

Submission by Natural Resources Wales

1. Role of Natural Resources Wales

- 1.1 Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.
- 1.2 Natural Resources Wales is responsible for regulating the waste industry and is principal adviser to Welsh Government, adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources.
- 1.3 Natural Resources Wales is the designated monitoring authority for The Recycling, Preparation for Reuse and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011 and Landfill Allowances Scheme (Wales) Regulations 2004.
- 1.4 We also work with others to provide increased market confidence in the quality of products made from waste and so encourage greater recovery and recycling, for example through the development of quality protocols.
- 1.5 Whilst Natural Resources Wales is the primary waste regulator in Wales the challenges and opportunities presented by waste are far bigger than we can deliver in isolation. Working with others including Welsh Government, WRAP Cymru, local authorities, public sector, third sector, waste producers and the waste industry makes sense in terms of shared ownership, resources, and outcomes achieving a better environment for the benefit of the communities we serve.

2. General comments in relation to the Auditor General for Wales waste management reports

- 2.1 Natural Resources Wales was consulted by the Auditor General in the drafting of the three reports, providing data and views where appropriate.
- 2.2 Natural Resources Wales are content with the factual accuracy of the references made to Natural Resources Wales in the three reports.

3. Comments in relation to specific findings

“Waste Infrastructure Procurement Programme being ‘well-managed’ but some councils who have opted out are still reliant on landfill”;

- 3.1 The role of Natural Resources Wales in the Waste Infrastructure Procurement Programme was limited to providing waste data and advice to Regional Waste Groups where required. We do not have a view on the management of the Waste Infrastructure Procurement Programme, however we provide the following comments in relation to Local Authorities reliance on landfill.

- 3.2 The Landfill Allowances Scheme (LAS) Wales was established through the Landfill Allowances Scheme (Wales) Regulations 2004 to meet the requirements of the European Council Landfill Directive. The purpose of the scheme is to ensure diversion of biodegradable municipal waste (BMW) from landfill. Reducing the amount of BMW waste going to landfill helps to cut greenhouse gas emissions, preventing the production and release of methane into the air from landfill sites.
- 3.3 Local Authorities must landfill less biodegradable waste than their allocated allowance each year up until 2020 to avoid being liable to a financial penalty from Welsh Ministers (£200 for each tonne of biodegradable waste landfilled over their allowance).
- 3.4 Natural Resources Wales role as the monitoring authority for the Landfill Allowances Scheme is to validate waste returns from Welsh local authorities and determine the amount of BMW sent to landfill by each local authority. Collectively, local authorities have made good progress in diverting BMW from landfill throughout the scheme. Wales has reduced the amount of biodegradable municipal waste (food, paper, and garden waste) sent to landfill by 88 per cent over the last thirteen full years of the Landfill Allowances Scheme. This clearly demonstrates work to reduce the amount of biodegradable waste being sent to landfill by Welsh local authorities has succeeded and that all local authorities have reduced their reliance on landfill as a waste management method.
- 3.5 General reasons for reductions in local authorities sending waste to landfill include:
- the Landfill Tax regime has changed the economics of landfilling waste. It is no longer a cheaper alternative to other waste management methods
 - changes in waste collection service provision;
 - changes in waste management practices and new/alternative technologies; for example, diversion of residual waste to incineration with energy recovery has had a significant effect on local authority performance for LAS in recent years;
 - public participation levels in recycling schemes;
- 3.6 Disposal of waste at Landfill is the least sustainable use of our resources. Although we are seeing a move away from landfill as a method of waste disposal, there will be occasions where the use of landfill will be an appropriate method of managing wastes. There are clear economic and environmental benefits from reducing the volume of waste sent to landfill. However, there will continue to be certain waste types for which landfill represents the best management option, for example, asbestos and there may also be times when landfill should be used as a contingency, or to address a temporary shortfall in capacity at more sustainable alternatives. The targets already in place should ensure that this is minimised

“Recycling being on the increase in Wales and methods being more consistent”;

- 3.7 Wales is the only UK country to have introduced statutory Local Authority Recovery Targets (LART). Natural Resources Wales is the monitoring authority for LART and as such, have statutory duties as specified in legislation. This includes the duty to check that all local authorities have submitted data in accordance with their obligations and reconcile any inaccurate or inconsistent data that has been submitted. In order for local authorities to demonstrate that they have met their targets, they are required to provide us with evidence that their diverted waste has met the relevant criteria. This places greater importance on Welsh local authorities to follow the waste flows of materials after they have been collected and to accurately report data on intermediate sorting facilities, reject rates and end destinations.

- 3.8 Natural Resources Wales works with local authorities to identify and report the end destinations of the waste that they collect, so that there is greater confidence that only materials actually recycled, prepared for re-use or composted are included in the calculation of their recovery rates.
- 3.9 2019-20 is the first year that the targets rise from 58% to 64%. Welsh local authorities must each achieve a recovery rate of 64% to avoid being liable for financial penalties (£200 per tonne under the target). The target will rise to 70% in 2024-25.
- 3.10 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 63% of waste collected by Welsh local authorities in 2017-18. Individually, 20 of the 22 local authorities in Wales met or exceeded the 58 per cent target in 2017-18.
- 3.11 The Welsh Government 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. Welsh Government offers all local authorities the opportunity to participate in a Collaborative Change Programme on the delivery of services. This programme aims to ensure that Wales meets the high recycling targets set out in Towards Zero Waste and follows the Collections Blueprint delivery model.
- 3.12 We aware that the costs of changing the type of recycling waste collection service can be considerable. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it takes 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).
- 3.13 Collecting waste in separate material streams produces high quality recyclates for end recycling markets. Higher quality material is likely to support the retention of material within the Welsh and UK economies, resulting in economic and social benefits. Recycling retains natural resources, reducing the demand for virgin material. This supports the objectives of the Well-Being of Future Generations (Wales) Act 2015, improves resilience to materials market downturns and reduces the risk associated with materials collected for recycling being disposed of or inappropriately managed.
- 3.14 The statutory Local Authority Recovery Targets increase up to 70% in 2024-25. If local authorities are to achieve the more challenging targets set in Towards Zero Waste, they must sustain the momentum of increasing preparation for re-use, recycling and composting. This sustained increase will be difficult for local authorities because many have already made most of the necessary physical changes by providing recycling facilities and offering enhanced waste management services. Smaller incremental changes are still possible, but most of the more significant changes are already in place. Evidence available suggests that there are considerable amounts of recyclable material still present within the household residual waste stream that can be diverted through behaviour changes at source (e.g. food waste).

- 3.15 The Industrial & Commercial waste survey 2012 and Construction & Demolition waste survey 2012 provided evidence that the business community accounts for over 80% of all the waste generated in Wales. People recycle waste at home and there is an expectation as well as a need to ensure that this behaviour becomes the 'norm' for society when outside of the home. The Industrial & Commercial Survey 2012 provided evidence that almost all commercial waste disposed of by landfill was classified as mixed waste indicating that there is further potential in the commercial sector to reduce municipal waste sent to landfill through improving segregation of recyclables at source. In addition, the 'Composition of Litter in Wales' WRAP Report 2018 provided evidence that the composition of waste placed in recycling street bins is contaminated and is similar to that of residual street bins. This indicates that current recycling 'on-the-go' infrastructure is not being utilised correctly and opportunities for increasing recycling are being missed.
- 3.16 Persuading more people to take part in recycling is a priority. Public participation in recycling is voluntary, with few incentives and fewer penalties. The challenge for the Welsh Government in partnership with local authorities is considerable, to increase understanding, confront perceptions and change the behaviour of householders. For example, there is still confusion on what types of materials are recyclable such as plastics. A householder requires clear, simple and consistent advice to remain engaged and understand the importance of participation. Moreover, this challenge comes at a time of sustained and mounting economic pressures for all.
- 3.17 Care must be taken to ensure that the drive to achieve the Local Authority Recovery Targets does not lead to perverse environmental and economic outcomes. For example, such issues could result, in part, from the lack of suitable alternative treatment facilities both within Wales and further afield. This could be exacerbated by the pace of high recycling targets not matching provision of waste facilities and local authorities not understanding the legitimate options open to them. Whilst we strongly support the principles of waste recovery and the clear benefits to the economy and environment of Wales from the appropriate recycling of wastes as a resource, this can only be in the context of wastes being managed appropriately, with necessary environmental safeguards.
- 3.18 The management of waste in the UK is a complicated matter. Waste is collected from householders and businesses located in Wales via different waste collection methods and is sent to facilities for storing, sorting and treatment throughout the UK prior to it being recycled or disposed. Potentially the same waste is transferred through multiple waste facilities and is bulked with waste from other origins such as England and Scotland. Whether waste is recycled in the UK or abroad will depend on several factors such as current UK reprocessor infrastructure and global market demand for the specific material type. It follows that waste originating from Wales may be exported abroad from Welsh and other UK ports.
- 3.19 The UK is a signatory to the Basel Convention on transboundary movements of waste. This has been put into European law by Regulation (EC) No 1013/2006. As environment is a devolved power, Natural Resources Wales is the competent authority for international waste movements that start, end or transit through Wales. Included in the convention are the various controls that are needed for the trans-boundary movements of waste.
- 3.20 'Green-list' waste must be destined for genuine waste recovery reprocessing in countries that have specifically told the European Commission (EC) that they want these wastes (and using only Article 18 controls). Once the waste has been exported, it is for the destination Competent Authority to decide whether they will accept them. If the Competent Authorities are not satisfied with the waste, then they have options available to them including repatriation of the waste to the exporting country. It is also for the competent authorities to ensure that the receiving waste recovery sites are operating to appropriate 'broadly equivalent' standards.

3.21 Waste and recycling must be properly managed whether it is processed at home or abroad and this remains a priority for Natural Resources Wales. We want to see further moves towards greater sustainability for all wastes. Wherever wastes are recycled, whether in the UK or abroad, it should only be done at sites operating in an environmentally sound manner. Material sent for recycling should be free of contamination and of suitable quality to be recycled at the destination it is sent.

“Greater emphasis needed on waste prevention”

3.22 In general, the total amount of local authority municipal waste generated has gradually decreased in Wales since the early 2000’s with some fluctuation in recent years. The total amount of waste generated in Wales decreased by 40 thousand tonnes in 2017-18, dropping to 1,550 compared to 1,590 thousand tonnes in 2016-17. Natural Resources Wales published survey results that estimated industrial & commercial waste generation was 3.7 million tonnes and construction and demolition waste generation was 3.4 million tonnes in Wales in 2012. Therefore, local authority municipal waste generation accounts for less than one fifth of the total waste generated in Wales.

3.23 Preventing waste from arising at all sources is the most sustainable use of our natural resources. Moving towards a circular economy will help to keep resources in service for as long as possible, maximising their value when in use and then, when no longer useful to society, ensuring that those resources are captured for re-use and recycling, and recovery or reintegration into ecosystems.

3.24 Whilst increasing recycling rates is important, it is essential that mechanisms and drivers are put in place to encourage prevention and re-use of waste as recognised by the Welsh Government waste prevention programme. Manufacturers have a role in assisting householders to prevent waste through designing out waste in products as well as ensuring their products and packaging can be re-used or widely recycled by householders at the end of their use. Local authorities and other public-sector organisations, including Natural Resources Wales, must ensure that they take steps to influence sustainable procurement so that it optimises low waste. Wales must create a circular economy that moves away from the current linear model, where materials are fed in to the economy at the start and discarded at the end.

3.25 The data used by the Welsh Government to measure performance against waste prevention is of variable quality. Natural Resources Wales is a partner in discussions about the development of a new single UK waste data collection system to meet the needs of all public-sector data reporting on waste. This would have potential advantages including the recording of more timely, accurate waste data to inform policy intervention and measure progress of each sector in Wales in reducing their waste arisings.

We welcome the opportunity to provide verbal evidence to the Public Accounts Committee on the 4th November 2019.

For more information

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