

## Environment and Sustainability Committee

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Meeting Venue:

**Committee Room 3 – Senedd**

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Meeting date:

**Thursday, 17 July 2014**

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Meeting time:

**09.20**

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Cynulliad  
Cenedlaethol  
Cymru

National  
Assembly for  
Wales



For further information please contact:

**Alun Davidson**

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### Agenda

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**Informal pre-meeting (09:20 – 09:30)**

**1 Introductions, apologies and substitutions**

**2 Inquiry into Recycling in Wales: Evidence from the Chartered Institute of Wastes Management (09:30 – 10:10) (Pages 1 – 16)**

E&S(4)-19-14 paper 1 : Chartered Institute of Wastes Management

Rebecca Colley-Jones, Chair, CIWM Cymru Wales Centre

Steve Lee, Chief Executive

**3 Inquiry into recycling in Wales: Evidence from the Local Authority Recycling Advisory Committee and Waste Awareness Wales (10:10 – 10:50) (Pages 17 – 18)**

E&S(4)-19-14 paper 2 : Local Authority Recycling Advisory Committee

Lee Marshall, Chief Executive, LARAC

Craig Mitchell, Head of Waste Support, Waste Awareness Wales

Dan Finch, National Campaigns Manager, Waste Awareness Wales

**Break (10:50 – 11:00)**

#### **4 Inquiry into recycling in Wales: Evidence from WRAP Cymru and Eunomia (11:00 – 11:30) (Pages 19 – 29)**

E&S(4)-19-14 paper 3 : Wrap Cymru

E&S(4)-19-14 paper 4 : Eunomia

Marcus Gover, Director for Wales, WRAP Cymru

Dr Dominic Hogg, Chairman, Eunomia

**Break (11:30 – 11:40)**

#### **5 Inquiry into recycling in Wales: Evidence from Bryson Recycling (11:40 – 12:15) (Pages 30 – 33)**

E&S(4)-19-14 paper 5 : Bryson Recycling

Eric Randall, Director

#### **6 Papers to note**

##### **Inquiry into the public forestry estate in Wales: Further Information from Natural Resources Wales (Pages 34 – 38)**

E&S(4)-19-14 paper 6

##### **Inquiry into the public forestry estate in Wales: Further information from Confor (Pages 39 – 40)**

E&S(4)-19-14 paper 7

##### **Biodiversity: Further information from RSPB (Page 41)**

E&S(4)-19-14 paper 8

##### **Letter from Minister for Economy, Science and Transport: Royal Welsh Show 2014 (Page 42)**

E&S(4)-19-14 paper 9

**7 Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for items 8 to 11**

Break (12:15 – 13:15)

**8 The Well-being of Future Generations (Wales) Bill: Scope and approach to the Committee's Stage 1 scrutiny (13:15 – 13:45) (Pages 43 – 81)**

E&S(4)-19-14 paper 10

**9 Forward Work Programme (13:45 – 14:15) (Pages 82 – 85)**

E&S(4)-19-14 paper 11

**10 Inquiry into the Welsh Government's proposals for the M4 around Newport: Consideration of draft report (14:15 – 14:30) (Pages 86 – 96)**

**11 Infrastructure Bill LCM (14:30 – 14:45) (Pages 97 – 109)**

E&S(4)-19-14 paper 12

# Agenda Item 2

Document is Restricted

**National Assembly for Wales**  
**Environment and Sustainability Committee**  
**RW 30**  
**Inquiry into recycling in Wales**  
**Response from: Chartered Institution of Wastes Management**



**The Chartered Institution  
of Wastes Management**

**CIWM Cymru Wales**

Celine Anouilh, LCIWM, Regional Development Officer  
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Committee Clerk,  
Environment and Sustainability Committee,  
National Assembly for Wales,  
Cardiff Bay,  
CF99 1NA

Monday 9 June 2014

**Dear Sir or Madam**

**RE: National Assembly for Wales Inquiry into recycling.**

We have received an invitation to provide evidence to the inquiry into recycling.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 6,500 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste and resource management industry and has various grades of membership determined by education, qualification and experience.

The Cymru Wales Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the inquiry into recycling.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste management and resource industry. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the sustainable management of all wastes.

The inquiry invite sought response in the following areas.

- i. Explore reasons for and impacts of variations in local authority household waste recycling practice in Wales.
- ii. To what extent local authorities' recycling practice aligns with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint, and to explore barriers and enablers to adherence.
- iii. Assess the availability of information and guidance to householders about why and how they should be recycling, and to explore potential barriers and enablers to improving recycling rates.
- iv. Explore Local Authority reactions to the recently published Waste Regulations Route Map and the potential impacts and implications of this on recycling practice across Wales.
- v. Gain greater understanding of the relationship between recycling collection practice and recycling rates.

- 1.1 Welsh Government (WG) has many policies in their waste strategy aiming towards increasing the quantities of waste recycled and the quality of the secondary materials produced as a result. The policies are geared towards improving the use of secondary raw materials (recycled wastes) within industry in Wales and to move towards a circular economy where all waste materials are used rather than disposed. In addition a Cradle-to-Cradle design thinking needs to be adopted/pursued to enable the circular economy to work, including designing out waste wherever possible. Where this is not possible, then products need to be designed to be constructed using materials that are abundant both now and in the future reducing reliance on scarcer materials. Measures should also be taken to ensure that these materials are kept in use as long as possible though designing for re-manufacture, reuse and recyclability. If this is not possible then the products should at minimum be designed for dis-assembly). These materials should be easily re-useable or recyclable to enable effective access to component and materials separation which is fundamental for efficacious recycling and reclamation of materials.
- 1.2 WG have targeted the wastes collected by local authorities in the first instance because of the high level of government control over this waste stream through the balance of local government finances provided by the WG relative to the council tax payments and additional ring fenced grant money such as the annual Sustainable Waste Management Grant. For the private sector, government influence is through waste legislation and impact on economic growth must be considered. There is a need for 1. More partnership working between authorities and 2. The development of consistent applications and solutions across the whole of Wales, wherever that is possible – all based upon robust evidence and real data, this requires full disclosure of such data by all into the public domain.
- 1.3 The local authorities in Wales have made huge increases in the amount of waste they collect for recycling since 1998-99. In 1998-99 only 5 per cent of all local authority municipal waste in Wales was collected for preparation for re-use, recycling and composting. This has risen to over half of all waste collected by Welsh local authorities in 2012-13. Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling and, collectively, Welsh local authorities achieved the first target of 52 per cent in 2012-13. Individually, 13 of the 22 local authorities in Wales met or exceeded the 52 per cent target in 2012-13. More emphasis is needed on reuse as this has higher greater social, economic and environmental benefits than recycling, but is more difficult to measure. Also a metric to measure carbon benefits may be helpful in judging the outcomes of Wales' waste policy.
- 1.4 In addition between 2004-5 and 2011-12 there has been progress with reducing the amount of waste produced by households in Wales. The total amount of local authority household waste in Wales, excluding abandoned vehicles, generated in Wales peaked at over 1.57 million tonnes in 2006-07. It has since then been steadily reducing, with 1.35 million tonnes generated in 2011-12.
- 1.5 Additional finance provided by WG to local authorities known as the Sustainable Waste Management Grant (SWMG) commenced in 2001-02 and has increased substantially over the years. The SWMG finance has been allocated according to Barnett formula and totals across Wales from £1.5 million in 2001-02 to £71 million in 2012-13 totalling £473.5 million over that period of time. In addition to this revenue funding there have been specific capital allocations and associated revenue allocations available to local authorities from WG to support the development of recycling and to support sustainable waste management infrastructure for separately collected food waste through anaerobic digestion and residual waste treatment. The provision of this ring fenced finance has enabled local authorities in Wales to increase their recycling rates and decrease the amount of waste they collect as noted above. More of this funding needs to be used for reuse and other waste prevention outcomes. More funding is needed in total across the board if the Welsh strategy is to be achieved.

- 1.6 The WG Municipal Waste Sector Plan Collections Blueprint issued in 2011 sets out recommended service profile for the collection of waste from households. However, many local authorities had already started recycling service provision many years before in order to comply with requirements to divert waste from landfill under the Landfill Allowances Scheme (Wales) Regulations 2004. This has resulted in each local authority delivering services in different ways. WG offers all local authorities the opportunity to participate in a Collaborative Change Programme on the delivery of services. This aims to ensure that Wales meets the high recycling targets set out in Towards Zero Waste and follows the Collections Blueprint delivery model.
- 1.7 The delay in providing the detailed advice on WG's preferred method of collection of wastes for recycling through kerbside sort, (although this method was encouraged in the previous waste strategy for Wales 2001 "Wise About Waste"), has contributed to the local authorities in Wales adopting diverse methods for the collection of wastes for recycling from households. The advice should be reviewed in the light of evidence in the next few years.
- 1.8 The costs of changing the type of recycling waste collection service can be considerable taking into account the provision of bins and boxes, together with the specialised collection vehicles. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it takes considerable time to implement changes across the entire local authority area. In addition, even after roll out, there will be local issues where it may not be possible to provide the same collection service for all dwellings within a local authority such as densely populated areas (i.e. flats) and sparsely populated areas (i.e. rural areas).
- 1.9 The result obtained by local authorities in terms of recycling percentage against their service profile does not provide evidence of a link between performance and collection method, see Table below. Accuracy of data, actual tonnages and recyclate quality are also highly important to this point.

kerbside sort	2012-13 % recycling	rank	single stream commingled	2012-13 % recycling	rank	single stream - glass	2012-13 % recycling	rank	twin stream	2012-13 % recycling	rank
Anglesey	55.2	6	Cardiff	52.2	13	Pembrokeshire	53.1	11	Monmouthshire	55.5	5
Gwynedd	51.2	15	Denbighshire	58	1				Blaenau Gwent	51.2	14
Conwy	56.4	4	Caerphilly	57.1	3				Swansea	47.5	20
Flintshire	54.9	7	Vale of Glamorgan	54.5	8				NPT	48.3	19
Powys	50.9	16	Merthyr Tydfyl	49.1	18						
Newport	49.2	17	Ceredigion	53.6	10						
Bridgend	57.1	2	Carmarthanshire	53.8	9				>55%		
Wrexham	52.8	12	RCT	46.2	22						
Torfaen	47.1	21							<52%		

- 1.10 Recent changes to the regulatory framework in respect to Material Facilities (MFs) coming into force on 1<sup>st</sup> October 2014 and provisions with respect to separate collection of materials for recycling coming into force on 1<sup>st</sup> January 2015 are pertinent to the issues subject to this inquiry. The effect of these regulations will be to increase the transparency of the reject rates and the quality of materials produced by all MFs, together with the quality of the materials supplied by each supplier. This will enable local authorities to better target their advice to householders to improve the quality of the materials they deliver to MFs for sorting and to choose the MFs that they use with evidence regarding the efficiency of their sorting practices. However, it is our view that it is too soon to provide analysis of this given that these regulatory developments have not yet been implemented.

- 1.11 Given that during the next few years it will be possible for local authorities to understand the actual amounts of the different materials that they send to MFs that is recycled, it may be sensible for surveys of the quality of materials collected through kerbside sort methods as a comparator for Welsh authorities. It will need strong leadership to ensure the correct protocols and techniques are adopted.
- 1.12 One such study was produced by Zero Waste Scotland but this only contains a small amount of data from Welsh local authority collection schemes.
- 1.13 We feel it would be important for WG to institute Wales wide analysis of the quality of materials collected through kerbside sort methods to assist local authorities in Wales making decisions in relation to their compliance with the requirements for separate collection given that co-mingled collection of materials for recycling is permissible provided the materials leaving the facility are of comparable quality to kerbside sort methods of collection of materials for recycling. The evidence of the comparability of quality in the outcome between kerbside sort and outputs from MFs following comingled collection would be important for local authorities in service delivery choices and to ensure resilience of markets for the materials.
- 1.14 The [WRAP regulatory road map](#) details the process that local authorities should go through to document their decision making process with regard to technical, environmental, economical, practicable (TEEP) test. Within that guidance if it is not clear that separate collection would increase the quantity or quality of the materials recycled then it is possible that change from comingled collection would not be required. In order to have evidence available to local authorities in Wales on the quality of materials provided by kerbside sort further evidence of the quality of materials derived from kerbside sort collection.
- 1.15 More guidance for households is required on what can be recycled through each council's collection scheme including reuse opportunities locally available and the need for waste prevention. This could be achieved through local events.
- 1.16 CIWM Cymru is of the opinion that there is a need to establish the full benefits that recycling/re use provides to the individual and local community, this then needs to be communicated and readily available for individuals to access. Such information to be provided should include:
- Where the individual materials are taken for re-use/recycling processes
  - What types of new products are produced from the recycled materials.
  - Geographically within Wales how many jobs have been directly created from recycling?
  - What social, economic and environmental wealth recycling is contributing to the national and local economy?

This information should be available in a simplistic, easy to read format, that can be easily accessed by the public to demonstrate the benefits that are accruing to them and their local community by them actively participating in recycling of their household waste. This would provide a direct incentive to increase future participation. This information needs to be regularly updated and relevant.

Should you have any query with regards to our response, please do not hesitate to contact us.

Kind regards

**Celine Anouilh**  
**CIWM Regional Development Officer for Wales**

**(For CIWM Cymru Wales)**





Committee Clerk,  
Environment and Sustainability Committee,  
National Assembly for Wales,  
Cardiff Bay,  
CF99 1NA.

June 2014

## **Inquiry into Recycling in Wales**

Thank you for the opportunity to present our initial response to the above.

These views are sent on behalf of the Local Authority Advisory Committee (LARAC). LARAC is an association of around 75% of UK local authorities, including 21 from Wales.

Our responses have been peer reviewed by members of LARAC's policy team and executive committee, and all LARAC members have been invited to comment. All contributions have been taken into account in drafting the points below.

We would be happy to give oral evidence to the inquiry, if invited.

If you have any queries on this response please contact me at [paulquayle@monmouthshire.gov.uk](mailto:paulquayle@monmouthshire.gov.uk) or telephone 01633 644192.

Yours faithfully

Paul Quayle  
LARAC Wales Representative



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

GREEN GLASS

1. Clearly the variations in local authority waste recycling practice is, in part, an inevitable consequence of having 22, relatively small, local authorities – a matter being considered separately. At the inception of the Welsh Government all 22 authorities started from different baselines. However, that variation allows local authorities the flexibility to adjust their service to suit the demographics, and wishes, of their particular area. Given the close cooperation between authorities in Wales (directly and through groups such as Waste Awareness Wales, LARAC, South Wales Regional Group etc.) such diversity enables a greater understanding into what is a common goal – meeting their recycling targets, in these austere times.
2. We do acknowledge that the lack of consistency in container colours may tend to cause confusion to residents moving around the principality.
3. This variation, across Wales, suggests that local authority recycling practises are not fully aligned with the Welsh Government's Municipal Waste Sector Plan Collection Blueprint but LARAC believes the quality of material should be determined by the requirements of the reprocesses. Processing technology continues to develop, which, we would expect to lead to further reductions in the quality gap of the finished product. Furthermore, there has not been an acceptance by LA's that the Blueprint is actually the answer, and the fact that collection systems not aligned to the blueprint are delivering high levels of material that have end markets shows that local circumstances need to influence collection systems.
4. We believe that actually how we do it isn't really the issue. Doing it and meeting the targets in a cost effective manner that residents buy into is what we should be focussed on. Ultimately each Authority has to strike the right balance between quality and participation/capture rate – no scheme can be successful unless it is popular with the public. Communications and education is probably more important than the Bins/Boxes and Lorries.
5. Having been involved in the development of the route map LARAC welcomes it and hope it is used to add clarity to the arguments already put forward.
6. Finally we find it rather interesting that the National Assembly is calling for this inquiry considering how well Wales and Scotland are doing in comparison to England – largely due to the policy context. So we consider the Welsh Government have done a good job setting the policy direction and giving some tools to assist – but they need to stop short of then telling authorities how to do it.

National Assembly for Wales  
Environment and Sustainability Committee  
RW 45  
Inquiry into recycling in Wales  
Response from: WRAP Cymru

## **Memorandum by WRAP Cymru (the Waste & Resources Action Programme in Wales)**

### **Executive Summary**

1. WRAP Cymru welcomes the opportunity to provide written evidence to the Environment and Sustainability Committee's Inquiry into Recycling in Wales. WRAP Cymru was established in September 2008 and is the Welsh Government's delivery partner for waste and resource efficiency issues. As a member of the Waste Strategy Steering Group, WRAP has actively supported the development of the Welsh Government's overarching waste strategy 'Towards Zero Waste, One Wales: One Planet' and has utilised its expertise in drafting several of the waste sector plans. WRAP Cymru draws on the extensive technical experience across WRAP and has advised the Welsh Government on diverse issues such as end of waste criteria and safety and use of anaerobic digestate. Further information on WRAP Cymru's role and remit is at Annex 1.

2. WRAP Cymru's key priorities are:

- Working with businesses in Wales to drive down the amount of unnecessary packaging and food waste;
- Supporting the development of the infrastructure in Wales for recycling by helping businesses and markets to grow;
- Increasing the diversion of biodegradable waste into quality products such as compost and digestate; and
- Working with the Welsh Government and the WLGA to deliver the Collaborative Change Programme.

3. Our delivery is based on building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. WRAP works efficiently and cost effectively, always seeking to improve the quality of thinking, delivery and outcomes. The Collaborative Change Programme is a Welsh Government programme that has been established to help local authorities play their part in delivering the targets of 'Towards Zero Waste'. WRAP Cymru delivers the programme and in doing so supports authorities in their efforts to meet the targets of the Municipal Sector Plan.

4. We hope that this evidence will be of use to the Committee, and would be happy to expand upon it further in oral evidence if that would be helpful.

### **Response to the Call for Evidence**

***Q. To what extent do local authorities' recycling practices align with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint? What are the barriers to, and enablers of, adherence to this Blueprint?***

5. The fundamental aspects of the Collections Blueprint are weekly multi-stream (sometimes referred to as kerbside sort) collections of dry recycling combined with food waste collection, restricted residual waste collection and a chargeable garden waste collection. The 2013/14 audit data shows that:

- All 22 authorities offer food waste collection;
- 11 authorities operate multi-stream collections (with a further 2 in the process of changing to multi-stream), 7 operate a co-mingled service and 4 operate a 2 stream service;
- All authorities have moved to a fortnightly residual waste collection but few have reduced to the 140 litre bin as recommended in the blueprint;
- Most authorities collect paper, card, glass and cans; only 4 do not collect plastic as well, as recommended in the blueprint; and
- 9 authorities charge for the collection of garden waste.

6. There are various barriers to adherence, such as:

- The funding and timing of change: although the Blueprint is a cost-effective system, there may well be an investment required to fund the change. This investment will vary according to the particular point an authority is at in its capital purchase cycle for the procurement of vehicles and containers;
- Co-mingled collections use the same equipment as refuse collections (rear end loading compaction vehicles and wheeled bins or sacks) and the workforce know how to work with this equipment. The change to multi-stream collection can be more challenging;
- More work may be required to make the business case for change to some authorities; and
- Implementing change can be resource intensive, making it a challenge in resource-constrained times.

7. The enablers of adherence to the Blueprint will address some of these issues by:

- Targeting funding in support of delivering the policy;
- Supporting the development of business plans that establish the case for change;
- Providing support to local authorities to address capacity and experience issues related to change management and the mobilisation of new services; and
- Supporting the procurement of capital equipment and the marketing of the collected materials.

***Q. What is the availability of information and guidance to householders about why and how they should be recycling? What are the potential barriers and enablers to improving recycling rates?***

8. According to recent unpublished WRAP research, a majority of the target population stated that they had received information about how to use their recycling kerbside collection in the past year. A smaller proportion reported having received information on their food waste collection service. Responses appeared similar to the results of similar research in 2013,.

9. When asked how confident they were about which materials could be put in their recycling collection and which could not, a large majority were confident or mostly confident.

10. However, comparison with collection services shows that householders' confidence is sometimes misplaced. Some of those respondents with high levels of confidence placed items in their recycling that were not accepted by their local scheme.

11. Our research shows that claimed levels of recycling are high across a range of materials. However, there remains scope for improvement.

12. Additional WRAP research shows that there are four main types of barriers to householders recycling effectively. These types of barriers (which are often mutually interdependent and should be approached in an integrated, context-specific way) are:

- Situational (e.g. inadequate containers or a lack of space);
- Behavioural (e.g. is recycling part of the household routine?);
- Knowledge (e.g. not knowing what to put in each container); and
- Attitudinal (e.g. not believing there is an environmental benefit).

***Q. What have been the reactions of local authorities to the recently published Waste Regulations Route Map? What are the potential impacts and implications of this on recycling practices across Wales?***

13. The Waste Regulations Route Map was published on 22 April 2014 and is hosted on the WRAP website. It was developed by the local authority waste networks in England to raise awareness amongst English local authorities of the Regulations and to provide them with more information on the requirements of the Regulations.

14. Overall industry and local authority reaction to the Route Map has been positive and it has attracted a lot of interest. As part of its development the Route Map was peer reviewed by 20 English local authorities. These authorities covered the range of authority types in England, and represented the broad mix of current service provision as well as a mix of urban and rural authorities. The review tested whether authorities understood the implications of the regulations and how they would apply the Route Map to their own service. The feedback received helped to shape the final version of the Route Map.

15. The Chartered Institution of Wastes Management (CIWM) commented that '*... [the Route Map] offers the opportunity for local authorities to carry out their assessments in a consistent way that will stand up to scrutiny, and a common framework for those who wish to work together and share approaches.*' There have been over 1600 page views on the WRAP website and a recent webinar hosted by WRAP attracted over 130 participants. It is still early days so we are not able to say how many English local authorities are using the Route Map but it is clear that it has filled an important information gap in terms of raising awareness of the Regulations.

16. In terms of implications for recycling practice across Wales, we believe it is unlikely that the Route Map will have a direct impact. It may be helpful to local authorities in Wales in understanding the Regulations, in identifying key questions they may need to consider locally and in providing them with a process to follow to assess their compliance.

17. There are, however, a range of other drivers that are more likely to directly impact on recycling practice in Wales, including the statutory targets, the Collections Blueprint and the Welsh Government's guidance on the separate collection requirements which is out for

consultation currently. The Route Map, like the WLGA Business Planning toolkit, is a tool to help local authorities to systematically review their collection arrangements. It does not tell a council what is best for them to do locally.

***Q. What is the relationship between recycling collection practices and recycling rates?***

18. There are a number of relatively clear factors affecting recycling rates and some that are less obvious. Some of these factors have been identified in some recent unpublished WRAP research:

- There is a clear relationship between the range of materials targeted for collection and the recycling rate achieved: the more materials targeted the higher the recycling rate;
- There is a clear relationship between the restriction of residual waste capacity and the recycling rate achieved;
- Clear communications with householders and periodic reinforcement of messages are important for achieving good recycling rates; and
- Collection service reliability can have a significant impact.

19. Data issues can create interpretational problems. For example, reported recycling rates can vary according to collection system, due to the way material is recorded. Multi-stream collections generally produce good quality materials with minimal contamination, due to the sorting/inspection at the kerbside by collectors. Co-mingled collections are generally carried out using wheeled bins or sacks and thus contaminants are collected alongside the materials. Further to this it is not uncommon for commercial recycling to be co-collected with domestic material in co-mingled systems, potentially further obscuring comparisons.

20. WRAP has produced or commissioned numerous reports over a number of years that compare the cost and performance of different collection systems. Many of these have been for individual authorities throughout the UK, where specific local circumstances can be taken into account. These have been provided to the authorities concerned and WRAP does not put them into the public domain. Some, however, have been more generic studies, including:

- Indicative Cost and Performance report: a generalised report giving indicative data for different categories of authority;
- Kerbside Collection Options – Wales: a report commissioned by the Welsh Government that compared three methods of collection (Co-mingled, two stream and multi-stream). The report considered which of these methods could best deliver the Welsh Government’s sustainability agenda. Six Welsh authorities were modelled and the results were extrapolated to an all-Wales scenario. The study found that, in Wales, multi-stream collections delivered the best results; and
- The Blueprint report: this piece of work has recently been completed and will be published later in the year. It examines performance data from eleven Welsh local authorities operating systems that are close to the Blueprint to determine the likelihood of achieving the Welsh Government’s 70% recycling target.

**Submitted by:**

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01295 819920, [Marcus.Gover@wrap.org.uk](mailto:Marcus.Gover@wrap.org.uk)

13 June 2014

**About WRAP Cymru**

21. WRAP Cymru is the Welsh Government's delivery partner for waste and resource efficiency issues. It was established in September 2008 as a programme delivered in Wales by WRAP.
22. WRAP (the Waste & Resources Action Programme) is an independent, not-for-profit company, recognised in the UK and internationally for our expertise in resource efficiency and product sustainability, our leading-edge evidence, our skills and knowledge and our ability to bring people together to solve problems.
23. WRAP's vision is: 'A world where resources are used sustainably.'
24. We occupy a unique space as a trusted interface between Governments, business, local authorities, communities and organisations working for more sustainable resources.
25. WRAP acts as a catalyst, accelerating change in the behaviour of business and communities in ways that neither governments nor individual companies can do, working on their own.
26. We do this through a combination of:
  - Technical knowledge and the ability to apply that knowledge;
  - An ability to forge partnerships and build alliances;
  - Developing insights into business and consumer attitudes and behaviour;
  - Research and a developing evidence base.
27. Our delivery is based on carefully building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. Tackling these, in the right order and cost effectively, is essential to effective market operation and is at the heart of the way WRAP operates.



**National Assembly for Wales  
Environment and Sustainability Committee  
RW 38**

**Inquiry into recycling in Wales**

**Response from: Eunomia Research & Consulting Ltd**

**NATIONAL ASSEMBLY FOR WALES INQUIRY INTO RECYCLING IN WALES -  
EUNOMIA RESEARCH & CONSULTING RESPONSE**

**1. Consultee background**

1.1 Eunomia is an employee-owned consultancy working throughout the UK, other EU Member States and beyond. Our consultants have experience and expertise in environmental, technical and commercial disciplines, and our main areas of specialism include waste management, low carbon energy, resource efficiency and climate change mitigation. Around 60% of our work is with or related to UK local authorities in their capacity as waste collection and disposal authorities. We have worked with over half of all UK local authorities in the 13 years since our foundation, including a majority of Welsh authorities. We have also delivered major research, analysis and policy projects in Wales for the Welsh Government, WLGA and WRAP.

**2. Alignment with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint, and barriers and enablers to adherence**

- 2.1 We are sure that the Committee will have received detailed information on the extent of 'compliance' with the Collections Blueprint across Wales. One fundamental question to address before considering the barriers to Blueprint implementation is that of whether the robust promotion of the Collections Blueprint is a rational policy for the Welsh Government to be pursuing in the first place.
- 2.2 In answering this question in the context of waste collection, it's helpful to first assess the question of whether, from an overarching perspective, it should (or should not) be the business of central government to have detailed policies on matters such as local authority waste collection systems. If one starts from the premise that there isn't a fundamental reason why central government should stay out of such matters (accepting that this is very much a moot point within the public sector in Wales), the question is then, of the collection systems the Welsh Government could seek to promote as the 'standard' system for households in Wales, is the Blueprint a rational choice? We would conclude that, overall, roll-out of the Blueprint would meet the Welsh Government's social, environmental and economic objectives for waste collection and as such it does constitute a rational choice as a national standard.
- 2.3 It is important to understand though that that the full impact of the Collections Blueprint system on recycling and environmental performance is only achieved when all of the key elements of it are deployed collectively. For example, a weekly kerbside sort collection of recycling and food waste will only achieve its full potential under appropriate residual waste policy, such as the recommended 140L residual bin per fortnight, or similar.
- 2.4 Eunomia has recently completed research for WRAP that looks at the current performance of authorities operating services similar to the Collection Blueprint. This work concluded that full adoption of the Blueprint across all Wales would be likely to result in a national recycling rate in excess of 70%. We consider that the most important barriers to adoption are:
- The reluctance of some authorities to adopt a full separation at source collection system for their dry recycling collection service;
  - The political and operational challenges of implementing appropriate levels of residual waste restriction (e.g. 140L per fortnight); and
  - The political acceptability (or otherwise) of charging for garden waste collection.

- 2.5 Source separation is a critical component in the Collections Blueprint. It facilitates the highest quality of material, insuring that the greatest proportion possible is successfully recycled and makes it more likely that recycling is 'closed loop' (e.g. glass packaging back to glass packaging, as opposed to aggregate). Both of these factors help to maximise the environmental benefits of the service. Full separate collection is also likely to create the largest number of jobs in the local economy whilst maximising the generation of revenues per tonne through the sale of high quality collected materials.
- 2.6 Eunomia has carried out detailed analysis and collections modelling for over 130 UK authorities, including many Welsh authorities. Results from this modelling verify the principles of the Collections Blueprint, indicating that source separation can yield significant financial and environmental benefits. Recent modelling for one Welsh authority on behalf of WRAP showed that moving from its current co-mingled recycling service to a service based on the Collections Blueprint would result in saving of over £1M per year versus 'business as usual' by 2018, whilst meeting recycling targets and increasing employment levels. The saving is equivalent to £37 per household per year.
- 2.7 Where local authorities make major changes to collection systems, performance improvements generally follow. Of the authorities that have moved to a source separated collection system in recent years, all have experienced an increase in recycling rates. Powys has been rolling out a new separate collection service, and last year was the most improved local authority in Wales.<sup>1</sup> Bridgend and Newport (both of which are source separated using Resource Recovery Vehicles) demonstrate the financial potential of this method of collection, operating the lowest cost recycling collection services in Wales.<sup>2</sup>
- 2.8 The potential benefits of this method of collection are significant. However, many Welsh authorities actively promote the benefits of their co-mingled services and are understandably resistant to change, given the political and operational implications of undertaking a major overhaul of such a front-line service. We believe that the reluctance to move towards the Welsh Government's policy preference is part due to a lack of full understanding of the relative costs and benefits of their current systems versus the alternatives, and in part the reflection of a reaction against the robust direction being provided by the Welsh Government.
- 2.9 On the subject of full understanding of the options, we have observed that many Welsh (and English) authorities believe that co-mingled recycling will result in a higher recycling rate. This view is common for a number of reasons:
- Over the past decade, many UK authorities have moved from a source-segregated collection to a co-mingled collection and have reported improvements in recycling performance. However, this change has tended to be accompanied by the introduction of additional materials, increased service coverage and residual restriction. These performance improvements therefore cannot be attributed to co-mingling alone, but rather to the package of service changes implemented.
  - The current system of recording recycling rates accounts for material collected and 'sent for recycling', but not amounts *actually* recycled. The percentage of collected material failing to be successfully recycled is likely to vary considerably between systems, with rates as low as 1-2% being demonstrated for source separated collection.<sup>3</sup> Co-mingled services result in a 'reject rate' at the MRF (the default used for WasteDataFlow is 10.9%) and are likely to lose a greater proportion of materials collected 'downstream' in the reprocessing process. Analysis of data collected by WRAP suggests that this 'downstream' process loss amounts to an average of over 11% in addition to the MRF reject.<sup>4</sup> As a result, headline recycling rates for co-mingled collection are less likely to reflect material actually recycled versus separately collected material.

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<sup>1</sup> Based on 2012/13 data reported on <http://www.wastedataflow.org/>

<sup>2</sup> Based on WLGA benchmarking data

<sup>3</sup> *Contamination in source-separated municipal and business recycle in the UK*, Zero Waste Scotland (2013)

<sup>4</sup> Derived from *MRF Quality Assessment Study*, WRAP (2009)

- Some major waste management companies have a strong commercial interest in promoting co-mingled recycling, as investment in MRF facilities has been considerable. Several of these companies seem to genuinely believe that co-mingled collection is fundamentally 'better'. Efforts to promote co-mingled collection have included media campaigns, lobbying local government bodies and the funding of quasi-independent reports that take a pro co-mingled stance.

2.10 All of these factors have understandably influenced local authority opinion. Common misconceptions regarding source separation, including perceptions that it results in higher financial costs and carbon emissions, are also likely to have an impact on decision making. However, there is now a considerable body of robust, published evidence that sets out the fundamental characteristics, advantages and disadvantages of the different collection systems, which can (all else being equal) be broadly summarised as follows:

- 'Optimised' co-mingled collection systems yield larger tonnages of *collected* material per household, but of that material, a considerably larger proportion is likely to be 'lost' in the supply chain and not ultimately recycled, or to be recycled into products that provide less environmental benefit, relative to 'optimised' source separation systems.
- Collection costs for optimised co-mingled collection systems tend to be lower, but revenues for materials collected also tend to be lower, meaning that in net cost terms it is often found that source separation delivers a lower overall cost.
- Essentially, the difference in approach is that source separation requires collection crews to sort material into different compartments on the vehicle, slowing the collection process down and reducing vehicle payload. Co-mingled collection is quicker and allows larger vehicles to be used efficiently, but material has to be sorted subsequently at a central facility, which is costly and generates material that tends to have a lower unit value relative to source separated material.

2.11 None of these observations is particularly controversial, but the debate within the industry can become polarised, due in part to the real challenges in changing from one system to another. For authorities that currently co-mingle, the key practical barriers to intruding source separation are the need to engage with residents and the greater complexity of the operation. Both are likely to present significant challenges to management and operational officers used to a less complex collection system. Contamination would also have to be addressed as a part of any change management process and would form a key part of a wider communications strategy.

2.12 Whilst improving resident awareness of contamination issues may be difficult in the short-term, maximising secondary material quality is a fundamental cornerstone of the Welsh Government's environmental policies. The European Waste Framework Directive sets out a programme of measures to change to a 'recycling society' and to achieve this vision, an understanding of and full engagement with recycling by householders will be necessary.

2.13 The biggest barriers to residual waste restriction have in the main been overcome, with all Welsh authorities now operating a fortnightly refuse collection service (compared to around 70% in England). However, the next step in further restricting residual containment volume is crucial, as without restricting this to 140L per fortnight (or equivalent) we do not believe that the Welsh Government's longer-term targets will be met.

2.14 It is understandable that replacing an entire suite of residual waste bins can be a daunting prospect. There are often concerns about this being (or being perceived as being) a waste of money. In practice a quick return on investment in replacing bins can often be demonstrated, but this is often difficult to convey to elected members and the public. There are also fears associated with increasing restriction such as fly-tipping, although in our experience these have been largely unfounded in well-managed schemes. Where authorities have recently made changes to their residual bin size, for example replacing 240L with 180L, it may be advisable to look at alternative, three-weekly residual waste collections rather than replacing all bins again. Three-weekly collections are likely to be slightly more cost effective and incentivise greater food waste separation, which has significant environmental benefits.

2.15 Welsh local authorities are provided with funding for their recycling service through the Sustainable Waste Management Grant. This is a significant additional investment not seen in any other part of the UK, and has certainly been a contributing factor to Wales having the highest recycling performance in the UK. This funding, however, is given regardless of service design, and in many circumstances authorities are only able to operate relatively expensive, lower performing services because of it. It would seem to make more sense that this funding was to be targeted at facilitating change towards the Collections Blueprint and compliance with other Welsh Government policy.

### **3. Waste Regulations and Route Map – potential impacts and implications in Wales**

3.1 From January 2015, all waste collectors in Wales will be required by the Waste (England and Wales) Regulations 2011 (as amended) to collect four waste materials (paper, glass, plastic and metal) separately, where it is both ‘necessary’ and ‘practicable’ to do so. Separate collection is ‘necessary’ where this would facilitate or improve recovery (i.e. recycling); while practicability must be assessed in respect of technical, economic and environmental factors. The requirements apply not just to kerbside collected household waste, but also to other waste streams such as commercial waste. Compliance with the regulations in Wales is subject to enforcement by Natural Resources Wales.

3.2 Local authorities will naturally wish to ensure that they comply with the Regulations. In order to achieve this, they will need to carry out an assessment of whether separate collections are necessary and practicable. However there is now a short time remaining before the law comes into effect, and many councils seem to remain unclear about what the law means in practice. Eunomia was recently commissioned to develop a Route Map to guide local authorities through the process of compliance.<sup>5</sup> Whilst the Welsh Government is in the process of consulting on guidance on the waste regulations, even once this is complete it will remain the case that the implications of the law for each local authority are far from self-evident. Given the lack of clarity around many of the key terms (for example “economically practicable” and “high quality recycling”) and the process to be followed, the potential costs of needing to make changes to collection systems and the risk of enforcement, councils are naturally apprehensive. The required assessment is likely to entail:

- Looking carefully at the quality of the material resulting from any recycling they plan to collect co-mingled and check that it is the same as or better than would be the case with separate collection; and
- Undertaking a basic options appraisal, comparing the economic and environmental outcomes of an optimised separate collection system suited to the specific geographical and social context of the authority against one or more alternatives.

3.3 The assessment of necessity and practicability are not simple matters. For example, economic practicability will require careful consideration in the light of the authority’s overall financial position. Even if separate collection were to prove to be more expensive than co-mingled, this may not necessarily mean that it is not economically practicable.

3.4 Councils are keen to obtain advice and practical support to help them work out what action they need to take – but the cost of such advice and the risk that the recommendations may not fit their preferences trouble them. Even having undertaken an assessment of whether separate collections are necessary and practicable, authorities may feel that they need to obtain legal opinion on the soundness of their reasoning, in order to provide a final assurance that the approach to collection they have settled upon is reasonable and can be expected to be compliant.

3.5 The Collections Blueprint’s emphasis on separate collection fits well with the requirements of the Waste Regulations. If it can be shown that adopting the collection model set out in the Blueprint would lead to a high likelihood of being deemed compliant with the law, this could act as a significant incentive for authorities to adopt it, potentially saving them consultancy and legal costs.

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<sup>5</sup> <http://www.wrap.org.uk/sites/files/wrap/Waste%20Regulations%20Route%20Map%20April%202014.pdf>

#### **4. Recycling collection practice and performance**

- 4.1 The Committee is concerned with the variance in recycling performance across Wales, and although there is value in looking at causes, it should be noted that the variance in Wales is actually less than in the rest of the UK. Some variance should be expected due to the different demographics across Wales, and the different levels of services. Merthyr Tydfil, for example, currently has the lowest recycling rate at 48%, providing a co-mingled recycling collection with weekly food waste and free garden waste. Denbighshire operate a similar service configuration, yet their total amount of recycled material is 14% more than Merthyr's. This can be attributed to the factors such as Merthyr's housing stock, which is largely terraced and as such produces far less garden waste, and its residual containment system in 240L as opposed to Denbighshire's 140L bin.
- 4.2 Looking at the best performing English authorities, fortnightly refuse with smaller (140 or 180 litre) bins is operated by 48% of the 25 best performers, whereas only 7% of all English authorities use this approach. 92% collect food waste, with only 51% of all English authorities doing the same. These two factors represent the most significant variables affecting performance and are clearly reflected in the Collections Blueprint.
- 4.3 Variation in performance can also be attributed to variation in accuracy and conventions in recording of data, and also differences in non-kerbside collection waste. Household Waste Recycling Centre performance varies in Wales from sites averaging low 30% to those in the high 80%. This can be attributed to the range of materials targeted, quantities of garden waste, management process, manpower levels and policy on segregation of waste entering the sites.
- 4.4 Similarly, commercial waste services vary considerably between authorities. The calculation method for the recycling rate means authorities that happen to have a large commercial waste service are likely to have a lower recycling rate, whilst an authority that has tried to discourage take up of its commercial waste service will achieve higher recycling rates.

#### **5. In conclusion**

- 5.1 Adoption of the Collections Blueprint across all Welsh local authorities would lead to substantial environmental and economic benefits, as well as job creation within local communities. There is more that the Welsh Government could do to promote the take-up of the Blueprint. An obvious approach would be the delivery of funding programmes that are more clearly aligned with the adoption of the Blueprint, but in particular support should be provided to ensure that change from one system to another is as effective and painless as possible for authorities that do adopt the Blueprint. Ensuring that recycling data takes proper account of the end destination of material, the amount actually recycled and its quality will also encourage authorities to adopt a greater degree of separate collection.
- 5.2 Performance differences will always exist to some extent due to demographics and waste composition. However, these are likely to reduce when authorities adopt more similar collection systems and the achievement of high recycling performance levels becomes more widespread.

## **Inquiry into recycling in Wales**

- [View the background to this consultation](#)
- [View all current consultations](#)

## **Purpose of the consultation**

The National Assembly for Wales' [Environment and Sustainability Committee](#) is undertaking an inquiry into **Recycling in Wales**.

The purpose of this inquiry is to explore current local authority household waste recycling practice and arrangements across Wales. The inquiry will look at all waste materials, including food and garden waste.

### **Bryson Recycling response to consultation**

Bryson Recycling is a social enterprise based in Northern Ireland. We carry out kerbside sort recycling services to 170,000 houses, and operate a materials recovery facility to service a further 350,000 houses. We are the leading provider of household recycling services in Northern Ireland and are the largest social enterprise in this field in the UK.

Bryson Recycling has helped advise the Welsh Government in the recent past, and has always been keen to share information openly. While our kerbside services are based outside of Wales, the issues we face have a lot in common.

Our approach is to maintain an open mind to how recycling should be carried out, and focus on the approach that is most likely to result in best environmental and social outcomes. I would like to make the following observations on the final question posed on the consultation web page as it is most relevant to our experience.

- Gain greater understanding of the relationship between recycling collection practice and recycling rates.

There are a number of areas that I would like to comment on.

#### **Effectiveness of the recycling collection systems**

Our experience is that that like for like, the public prefer wheelie bins to boxes and bags because they are easier to use. It would appear from trials of the new wheelie boxes, that their popularity (backed up by their level of usage), is equivalent to a wheelie bin. All being

equal we have found that the use of standard boxes leads to a differential of about 8% between the approaches, this includes taking into account the 'first level' of contamination (from disposal rates at the MRF). This is not by any means the whole picture, and please note comments in the section 'hidden factors within comingling' and 'the Welsh blueprint'. It is important to acknowledge the fact that there appears to be a discrepancy, and some of the factors that account for it.

We have found that we yield relatively more paper and cardboard from comingled collections and more plastics, cans and glass from the kerbsort operations. Large card is undoubtedly easier to recycle in comingled collections. The differences in the other materials are harder to explain and could be the subject of further investigation.

The limiting factor for the MRF however is the acceptance of glass and a more complex mix of materials. Other MRFs purport to take a much wider range of materials than the Bryson facility, but we have found that despite years of concentrating very hard on quality outputs, that our ability to meet UK specification for key items such as paper is marginal. At present our MRF is glass free, and we believe that the idea of adding glass would tip our quality over the edge and result in us being entirely dependent on the export market. There is a simple principle, that the more materials we add to the single stream mix, the more complex the sorting process becomes and the greater risk of low quality materials.

We also know from our close relationship with the UK reprocessing industry that they have increasingly struggled with the quality of materials coming from MRFs in recent years.

#### Hidden factors within comingling

Our view is that Waste Data Flow (WDF) inherently undercounts contamination and gives makes comingling systems appear better than the end result actually warrants. For example:

- Most comingling systems also collect commercial materials at the same time. While this is probably a good thing for practical reasons, it does not help when comparing the results from different systems. Commercial recyclables can still be collected in a kerbsort area, just differently. If WDF figures are used to compare systems, some allowance should be made for this factor.
- Process residues from reprocessors are not taken into account. When a tonne of paper is sent to a mill for pulping, no account is made in WDF of the degree of contamination in the paper, so a load with no contamination will count for the same as a load with say 7% contamination. What is worse, is that for every percentage point of contamination, a further 2 - 3% of pulp may be removed with the contamination. This would be experienced as a piece of plastic film for instance, covered in paper pulp weighing two, three or four times heavier than the original piece of plastic.

When the MRF regs come into action in October, it should be possible to remove the weight of contamination within bales of material from the reported recycling figure, as they will be recorded in the process.

- Dealing with MRF residues. The 'out-throws' from MRFs are often moved from MRF to MRF for further sorting. A facility may record this as a material in their figures rather than as a waste product, leading to under-reporting of waste generated from MRFs. This is a matter that should be considered when applying the MRF regs.

### The Bryson model

We completely concur with the Welsh Government that the best way to achieve high levels of recycling and the best social, environmental and economic outcomes, will be through a form of kerbsort recycling. What is now emerging, from two Northern Irish trials is a very interesting model that manages to achieve the key policy objectives of the Welsh Government.

I have attached a presentation that gives details of a key trial to 4000 houses in Newtownabbey NI. Please note that this is being independently evaluated by Wrap at present, and the results I state below are provisional.

In summary however, we carried out the following:

- Weekly collection for recyclables using the new wheelie boxes (trollibocs in Conwy) collecting a very wide range of recyclables including plastic bottles, pots tubs and trays, cardboard and cartons.
- Fortnightly collected residual waste wheelie bins reduced from 240 to 180 litres

The general principle is that if you provide people with the best possible recycling system, it is possible to reduce residual waste capacity, and save money on both disposal and collection costs while maintaining very high levels of satisfaction. We have not yet trialled the approach in an existing comingled area, and this is an area we would like to investigate.

Provisional results from the trial are indicating that with no other changes and using a control, recycling levels increased by 25%, residual waste decreased by 25% and waste arisings appear to have dropped by around 8%. Participation increased by 15% points. A postal questionnaire to all resulted in 35% of the 4000 houses responding. 98% said they were happy, very happy or neither happy or unhappy with the kerbside service, and 93% said they were happy, very happy or neither happy or unhappy with the new container. These provisional results showed that recycling rates from materials collected from the household only, (residual 'black bag' waste, composting and dry recycling collected from households), increased from 45% to 55%.

It is interesting to compare the results of an earlier trial in Castlereagh NI, where 850 houses were also given wheelie boxes. In this case, there was no change to the residual waste collection provision. Tonnages increased by 10%, participation by 13% points, and 40% of householders responded to the survey, giving an approval rating of 94%.

Our own modelling would show that the cost of this model, in the case of Newtownabbey would make a modest saving of around £2-3 per house per year. The Council could chose to



collect residual waste in the existing 240l containers and collect every three weeks. This should have a similar, possibly better, impact on recycling rates, as residual capacity is 80 litres per week rather than 90 litres. It would also save the cost of the residual bin change, and make direct savings on residual collection costs. We estimate that this would improve savings by a further £5.50 per house per year, giving an approximate saving of £280k per year from an authority of just 36000 houses. Note that these are our own figures, and not those of the Council. Wrap are carrying out an independent economic appraisal of the option and this information will be released in due course.

It is clear at this stage that it is feasible to make substantial savings in the system as a whole, keep householders relatively happy, and increase recycling rates substantially.

It is noticeable from the slides attached that the comparison with other local authorities some of whom operate comingled systems, shows the Newtownabbey trial results (extrapolated across the borough) significantly outperforming all other approaches. It is worth noticing that most of the other councils do not yet collect glass from the household, so the addition of this by any means would improve their figures substantially, however our calculations show that even if they do collect glass, the results are likely to be very similar to the wheelie box if residual waste were treated in the same way. The difference though is that while the data may appear to be similar, the risk of restricting residual capacity at the same time can only exacerbate quality issues at the MRF.

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Alun Ffred Jones AM  
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04 July 2014

Dear Mr Jones

### Natural Resources Wales evidence on 5 June 2014 as part of the Public Forestry Estate in Wales inquiry

I am writing to you following the Committee's evidence sessions on 5 June to provide further information in relation to points raised by other witnesses where there was not an opportunity for us to reply during our evidence.

#### 1. Replanting and new planting – Para's 23-31

There seemed to be some confusion about the amount, standards and specifications for new woodland creation and replanting programmes in recent years.

- Total new planting in Wales in the timeframe referred to by Mr Adkins is stated as '200ha of new planting over the last five years'. The first release of the 2014 edition of 'Forestry Facts and Figures' show that the new area planted between March 31<sup>st</sup> 2013-14 was 900 hectares with 100ha of conifer and 800ha of broadleaf. Total new planting over the five year period 2009-2014 totals 3300 ha.
- Restocking across all woodlands during the period March 31<sup>st</sup> 2013-14 comprised 64% conifer and 36% broadleaf species.
- Where felling approval is given subject to restocking the UK Forestry Standard (UKFS) requires that forest composition be no more than 75% of a single species and that a minimum of 10% open space, 10% of other species or open ground and 5% native broadleaves trees or shrubs be incorporated. These are the minimum thresholds to be achieved at a forest management plan level. .
- Where an owner voluntarily enters into the UK Woodland Assurance Scheme the Standard requires particular thresholds to be met by site type, woodland size and location and is either complementary to the UKFS or exceeds its requirements.
- Where replanting is RDP grant aided then any contract under Glastir Woodland Management will require that any support for replanting meets the objectives and specifications set by Welsh Government as part of that scheme.

- Regarding figures relating to the replanting programme on the Welsh Government Woodland Estate (WGWE) and the timeframe of terms of the inquiry we refer you to section 3.5.1 and 3.5.2 in our written evidence.

## 2. Broadleaf conifer mix - Para 30

Mr Harvey mentioned the loss of productive woodlands and that existing conifer planting has fallen by about 17000ha. Table 1 shows that over the period referred to by Mr Harvey there has been a downward trend in coniferous woodland area but not of the magnitude cited. Please note that this period includes an updated National Forest Inventory including improvements in mapping and recording and an associated increase of land recorded as woodland of around 21000ha.

**Table 1 - Changes in the broadleaf conifer mix 2004 – 2014** (from Forestry Facts and Figures June 2014)

2004			2014		
<b>WGWE</b>			<b>WGWE</b>		
Broadleaves	11,000ha	10%	Broadleaves	19,000ha	16%
Conifer	98,000ha	90%	Conifer	98,000ha	84%
<b>All woodland in Wales</b>			<b>All woodland in Wales</b>		
Broadleaves	123,000ha	43%	Broadleaves	156,000ha	50%
Conifer	162,000ha	57%	Conifer	150,000ha	50%

## 3. Performance to Welsh Government *Phytophthora ramorum* Disease Management Strategy – Para’s 39-53; 110-116; 254-274; 348-355

*Para’s 39-53 and 116*

There are several references to slow or non-compliance with Statutory Plant Health Notices (SPHNs) issued for the WGWE. It is further inferred that this resulted in the spread and severity of the disease. We strongly refute these statements and for an explanation of *Phytophthora ramorum* disease management in Wales we refer you to section 5 of our written evidence for a summary of the management of the disease from 2010. Further **Table 2** shows the number of SPHNs issued by NRW on the WGWE and private sector woodlands in 2013-14.

**Table 2 - Statutory Plant Health Notices (SPHNs) issued 2013-14**

	No. Issued	Area Issued	Area Completed	Area not Completed	Area Rescinded
WGWE	205	2 985ha	462ha (16%)	660ha (22%)	1 863ha (62%)
Private	56	727ha	44ha (6%)	483ha (66%)	200ha (28%)
Total	261	3 712ha	506ha (14%)	1 143ha (31%)	2 063ha (55%)

All areas in hectares (ha)

The 'Area Rescinded' column shows the area initially served with SPHNs but which subsequently fell within the Core Disease Zone (CDZ) under the revised Welsh Government *Phytophthora ramorum* Disease Management Strategy in December 2013. The initial SPHNs are now replaced with movement SPHNs (SPHN[m]s), which do not require time-bounded clearfelling allowing focus on the leading edge of the infection.

#### *Para's 254-274*

Mr Bronwin states that "... it had to create this core disease area...." This is an incorrect assertion, repeated during evidence, in that the *Phytophthora ramorum* Disease Management Strategy is a Welsh Government, rather than Natural Resources Wales, strategy. Owners and managers of woodland including Natural Resources Wales were involved in Welsh Government's preparation of this Strategy and forest owners and managers, including Natural Resources Wales, are now responding to it. The assertion in para's 254, 256 and 268 that the Welsh Government *Phytophthora ramorum* Disease Management Strategy Core Disease Zone was declared as a matter of expediency in the management of the disease incidence on the WGWE is incorrect and we understand that it was most certainly based on an appropriate response to the best available evidence and advice.

#### *Para's 348 to 355*

Antoinette Sandbach AM said that '... scientific advice was that having a core disease area ... would inevitably result in a far greater spread into the private sector.' This is inaccurate. It is important to understand that the disease has spread rapidly and being new to larch the dynamics of disease are not fully understood. Modellers at Cambridge University have shown that the most effective way of targeting resources is to concentrate action at the leading edges of the disease. The climatic susceptibility map (presented at annex 4 in our written evidence) show that the western seaboard of the UK is particularly susceptible, and this is mirrored in the confirmed locations in Wales, England, Scotland and Northern Ireland. The spread has been particularly rapid in Scotland, where some 7000-8000 hectares of larch are infected.

#### **4. Regulation of forestry - Para's 110-116; 164; 254-276; 274-293**

##### *Para 164*

Mr Bishop makes reference to '... eco-management and a catchment area ...' thresholds for clearfelling. We wish to point out that this is a requirement of the UK Forestry Standard and the implementation of the Forests and Water Guidelines 2011 where there are best practice requirements for managing forests in acid sensitive catchments (we reference this in our written evidence at section 4.3.3). The implementation of these requirements is not as a result of the creation of Natural Resources Wales. Confor, along with other stakeholders, were involved in the recent development of the Practice Guide 'Managing forests in acid sensitive catchments' (awaiting publication).

##### *Para's 110-116 and 254-276*

There are several references to a lack of even-handedness in our regulation relating to the implementation of the Welsh Government *Phytophthora ramorum* Disease Management

Strategy and, more broadly, as the body responsible for regulating forestry and as manager of the WGWE. We wish to make it clear that there is no discrimination in the level of regulation employed to achieve delivery to that Strategy nor in the broader regulation of forestry matters. There has been no change in our enforcement policy nor procedures that substantiates any of the points made by witnesses. Any inference that crown exemption from felling licences is a material factor in our performance against SPHNs or any other matter connected to the management of the WGWE is both mis-leading and inaccurate.

The Natural Resources Body for Wales Establishment Order 2012 states that we are not a Crown Body and we do not have Crown immunity. The WGWE, however, is classed as Crown land as legal title to the land remains with a Crown Body, namely the Welsh Government. S33 of the Forestry Act 1967 provides that the statutory requirement to obtain a felling licence does not apply to Crown land. The exemption to the general requirement for a felling licence therefore attaches to the land upon which the timber is growing rather than the party putting forward the proposal i.e. if the land is classed as Crown land, it is exempt. If we were looking to fell trees on land owned by us (i.e. land that is not part of the WGWE) the exemption would not apply and we would be required to obtain a felling licence.

We wish to reassure the Committee that we manage the WGWE to the same principles and standards as any other woodland owner and operate to a full suite of well established policy, procedures and protocols in including appropriate levels of management, supervision, monitoring and review.

#### *Para's 114, 274-293*

We refute the statements that we do not apply the same rules to ourselves (para 114 and 282), give ourselves an 'unfair market advantage' (para 286) through self-regulation, the unequal regulation of 'competitors' (para's 274 and 282) and the statement at para 288 where Mr Edwards states that we are '...not necessarily doing it to deliberately corrupt the market ..' but that '.. it is a fact'. There is no evidence to substantiate these points.

#### **5. UK forestry expertise – Para's 157-158**

Mr Whitfield said that interaction with the Forestry Commission has reduced following the creation of Natural Resources Wales. We wish to assure the Committee that this is not the case and, beyond our Shared Services and Co-operation Agreement with Forestry Commission and Forest Research, staff have regular interaction with, and actively contribute to, UK expertise on forestry matters. Indeed soon after vesting we hosted a meeting of Forestry Commission Scotland's Management Board and through a well-received field visit to exchange ideas on country approaches to Integrated Natural Resource Management.

#### **6. Accountability and advocacy for forestry – Para's 276-277**

Mr Bronwin stated that there is a lack of forestry expertise within Natural Resources Wales at Board level and Mr Edwards said there is a lack of accountability for forestry. The appointment of the Board of Non-Executive Directors was made according to the basis set out in The Natural Resources Body for Wales Establishment Order 2012 and individuals do not represent any sector or personal interest.

### **7. Increase of woodland cover by 100000 hectares - Para 332**

Mr Owen makes reference to the WGs climate change and forestry policy aspiration to take woodland cover in Wales from 14% to 20%. This would be a 6% increase and not 4% as stated – and it is 6% of land that would be converted from a predominantly agricultural land use.

### **8. Reference to ‘significant institutional changes’ – Para’s 416-417**

We refer you to correspondence sent on the matter on 16<sup>th</sup> June. We do not in any way infer that the UKFPA has failed to effectively represent the interests of its members in Wales.

### **9. References to grants for woodland management and creation – para’s 24, 179, 185**

There are several references to grants for woodland management and creation being delivered by Natural Resources Wales and to our policies. We would like to take the opportunity to emphasise that Glastir Woodland Element (woodland creation and management grants) is administered by Welsh Government to deliver against Welsh Government policy.

I hope that this provides you with the further information that you were seeking. If you need any clarification on any of these issues, please do not hesitate to contact me.

Yours sincerely

**Ceri Davies**  
**Executive Director for Knowledge, Strategy and Planning**



FAO, Alun Ffred Jones,  
Chair Environment and Sustainability Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA  
July 8th 2014

AlunFfred.Jones@wales.gov.uk

Dear Sir,

We thank you very much for the opportunity to submit evidence both physical and oral to the Environment and Sustainability Committee Inquiry into the Public Forestry Estate in Wales of June 5<sup>th</sup> 2014

I have for some while been digesting the transcript of the inquiry and remain both concerned and confused over one item.

In their response to the question from yourself, "in terms of this aspect of cutting down trees and selling them, does NRW make a profit on that business?" NRW made the reply, "On the work that is done, we make a profit, certainly. To give you an example, in 2012-13, the income per tonne was around £18. Our costs were around £7.30 a tonne,"

We remain concerned over this point as we do not recognise these figures as an accurate reflection of the costs of harvesting and selling timber. Our organisation has many companies working in this field and the considerable knowledge of our members would indicate that these figures are not the true picture.

The table below gives our understanding of the published data and we believe underlines our concerns that the data published is insufficient to make an assessment of the performance of FCW/NRW

Finances		
£13.485m	income for sales of timber and forest products,	FCW annual accounts 2012-2013
£9.9m	costs of harvesting and haulage	Forestry Statistics 2012-2013
£3.585m	Profit	
Volumes		
810032	CU M harvested	FCW annual accounts 2012-2013
675026	Total Tons harvested @ 1.20cu m/ton	
333604	Tons harvested as direct production @ 1.2cu m/ton	
	Our assumptions	
£5.31	Income per ton based on figures above	Profit/Total tons harvested
£14.66	Costs per ton of harvesting & haulage	On total harvested volume
£29.67	Costs per ton of harvesting & haulage	On direct production only

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Confederation of Forest Industries (UK) Ltd. Registered office: 59 George Street, Edinburgh EH2 2JG





# Confor

Promoting forestry and wood  
Hyrwyddo coedwigaeth a choed

Whilst we appreciate that the figures quoted for “costs” in the NRW response may include other expenses not associated with harvesting and haulage and which may not be directly comparable to the private sector, the difference is large enough to give us concerns the published sale results we know do not contain all the information but if we are to believe the £7.30 figure we are concerned that the unpublished data may show a different picture.

Indeed in the “Wales sale results” on FC website the differences between timber sold standing and the timber sold at roadside is in the region of £15.00 to £19.00 which is the harvesting costs.

We are concerned that the £7.30 and £18 figures quoted by NRW may give the committee a false impression and we reiterate our call for transparency, the committee, Confor members, the forest and timber sector and the general public need to know the facts in a format that we can understand and benchmark against the private sector, only then can we make an informed judgement.

We look forward to your response and would be available for further comment if required.

Martin Bishop,

Confor National Manger for Wales

Confor Wales Committee

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## Davidson, Alun (Assembly – Policy & Leg Cttee Service)

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**From:** Luxton, Katie-Jo <katie-jo.luxton@rspb.org.uk>  
**Sent:** 11 July 2014 12:49  
**To:** Jones, Alun Ffred (Assembly Member)  
**Cc:** Davidson, Alun (Assembly – Policy & Leg Cttee Service); Cropper, Laura  
**Subject:** Sus Committee report on biodiversity

Dear Alun F fred

### Sustainability Committee (Third Assembly) report on Biodiversity

At the Committee meeting on the State of Nature report on 21<sup>st</sup> May, I committed to provide further information regarding my assessment of progress against the recommendations made by the Sustainability Committee in its Inquiry into Biodiversity in January 2011. Apologies that this has taken a few weeks to come through to you.

As a member of a member of the Wales Biodiversity Strategy Board I would hope that I have a reasonable understanding of the programme of activity under this work area and therefore made the assessment from my general understanding of the progress made on tackling biodiversity declines. As I outlined at the session, there are a number of areas where it is not clear whether action has been taken by Government. Of the 19 recommendations made by the Committee in the previous Assembly, 16 were accepted in whole, part or principle by the Government

- 8 recommendations which to my knowledge have not been completed (Numbers 2,3,4,10,12,13,18,19)
- 2 where it is not clear whether there has been progress and if so how it can be measured (1,8)
- 4 where there has been some progress (5,7,14,17)
- 2 have been completed (6,11)

For further clarity, I would encourage the Committee to seek further information from the Welsh Government as to their view of the progress against these recommendations.

Kind regards

Katie-jo  
Director, RSPB Cymru

**Katie-jo Luxton**  
Cyfarwyddwraig/Director RSPB Cymru

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**Gadewch inni roi cartref i natur yng Nghymru**  
**Let's give nature a home in Wales**



Mae RSPB Cymru'n rhan o'r RSPB, elusen fywyd gwyllt fwyaf y DU, yn ysbrydoli pawb i roi cartref i fyd natur. Ynghyd â'n partneriaid, rydym yn gwarchod adar a bywyd gwyllt sydd mewn perygl fel bod ein trefi, ein harfordir a'n oefn gwlad yn fwrwm o fywyd unwaith eto. Mae gennym hefyd brif ran o fewn BirdLife International, partneriaeth fyd-eang o gyrrif cadwraeth natur.



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref  
Ein cyf/Our ref

Alun Ffred Jones AM  
Chair  
Environment and Sustainability Committee

[ES.comm@wales.gov.uk](mailto:ES.comm@wales.gov.uk)

10 July 2014

Dear Alun

I am writing to you regarding the Environment and Sustainability Committee general evidence session meeting that the former Minister for Natural Resources and Food was due to attend on 23 July at the Royal Welsh Show.

My understanding is that the session was to cover aspects that now fall to the Minister for Natural Resources, Culture and Sport, Deputy Minister for Agriculture and Fisheries and I and that written evidence was due to be submitted today.

Unfortunately, the Minister and I both have other commitments on 23 July and are unable to attend the meeting. In addition, given the timing of these changes in portfolio responsibilities, we are not in a position to submit evidence at this stage and believe it might be more appropriate to reschedule the session for after summer recess.

# Agenda Item 8

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# Agenda Item 9

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# Agenda Item 10

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# Agenda Item 11

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## LEGISLATIVE CONSENT MEMORANDUM

### INFRASTRUCTURE BILL PROVISIONS FOR THE CONTROL OF INVASIVE NON-NATIVE SPECIES

1. This Legislative Consent Memorandum is laid under Standing Order (“SO”) 29.2 SO 29 prescribes that a Legislative Consent Memorandum must be laid, and a Legislative Consent Motion may be tabled, before the National Assembly for Wales if a UK Parliamentary Bill makes provision in relation to Wales for a purpose that falls within, or modifies the legislative competence of the National Assembly.
2. The Infrastructure Bill (the “Bill”) was introduced in the House of Lords on 5 June 2014. The Bill can be found at:  
<http://services.parliament.uk/bills/2014-15/infrastructure.html>.

#### Summary of the Bill and its Policy Objectives

3. The Bill is sponsored by the Department for Transport. The UK Government’s policy objectives for the Bill are to bolster investment in infrastructure by allowing stable long term funding, deliver better value for money and relieve unnecessary administrative pressures. The Bill aims to increase transparency of information provision and improve planning processes.
4. The Bill is in 5 Parts:
  - Part 1 and Schedules 1 to 3 make provision for the appointment of “strategic highway companies” to manage strategic roads in England in place of the Highways Agency.
  - Part 2 makes provision for the control of invasive non-native species through species control agreements and orders and related matters.
  - Part 3 makes provision about Nationally Significant Infrastructure Projects, deemed discharge of planning conditions and about the Homes and Communities Agency and other bodies. That Part together with Schedule 4 also provides for Land Registry to assume responsibility for the registration of local land charges and to have wider powers to provide information and register services relating to land and other property.
  - Part 4 and Schedule 5 make provision about a community electricity right which, if exercised, will give individuals resident in a community, or groups connected with a community, the right to buy a stake in a renewable electricity development in or adjacent to the community.
  - Part 5 contains general provisions that apply to the Bill as a whole.

#### Provisions in the Bill for which consent is sought

##### Part 2, Clause 16: Invasive Non-native Species

5. Part 2, Clause 16 inserts a new subsection 14(4A) in the Wildlife and Countryside Act 1981 (“the 1981 Act”) providing for measures relating to

species control agreements and species control orders to be contained in a new Schedule 9A to the 1981 Act.

6. Clause 16 will, if made law, allow certain environmental authorities to take action to eradicate or control invasive non-native species (“INNS”) that pose serious threats to biodiversity, other environmental interests or social or economic interests.
7. The provisions are based on a Law Commission report “Wildlife Law, Control of Invasive Species”, printed on 10 February 2014:  
<http://lawcommission.justice.gov.uk/publications/2612.htm>
8. The provisions of Schedule 9A are summarised below:
  - The “environmental authority” in Wales, that is Natural Resources Wales or the Welsh Ministers, may enter into an agreement, a species control agreement, with an owner of any premises where an INNS is considered to be present. The agreement will set out operations required to be carried out to address INNS and may specify payments to be made to cover costs of the operations.
  - Before issuing an agreement the environmental authority must consider the proportionality of a proposed agreement.
  - If, after 42 days no agreement is reached, an owner refuses to enter an agreement, the terms of an agreement have not been adhered to, or no owner has been identified in relation to the premises, the environmental authority may then issue a species control order;
  - In exceptional circumstances, the environmental authority may issue a species control order in an emergency without first offering a species control agreement;
  - Before making an order the environmental authority must consider the proportionality of the proposed order;
  - An order must state that an owner is required to take action to eradicate, control or prevent INNS, or that an environmental authority proposes to do so, or, in certain cases, both.
  - Only the Welsh Ministers in Wales (and the Secretary of State in England) may make an agreement or order that relates to premises that consist of a dwelling.
  - An appeal may be made by the owner of the affected premises to the First-tier Tribunal (Environment).
  - If an order is not complied with, the environmental authority will have the powers to carry out the operations themselves.
  - Failure to comply with an order, without reasonable excuse, or intentionally obstructing a person from carrying out an operation required or proposed under an order, will be an offence.
  - Powers of entry are provided in relation to the determination, inspection and enforcement of agreements and orders. In certain circumstances, described in paragraph 20(1), entry to premises must be authorised by warrant.
  - Compensation may be payable to the landowner in respect of financial loss.

- The Welsh Ministers must issue a code of practice concerning the application and scope of species control agreements and orders. The Welsh Ministers must consult with Natural Resources Wales before issuing, revising or replacing the code, and the code must be appropriately published.
9. The policy intention is that these powers should be used in exceptional circumstances where a voluntary approach cannot be agreed and there is a clear and significant threat from inaction. It is intended that they will be used primarily to support national eradication programmes; the routine use of these powers for widespread species, such as Japanese knotweed, would generally be considered inappropriate
  10. The provisions include the following powers for the Welsh Ministers to make subordinate legislation:
    - Power to make species control orders,
    - A duty to issue a code of practice concerning the application and scope of species control agreements and orders.
  11. The Welsh Ministers' power to make species control orders is not subject to any Assembly procedure.
  12. A copy of the Welsh Ministers' code of practice must be laid before the National Assembly for Wales. No further Assembly procedure is specified.
  13. It is the view of the Welsh Government that these provisions fall within the legislative competence of the National Assembly for Wales in so far as they relate to biodiversity and environmental protection (both under paragraph 6), water quality (under paragraph 19), agriculture (under paragraph 1), economic development (under paragraph 4), and the promotion of health (under paragraph 9) under Part 1 of Schedule 7 to the Government of Wales Act 2006.

### **Advantages of utilising this Bill rather than Assembly legislation**

14. INNS pose serious threats to biodiversity, the water environment, economic prosperity, human health and welfare. The economic impact in the UK alone has recently been estimated as a minimum of £1.8 billion per annum which includes £1 billion to the agriculture and horticulture sectors and over £200m to the construction, development and infrastructure sectors. Early eradication is critical to tackling INNS. As INNS do not respect borders, Wales collaborates with the remainder of the UK to ensure the most effective control of INNS across Great Britain.
15. The Law Commission proposed an approach to species control agreements and orders for Wales and England which is similar to that currently operated in Scotland. The provision for the control of invasive non-native species model which is set out in the Bill is largely drawn from the Law Commission's recommendation.

16. A key component of the draft European Union Regulation on the prevention and management of the introduction and spread of invasive alien species (“the EU Regulation”) that is proposed to come into force on 1 January 2015, subject to being examined by the Council and the Parliament, is that Member States should take measures to eradicate newly arrived species of EU concern within three months of their detection. The lack of these powers places us in a vulnerable position in terms of biosecurity and may undermine our ability to meet our future obligations under the EU Regulation. The proposed Regulation will shortly be examined by the Council and the Parliament. It is expected that the proposed Regulation will be approved but the Council’s and Parliament’s final decision is unknown at the time of drafting this memorandum.
17. There is urgency to introduce this specific Law Commission proposal to control INNS as they have an adverse impact on human health and welfare, the water environment, biodiversity and a high economic cost. In addition, the introduction of species control agreements and orders may assist in meeting key elements of the EU Regulation. It is therefore the view of the Welsh Government that it is appropriate to deal with these provisions in the Bill as it represents the most timely, practicable and proportionate legislative vehicle to enable these provisions to apply in relation to Wales.

### **Financial implications**

18. It is intended that the powers will be used primarily during national or regional eradication programmes after a voluntary approach has failed. National or regional eradication programmes are usually funded by government. However, in Wales there are no dedicated funds for invasive non-native species so resources and budgets would need to be assessed on a case by case basis. In situations where a landowner is responsible for the release of an invasive species it is expected that the landowner would be accountable for costs. The powers will enable action to be taken at an early stage and hence are designed to reduce the spiralling costs to the economy associated with on-going control of invasive species as well as protecting our native biodiversity.

**Alun Davies AM**  
**Minister for Natural Resources and Food**  
**June 2014**