

## DEFRA Consultation on Waste Prevention Programme for England – Response from the Renewable Energy Association

The Renewable Energy Association (REA) is pleased to submit this response to **DEFRA's Consultation on Waste Prevention Programme for England**. The REA represents a wide variety of organisations, including generators, project developers, fuel and power suppliers, investors, equipment producers, biological treatment operators and service providers. Members range in size from major multinationals to sole traders. There are over 1100 corporate members of the REA, making it the largest renewable energy trade association in the UK. The REA's main objective is to secure the best legislative and regulatory framework for expanding renewable energy production in the UK. The Solar Trade Association is affiliated to the REA.

### Introduction

The Government have an obligation under the Waste Framework Directive (2008/98/EC) to publish their first Waste Prevention Programme for England no later than December 2013. In addition this was a commitment given by Government within the review of waste policy in England in 2011.

REA recognises the need for the waste hierarchy to be applied rigorously in respect to the governance and application of waste management within the UK in order that this delivers environmental economic and social benefits. To this end waste prevention has significant opportunity to further reduce the burden on both the tax payer and the Government.

As one of the requirements within the WFD is to ensure that relevant stakeholders and the general public have the opportunity to participate, REA welcomes the chance to express its views on this matter particularly in respect to issues surrounding the collection and treatment of biowastes.

### Comment

Waste avoidance is a factor which can significantly reduce the volumes of material that are disposed of and it should be noted that in respect to food waste volumes, although there continues to be material discarded, the financial climate currently prevalent within the UK has acted as a 'brake' on the volumes of food waste sent for further treatment. Although the REA does not have any hard evidence to support this fact, discussion with a number of operators has provided valuable feedback which indicates that this is being seen at treatment plants nationwide.

It is noted that within the document there is reference to home composting and its contribution to recycling. The REA recognise that this activity is not a preventative measure as the waste has arisen but has been treated 'in situ' reducing the burden on the local authority in respect to its subsequent transport and treatment.

It is good to see that there is recognition within the document that there should be priority given to materials which are likely to have the greatest impact on the environment. Food waste should be recognised as one such material given its GHG potential when not treated

through an appropriate facility, the current landfill tax has assisted in diverting material from landfill to biowaste treatment facilities such as anaerobic digestion and in-vessel composting, the REA welcomes this intervention.

Food waste which is the area of most concern to us, does have arisings which are inevitable from food manufacturing processes, it is important that where possible this material is processed through the most appropriate technology (AD) and that local authorities have the relevant infrastructure in place to segregate and treat food waste collections from domestic arisings (currently only 55% approx. of LAs collect food waste either separately or comingled with green waste).

## **REA response to the consultation - answers to questions**

### **Q1: Do you broadly agree with the proposed role for Government**

**REA's response:** Although the responsibility does lie with individuals ultimately and businesses to implement a reduction programme, we know from past experience that Government needs to lead on this and put in place the necessary reward and or punitive sanctions to make it happen. Good will and a green conscience alone are insufficient to drive the pace of change at the desired speed.

Local authorities play a very important role in this through educating the public and where possible implementing a rigorous collection policy which directs and guides individuals to 'do the right thing' the REA support the role that WRAP play in this work. The 'Love Food Hate Waste' campaign was one initiative which has been instrumental in reducing food waste at a domestic level.

### **Q2: Do you broadly agree with the proposed role for Business?**

**REA's response:** Cost control within the business community is at the heart of any good business plan and waste prevention and reduction in a wide range of industries is an important cost control mechanism which can contribute significantly to bottom line performance.

Given that we are still living in an era of 'austerity' and industry is only just starting to claw its way out of the most prolonged recession in living memory, then cost control will feature high in Board room discussions across the land. The continued escalation of the landfill tax will also act as a further disincentive to business to produce waste within their operational practices.

### **Q3: Do you broadly agree with the proposed role for Local Authorities?**

**REA's response:** As local authorities are spending public money, it is essential that their funds are spent effectively and provide good value for money to the UK tax payer. There is evidence around the country of some real success stories where prevention plans and the communications to achieve this have worked well, HOWEVER too often these exemplars are not followed elsewhere; this should be encouraged by Government.

Local authorities are seen by most householders as their first and foremost point of contact in respect to the provision of waste management services and for this reason they are extremely influential.

Public awareness campaigns and influencing the manner in which people behave in respect to prevention, reduction, re-use and disposal of resources is at the heart of their remit and REA believe that providing additional support for local authorities to deliver these services is

essential in the future if we are to continue to improve participation and buy-in from the public. Budget cuts have been slashed in recent years and much of this direct face to face engagement has been removed.

We should not forget however that the majority of our waste arisings come from the commercial and industrial sector and this interface needs to be given equal importance in the future. There continues to be a paucity of information in respect to the actual volumes of material which arise from this sector and this needs to be addressed as understanding better the waste composition will aid targeted campaigns to address the key material streams at source.

**Q4: Do you broadly agree with the proposed role for others and individuals?**

**REA's response:** We should not forget that the retailer plays a vital role in the manner in which they package, market and distribute their goods (particularly food). This has a profound impact on the subsequent consumer habits and downstream disposal/re-use recycling options.

Carrier bags are a good example of this, where in the past all that was on offer from supermarkets was single use PET bags, all now offer 'bag for life' alternatives with some offering compostable bags. These can be used for storing food waste in at the point of recycling for onward use at AD or in-vessel composting facilities rather than ending up in landfill as was previously the case. The recent decision by Government to implement a charging mechanism for carrier bags as adopted elsewhere will encourage *shoppers* to consider alternative options and reduce the 8.5 billion bags currently used annually by the retail sector.

Providing information to householders to inform them of the options is a valuable mechanism for implementing change as long as this is done sensitively and not in a condescending manner which is likely to incite opposition (big brother approach!)

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