



## **Landfill Disposals Tax (Wales) Bill consultation**

### **The British Heart Foundation and the re-use sector in Wales**

Every month almost 800 people lose their lives to Cardiovascular Disease in Wales, and from that number more than 200 are under 75. The British Heart Foundation is working hard across Wales to raise funds for our [life saving research](#) (eg the Wales Heart Research Institute at Cardiff University), support people living with [heart disease](#), and to reduce the [heart health risks](#) of future generations.

The charity's work is partly funded from sales of re-useable goods in our 29 shops and 8 dedicated furniture and electrical stores in Wales. We estimate that we directly reuse at least 3600 tonnes of furniture, electrical items, textiles, bric-a-brac, toys, books and media (CDs, DVDs etc) per annum through our shops and stores in Wales. In addition to this we send a significant tonnage of goods for reuse or recycling by third parties. We deliver services at little or no cost to local authorities, which include regular kerbside collection of smaller reusable items commonly not included in municipal recycling (eg bric-a-brac, textiles, toys, media), free on request collection of a full range of items including furniture and electrical in most areas.

We are part of a wider re-use sector across Wales, which includes an estimated 587 charity shops (*Analysis & Mapping of the Re-use Sector in Wales, WRAP (2015)*). Collectively we re-use and prevent thousands of tonnes of potential waste, including furniture, electrical items and textiles, which have been identified by the Welsh Government as priority materials. In the process we create thousands of jobs and volunteering opportunities, and provide affordable goods to people in need, eg through referrals from housing associations. All this is in addition to core charitable work which contributes to Wales' Well-being Goals, eg health, global responsibility, cohesive communities.

### **Landfill Disposals Tax Communities Scheme**

The proposals set out on the new Landfill Disposals Tax, including the Communities Scheme, are on the whole fairer and more efficient methods of raising and distributing the tax in comparison to the existing system. The LDT Communities Scheme proposals in particular provide for a transparent grant funding mechanism administered in such a way that grant awards are objective and support a balance of project deliverables. This is a welcome development in contrast to the un-coordinated and overly complex delegated system of environmental bodies reporting to landfill operators.

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The specific inclusion of 'prevention, re-use, recovery and recycling of waste' as an objective of the scheme is a logical link to the impact of landfill. It reflects the success of previous Landfill Tax funding in initiating recycling projects across Wales at a time when the industry was in its infancy. While recycling is now mainstream and a statutory duty of local authorities, there remains considerable potential to divert re-useable items from landfill and other disposal routes.

However in relation to re-use and prevention of waste the current proposal has a significant drawback – the geographical restriction to projects within 5 miles of relevant sites. While this may be a reasonable restriction for biodiversity and environmental enhancement projects mitigating local impacts, it is not relevant or practical for waste prevention.

Waste prevention and re-use covers a wide range of activities and communications carried out at local, regional and national levels. It could in theory include product design and other issues, but looking specifically at the diversion of waste through repair and re-use what this generally means is increasing the supply of useable goods to meet the demand of the sector. There is a robust re-use sector with capacity to put more items back into circulation – whether they are deemed waste because they have been presented to a local authority for disposal (re-use) or whether they are deemed second hand goods because they have been presented directly to a charity (prevention).

This sector does not generally require any funding to run its local operations – on the contrary it generates a surplus for the charities involved – and is therefore unlikely to require LDT Communities Scheme funding for specific locations.

Where the re-use sector might be able to make use of development funding would be to support communications and joint working. We have infrastructure, we have markets and we have capacity between us. What we don't have is coordinated messaging to the public or collaborative mechanisms to standardise what we offer. In Scotland for instance there is the Community Re-use Network Scotland as a forum for all re-use organisations, the National Re-use Line as a single point of contact for residents and the Revolve Standard as a quality assurance mark recognised nationally.

There may well be useful projects developed at a local level, including the large areas highlighted in the consultation document, but there is considerably more potential to use limited funds to deliver national projects. A communications campaign for all South Wales local authorities for instance which excluded those areas more than 5 miles from a landfill site would be impossible to deliver. A North Wales partnership which excluded those few urban areas not highlighted on the map would be impractical.

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All of Wales' residents contribute in some way to the continuing disposal of waste. If the LDT Communities Fund is to encourage the prevention of this waste it needs to be applied at the appropriate level. We would therefore suggest that waste prevention and re-use is exempted from the geographic exclusion if applications for funding can demonstrate that a regional or national project would be appropriate.

A handwritten signature in black ink, appearing to read "DR", followed by a long horizontal line extending to the right.

**David Roman**  
**Waste & Recycling Manager**

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