should be a fundamental policy adopted as part of this strategy.

Municipal Waste Recycling & Composting Targets

We applaud the step the Assembly has taken in proposing higher targets for recycling and composting than those in the Waste Strategy 2000 for England and Wales. The Assembly is in a perfect position to make a massive difference to the future of waste management in Wales. There are no legal or technical blocks to achieving massive increases in the percentage of household waste recycled and composted in Wales. The blocks are those of money and political will.

Therefore we call upon the Assembly to set greatly increased targets for recycling and composting of household waste (Q 11).

We would suggest:

- 30% by 2003/4;
- 50% by 2006/7;
- 60% by 2009/10;
- 70% by 2012/13.

We would emphasise that targets such as these, though ambitious, are achievable. Canberra achieved a recycling rate of 59% within eight years. Switzerland and Germany are already achieving over 50% recycling.

It will take investment. The £40 million investment already underway is welcome. Yet the relatively small amounts of money involved indicate what could be done with the injection of more investment and the development and spread of best practice throughout Wales.

Statutory Targets on Local Authorities

We do not believe that the targets laid out in the Assembly's draft plans, let alone our suggestions for higher rates of recycling and composting, will be met unless they are statutory on Local Authorities. The seriousness of the situation must be brought home to local authorities in Wales if they are to be persuaded to take meaningful action. Therefore, we propose that the targets for recycling and composting adopted in the strategy should be made statutory on local authorities. In tandem with this, the Assembly must guarantee funding to local authorities to assist them in meeting those targets.

Waste Minimisation

Waste minimisation is key to achieving zero waste in Wales. We recognise that the Assembly cannot achieve waste minimisation alone, yet there is still much that it can do. It is very much desirable to set waste minimisation targets for the public, industrial and commercial sectors (Qs 13 & 14).

This should also be the case for municipal waste. The Assembly must use its influence to push for measures at a UK and European level to promote waste minimisation. The Assembly should also prioritise support for waste minimisation projects in Wales. This could be done directly, but more likely through Assembly agencies. The WDA should take a lead role in developing both recycling and waste minimisation in Wales (Q 52). We suggest that this will require a concerted effort and commitment of new resources and acquisition of new and emerging expertise over an extended period of time.

We support the idea that the Assembly should set targets for municipal waste minimisation. The Assembly's favoured target is rather weak to achieve the meaningful decrease that is so clearly needed. We support option B as laid out in 4.10 (Q 9).

Waste minimisation will require wider action than in Wales alone. It is important that there are changes in patterns of consumption which will facilitate both a reduction in the quantity of waste produced and the nature of that waste. So we agree strongly that the Assembly should make representations to the UK Government to introduce differential taxes for greener products (Q 36).

Incineration

Incineration is not an acceptable technology for waste management in a country which has not yet managed to recycle ten percent of its municipal waste. Incineration destroys resources and destroys recycling. The rates of recycling and composting forecast for incineration schemes currently under consideration or construction in Wales and other parts of the UK are superficially impressive against the current levels of recycling achieved. However, in five to ten years time, the existence of incinerators in communities across Wales would present a major block to further development of recycling and could lead local authorities into "waste maximisation" in order to meet legally binding commitments to incinerator operators.

Incineration wastes resources and is prohibitive to waste minimisation and recycling. It leads to pollution problems from wastes released to air and land and creates anxiety in communities adjacent to incinerators.

On this basis, we support the Assembly's initial view that recovery of energy from mixed waste should not count as renewable energy (Q 34) and the need for an energy from waste tax (Q 35).

We believe that the National Assembly should go further than this and use its planning powers to resist the building of incinerators in Wales for at least ten years. This would involve a clear statement that, in present circumstances, the use of incineration in Wales is incompatible with sustainable development. Ten years will give an appropriate period to establish recycling and waste minimisation schemes across Wales. The review would give an opportunity for a full reassessment at the end of the ten year period.

Recycling/Composting and Employment

Managing Waste Sustainably gives an interesting analysis of the numbers of jobs potentially created in Wales through higher levels of recycling (6.50 - 6.55). Many studies have concluded that recycling and composting create far more jobs than incineration or landfill. To illustrate, the table below shows the results of a study in New York City. It is very difficult to make a credible forecast of the jobs that could be created with a Wales which is within a wider economic and political union. However, if we work to create markets and to develop recycling industries within Wales then it is possible for us to take advantage of innovation and develop healthy and sustainable industries in Wales.

Jobs per 1 Million Tons of Waste Processed

Type of Waste Disposal	Jobs
Landfills	40-60
Incinerators	100-290
Mixed Solid Waste Composting	200-300
Recycling Facilities	400-590

Source: New York City Department of Sanitation. Cited in Renner, M. 1991. Jobs in a sustainable economy. Washington DC, Worldwatch Institute.

Conclusion

Managing Waste Sustainably is a welcome start to the debate about waste management and, hopefully, waste elimination in Wales over the next twenty five years. If the Government of Wales leads the way then the people of Wales will follow. All public opinion polling shows that people have a keen desire to get involved in waste minimisation, recycling and composting schemes. Local Authorities in Wales have long complained that they do not have the resources to recycle as much as they would like. We now have the opportunity to change all that.

If the Assembly is prepared to lead the way - to take bold and innovative action then the people of Wales can reap the social, environmental and economic benefits of a low waste, and eventually a zero-waste, society. That would truly be in line with the principles of sustainable development.

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