



Scottish Council for
Development and Industry

POLICY SUBMISSION

ZERO WASTE PLAN

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SCDI is an independent and inclusive economic development network which seeks to influence and inspire government and key stakeholders with our ambitious vision to create shared sustainable economic prosperity for Scotland.

For more information on this response please contact the SCDI Policy Team at

Campsie House
17 Park Circus Place
Glasgow
G3 6AH

e policyteam@scdi.org.uk

t 0141 332 9119

Zero Waste Plan

1. SCDI is an independent membership network that strengthens Scotland's competitiveness by influencing Government policies to encourage sustainable economic prosperity. SCDI's membership includes businesses, trades unions, local authorities, educational institutions, the voluntary sector and faith groups.
2. Waste management is a significant concern to SCDI for a range of reasons. Despite the excellent progress which has been made in improving Scotland's until recently abysmal recycling rates, its waste management is still unsustainable. Following a sharp fall in the number of operational landfills, and increasing transportation and treatment costs, waste costs for businesses are predicted to rise by between 400 per cent and 800 per cent in the medium term. Trucking of more waste to sites further away will also increase congestion and CO₂ emissions. For economic and environmental reasons action is necessary.

Question 1.

What further steps, if any, need to be taken to promote the waste hierarchy?

3. The Recycling component of the waste hierarchy is now widely understood. However, the principles and benefits of Reduction, Re-Use and Recovery, especially energy recovery, are not. This is despite Reduction and Re-Use being higher in the waste hierarchy than Recycling. Successful examples of initiatives to Reduce waste in recent years include co-ordinated action by retailers to reduce the availability of disposable carrier bags at the point of sale and award points on store cards for the use of reusable bags, and WRAP's 'Love Food, Hate Waste' campaign which highlights the money households save by wasting less food and which has proved especially effective in areas served by food waste collections. Both suggest that financial incentives for Reduction and Re-Use are an important motivation, particularly when supported by measures which make behavioural change comparatively more convenient. Similar steps could be taken with other products and SCDI hopes that a food waste service can be offered to all households. Greater consistency would make the wider message clearer, which should mean that behavioural change is not limited to certain products, promoting a more general culture change to Reduction and Re-Use.
4. The Zero Waste Plan re-affirms the environmental benefits of the Recovery component of the waste hierarchy. Energy from waste reduces CO₂ emissions from landfill and the need to generate electricity from fossil fuels, and, therefore - providing the waste is pre-treated and the emissions are tightly controlled - has a part to play in achieving the Scottish Government's climate change targets. However, community support for the energy from waste infrastructure necessary to help limit landfill to the Zero Waste Plan's target of no more than 5% of the municipal waste total by 2025 is often undermined by negative campaigning. Further steps should be taken to promote impartial information on Recovery to communities, their representatives, planners and other decision makers.
5. Further steps by Government to support progressive policies on waste and promote the waste hierarchy are needed, but it should not be forgotten that many businesses are already working successfully in this competitive market place.

Question 2.

- a) Waste tonnage will continue to be the main measure of progress. However, should Government also use other ways of measuring progress? **Yes.**
 - b) If yes, what measures, how and why?
6. SCDI agrees that waste tonnage should continue to be the main measure of progress. The environmental and economic benefits should be included in the annual report and publicised to encourage culture change. This would include reductions in Greenhouse Gas Emissions, both in

terms of manufacture and disposal of waste, and it would also be broken down by local authority to assist planners and councillors with their decision-making on collection systems. Economic factors, such as capital investment, jobs created in the design, construction and operation of facilities including training opportunities, expenditure on suppliers and services, and spending in the local economy from employees' wages, should also be highlighted. If possible, estimates could be made on the average sums saved by households due to Re-Use and Reduction.

Question 3.

- a) Do you agree with these proposals on improving data? **Yes.**
b) If no, what should be done and how and by whom?

7. Information on waste is already required from and produced by industries such as chemical, whisky and farming, and a significant amount of paperwork and time are associated with regulatory compliance. It may be possible to fulfill the aim of improving data following a review of existing data held locally within SEPA.
8. Regulations to make it mandatory for businesses to complete SEPA's waste data request should be proportionate. The information requested should be clear, advice and support should be available, and data recording and completion of the form should not add significant new burdens to businesses, especially SMEs. The data gathered by SEPA should be distributed to Planning Authorities and presented in a user-friendly way to inform their policies and decision-making.

Question 4.

What should be the future role of Area Waste Groups and Area Waste Plans?

Options include:

- i) Abolition (if so, how do you feel local needs could best be supported and developed?).
ii) Updating Area Groups and Plans to reflect this Plan's objectives.
iii) Scottish Environment Protection Agency (SEPA) to prepare new Area Plans which focus exclusively on data and infrastructure, similar to the Strategic Waste Management Reviews.
iv) Using the Groups to monitor local delivery but with no Plan making requirements.
v) Other option. If so, please outline.

9. SCDI understands that existing Area Waste Plans are out-of-date and not aligned with Government targets, and that Area Waste Groups do not meet. There is clearly a need for better information and planning at a sub-national level, but, with waste management facilities serving regional rather than local markets, it would be sensible for new area plans to focus on regional co-ordination and provide clear guidance on infrastructure requirements and updated information. This data should be used to inform the public about the options in the waste hierarchy and how they can support the achievement of the Zero Waste targets.

Question 5.

- a) Is there a need for a simplified delivery body programme? **Yes.** If yes, what form should this take?
b) Are there areas where additional work is required from delivery bodies to support progress towards a Zero Waste Scotland? **Yes.** If yes, what are these areas of additional work?
c) Are there current areas of work which delivery bodies could stop doing? **Unsure.** If yes, what are these areas of work?

10. These programmes have had great success in terms of the cost savings achieved, but the Zero Waste Plan represents an opportunity for further integration of delivery of sustainable waste management across Scotland. The primary objective of simplification should be to provide more structured advice and integrated services rather than to reduce funding for the programmes. SCDI is aware that trade associations have been an effective way for government funded advisory services to engage with sectors and industries, particularly by highlighting cost savings which can be achieved by efficient waste management.

11. SCDI would support additional work to create markets for materials in Scotland and increase reprocessing capacity. A particular opportunity has been highlighted to SCDI to recycle Scotland's waste paper the former International Paper mill in Inverurie, Aberdeenshire rather than export it to England or abroad.
12. Another opportunity would be to incentivise re-use of materials by manufacturers.
13. Additional work by the Scottish Government is especially needed to inform the public of the economic and environmental needs for and benefits of new energy from waste facilities in order to improve community engagement in planning.

Question 6.

To date, development plans have not always identified sites and/or locational criteria for waste management plants. What can be done to ensure that development plans do so in future?

14. Early engagement with the private sector on their plans, local authority waste managers and communities would improve development planning. This should ensure that sufficient and suitable sites and/ or locational criteria are identified.
15. Up-to-date data and clear guidance on national and regional infrastructure requirements, particularly in relation to energy from waste and landfill, would better inform development planning. Anaerobic digestion and mixed plastic recycling facilities must be built in the most appropriate places to maximise potential returns for operators. The proximity principle is a particularly important factor for anaerobic digestion. The Scottish Government should support the identification of the best locations for waste management plants and clarify how the proximity principle on the disposal of waste as close to its source as possible should be interpreted by Planning Authorities with regard to specific products.
16. The capacity of facilities should be planned on the basis of projections of future demand for waste management plants, rather than to manage today's volumes.
17. Scotland's target for renewable heat in 2020 will require substantial progress from a very low base and therefore the rapid deployment of technologies. The Scottish Government should support this by helping Planning Authorities to identify existing high heat users which may then be suitable locations for energy from waste developments. For example, Diageo's plans to expand the Cameronbridge Distillery in Fife is intended to achieve zero landfill and includes a bioenergy plant which could provide heat to a local hospital. Opportunities for co-locations and connections should be incorporated into development plans.
18. To minimise the need for long distance road transport, the potential of rail and waterborne transport should be considered for long distance movements. There should be appraisals of the carbon impacts of the options for waste transport.

Question 7.

- a) Should Government set a target of reducing municipal waste by 1% per annum? **Needs clarification.**
- b) Should Government set any specific targets on reducing household waste? **See above.** If yes, what targets?

19. SCDI would support the principle of supporting retailers in building on their targets of zero growth in packaging placed on the market in 2008 and an absolute reduction in the weight of packaging placed on the market in 2010. But it has concerns about how such a target would be applied at a local level. Areas which successfully encourage population/ business growth would find the targets more challenging than areas in which the population is falling. In contrast with Recycling, local authorities also have, at present, little influence over waste Reduction. This would change if

local authorities were allowed to use direct variable charging for householders based on the amount of waste they put out for collection. The consultation states that the Scottish Government has no current intention of introducing these charges, but provides no reason(s) for this policy.

Question 8.

- a) Should Government set a target in relation to "preparing for re-use"? **Unsure.**
- b) If yes, what sort of target should be introduced and how will it be achieved and measured?

20. Promoting the preparation of waste for Re-Use through segregation would support markets for Recycling and the development of energy Recovery facilities. However, SCDI is not convinced of the benefits of targets which measure preparation for Re-Use as opposed to actual Re-Use. Many forms of Re-use, such as Classified Adverts and car boot sales, could not be monitored and any targets would therefore need to be specific, probably to specific industrial wastes.

Question 9.

What targets, if any, should Government set in relation to the prevention of commercial and industrial waste and construction and demolition waste?

- 21. Figures suggest that UK industry produces around 100 million tonnes of waste each year, costing about 4.5% of turnover, equivalent to £15 billion annually. SCDI is supportive of the view that there needs to be greater scope to promote waste prevention in the construction, lifetime and demolition phases of development. This could be a positive opportunity provided adequate resources and information are provided to allow local authorities and developers to engage and foster more integrated approaches to sustainable waste management.
- 22. Any targets would need to be industry specific due to the wide range of wastes and would need to be agreed following consultations with each of the industries. Any targets should not add significant new financial burdens to businesses, especially with all businesses facing higher cost pressures at present, and it may be a more proportionate approach to establish principles than to enforce targets, or to agree voluntary targets in certain proactive and progressive industries which may be the best way of improving performance and meeting specific challenges.
- 23. A vast majority of Scottish businesses are SMEs so there should be a concerted effort to maximise the dissemination of information and proliferation of services in this area, particularly as the changing procurement practices of large public and private organisations can have significant cost implications for smaller companies attempting to comply with green certification requirements in their supply bids.

Question 10.

- a) Have any potential waste prevention actions been missed?
- b) Are there any actions listed which are not worth pursuing, and why? **No.**

24. The Scottish Government should widely promote best practice principles.

Question 11.

On improving municipal recycling rates:

- a) Do you agree with the key actions needed to improve municipal recycling rates? **Yes.** If no, what else should be done?
- b) Should most (e.g. 80%) of the recycling targets be met through collections of recyclate at kerbside and through recycling centres and points? **Yes/No.**
- c) Do you consider that local authorities need more in-depth support to help improve municipal recycling performance? **Yes.** If yes, what should be done?

d) Do you consider that there could be a greater role for incentives to improve recycling performance? **Yes.** If yes, what type of incentives?

e) Should any changes be made to the categories of household waste where local authorities can charge for collection? **No.** If yes, what changes should be made?

25. Improving communication is particularly important and this goes beyond the local campaigns mentioned. Retailers have developed an On-Pack Recycling Label to improve consumer understanding of the recycling of materials in the UK, and the Scottish Government should encourage promotion and use of this in Scotland.
26. New development should be designed to enable the collection of waste. If new developments of flats have specific space for recycling containers inside and, for collection, outside this would encourage more recycling and enable greater segregation of materials. If developments have space for individual rather than communal bins this increases household accountability for waste and supports the introduction of steps, such as fortnightly collections, which limit disposal.
27. SCDI understands that most local authorities would be unlikely to be able to afford the investment in kerbside collections required to achieve a target of 80%. How they meet the target should perhaps be left to local authorities' discretion, but greater consistency on what is collected would help consumer understanding. Food retailers have made significant strides in waste reduction. However, one challenge which they face is in the variation of materials accepted by local authorities for recycling. If there was more consistency in recycling, this would send signals to retailers about what type of packages to use for their products.
28. Kerbside collection is the most effective collection method, supplemented by additional infrastructure provided by retailers for materials not collected kerbside. More services for kerbside collection of segregated organic waste are needed.
29. The Scottish Government should support the wide dissemination of best practice between the private and public sectors, and provide clear information for Planning Authorities on the relative performance of systems and technologies.
30. The Scottish Government should consider incentives, including rewards or discounts, for good behaviour and direct variable charging for households. On charging, it should explain, with reference to the targets in the Zero Waste Plan, why it has no current intention of allowing local authorities to use them. Collections every fortnight rather than week would also encourage prevention.

Question 12.

What more should be done to encourage recycling in public places?

31. Provision of recycling bins in streets, shopping centres, workplaces, transport hubs, and entertainment and cultural centres could be increased by the Scottish and local government in partnership with retailers, employers, operators and owners, for instance in Business Improvements Districts in cities and towns. These should be communal rather than in individual premises to aid collection.
32. More consistency in the colouring of bins for specific materials would improve the familiarity of people with recycling in public places and maximise its quality.

Question 13.

Should a campaign be run reminding companies of their responsibility under Duty of Care? **Yes.**

33. Many of the components of Scotland's Zero Waste Plan are part of sound business practice. A well-managed company uses resources – both people and material – efficiently and certain

industries, such as tourism, increasingly depend on Scotland as a whole being perceived globally as a “clean, green” country. SCDI would commend the Scotch whisky industry’s environmental strategy. Any campaign should be accompanied by improvements in access to waste facilities.

34. SCDI has previously organised series of business seminars in conjunction with the Envirowise, detailing waste minimisation advice services to business. It would be pleased to discuss partnership opportunities to publicise the Zero Waste Plan.

Question 14.

- a) Do you agree that these are the priority materials and sectors for which tailored programmes of work should be developed? **Yes.**
b) If no, what should be included?

35. SCDI agrees with the priority materials and sectors listed, but it has some additions. It understands that the recycling of Waste Electronic and Electrical Equipment and Batteries are subject to European Directives and that there may be opportunities to achieve significant increases in collection rates for these materials at low cost. Farm and manufacturing materials should also be added.

36. Opportunities for businesses to share collection and storage facilities could be incentivised and incorporated into the future planning and building of facilities.

Question 15.

- a) Should Government set a target on reducing the amount of commercial and industrial waste sent to landfill by 150,000 tonnes a year? **No.**
b) Should Government set targets by specific sectors, companies or materials? **Unsure.** If yes, which sectors, companies or materials, and why?

37. The commercial and industrial sectors are the largest producers of waste in Scotland and should be a focus for further steps in the Zero Waste Plan. However, SCDI is hesitant about supporting a target at this stage because much of the relevant data is out-of-date and as a result there would be a risk that any targets are not proportionate and add significant financial burdens to businesses. Waste audits would better demonstrate compliance with the waste hierarchy.

38. The barriers for SMEs are cost, time, awareness, resource and facilities. There is a lack of local recycling facilities for small businesses, particularly, but not exclusively, in rural areas. There needs to be support and investment to provide better access to the full range of waste management facilities. This should include an adequate network of accessible and affordable recycling facilities.

Question 16.

- a) Should Government explore further the merits of different forms of producer responsibility, which might more directly support household recycling collections? **Yes.**
b) Should Government explore further whether extended producer responsibility as outlined in Article 8 of the revised Waste Framework Directive should be introduced? **Yes.** If yes, what materials?
c) Should Government or other bodies do more to extend the concept of voluntary producer responsibility? **Yes.** If yes, what?

39. The Scottish Government should explore further the merits of different forms of producer responsibility in order to support recycling, but before they are introduced it would have to be sure that the form is workable given the number of different producers and suppliers involved, fair to them all and does not impose significant new financial burdens on businesses in the economic recovery.

40. Although fiscal and regulatory pressures will be the most likely drivers in reducing waste arisings, landfill reduction and recycling, SCDI believes that voluntary agreements can and do increase recycling and general resource efficiency. This is particularly true where the cost-benefits are outlined to businesses and can be most effectively extended through representative and advisory organisations. Extension of voluntary producer responsibility would disseminate best practice and, backed by incentives or certification, be a source of competitive advantage.

Question 17.

Do you agree that the cap should not extend to mixed waste treatment, such as Mechanical Biological Treatment (MBT), Mechanical Heat Treatment (MHT) and Anaerobic Digestion taking mixed waste? **Yes.** If no, why not?

41. By reducing the volume of the waste and the efficiency of the energy recovery process, Mechanical Biological Treatment and Mechanical Heat Treatment will both help to meet renewable energy and climate change targets, and the cap should therefore not be extended to them. Furthermore, if the cap is extended to these mixed waste treatments, local authorities would face unaffordable costs.
42. Anaerobic Digestion is, unlike the other mixed waste treatments, not an energy intensive process. It should not be included in this question and there should be no question of extending the cap to it. There is the potential to convert organic waste into 2/3 TW of biogas in Scotland. It is possible to envisage a network of thousands of small Anaerobic Digestion plants to process organic waste, farm waste and purpose-grown crops, with embedded methane production sites for injection into the gas grid. However, problems which have been identified as stalling the creation of this market include a reluctance to enter into the length of contracts which would enable investment in the infrastructure and CSR policies in industry which are seen as preventing the productive re-use of organic waste.
43. A number of Scotch whisky distillers are investing in or exploring opportunities to convert distilling co-products as alternative fuels rather than animal feeds. This would supply cleaner heat and electricity for the distillery, reduce heat and electricity use by the animal feed plants and remove the carbon emissions from the transport of the by-products. The whisky industry has been concerned the re-use and recycling of biomass waste is prioritised over its use as a renewable fuel. In the case of converting distillery co-products this may be interpreted as favouring the re-use or recycling of biomass in animal feeds over their potential use as a renewable energy form. This would be a barrier to improving the industry's sustainability. The industry has also flagged-up concerns that, due to the increasingly narrow interpretation adopted by the UK, SEPA may have to consider distillers' by-product for heat energy as "wastes", which would then make them subject to waste legislation, increasing costs to the industry. Commercial imperatives would as a result force companies to abandon their investment plans for converting distilling co-products into alternative fuels, use less sustainable fuel sources onsite and use more energy offsite in continuing to convert the co-products into animal feeds. SCDI would support the call for the adoption of a definition of by-products which would support rather than threaten the sustainable energy projects which are being developed by the industry.
44. Injecting biomethane into the gas network can reduce its carbon intensity. SCDI believes that it should be made at least as attractive to introduce it into the gas distribution system as to burn it on-site. At present, biogas is used to generate electricity, but it suffers 30% transmission losses on the grid and, as there are often no heat users in proximity, the heat is wasted. While some of this organic waste could be used onsite or locally - as set out above in the case of distilleries - there is also the potential to produce a significant amount of bioenergy for transport in the national grid. One proposal is that if biomethane is injected into the gas network in one location, a Combined Heat and Power plant in another location should be able to take out an equivalent volume of natural gas for use where it is needed and still receive the Renewables Obligation Certificates given as if the CHP was immediately beside the biogas plant. This would mean that the biogas plants could remain in rural locations close to where the waste is sourced (avoiding

carbon emissions through vehicle transport) and away from population centres where they may be planning difficulties, the digestate can easily be spread on the land as high quality fertiliser and there would be more renewable heat on the grid. Such a system already works at the 10mW biogas plant in Schwandorf in Germany. SCDI considers that this proposal is worthy of further investigation and consideration by both the Scottish and UK Governments.

Question 18.

Should the cap extend to single-stream municipal wastes going to energy from waste plants? **No.**

45. Local authorities should generally be able to make decisions based on the Best Practical Environmental Option and Best Value. Clarification is required on a number of points. This includes how the target of no more than 25% of municipal waste being recovered should be precisely defined and monitored by developers and Planning Officers, whether regional means Area Waste Plans or Strategic Development Plan Areas, and how a regional approach fits with the proximity principle. It is unclear how the planning system could police such a cap with facilities which are already open and whether it is proposed that planning conditions could be altered for already consented plants if a subsequent application is received which, together, would fail to comply with this target.

Question 19.

a) Should Government support local authorities when they seek to procure or build infrastructure to treat residual waste? **Yes.**

b) If yes, what should Government do?

46. There is a need for provision of more accessible and affordable alternatives to commercial waste disposal in the form of recycling and waste treatment centres. SCDI was surprised that there was not more attention paid in the Scottish Government's Infrastructure Investment Plan to commercial waste management. It welcomes the greater consideration in the National Planning Framework 2.
47. Government should consider all proposals to treat residual waste and, if they have a better environmental impact than landfill, it should support them. Clear guidance on infrastructure requirements and information on the relative performance of systems and technologies for planners and other decision-makers would be helpful, along with factual information for communities and their representatives. The Scottish Government should also provide technical and procurement support. In relation to the financing of infrastructure, the biomass element of the waste stream should be eligible for renewable energy grants.

Question 20.

Do you have any initial views on materials or streams or products which could be banned from landfill?

48. Enforcement and identification of small amounts of materials, and the question of linked materials and their potential for recycling or reuse, would present significant practical problems in introducing bans on landfill disposal of certain materials. There would also have to be sustainable markets made available, which would be easily accessible for the recycling and re-use of such materials.
49. Food waste currently accounts for 20 per cent of household waste, over half of which could be eaten, which makes up a significant proportion of waste disposal. There is a case for banning organic materials from landfill because they produce methane gas which is a particularly dangerous greenhouse gas. If energy is recovered from this waste, the gases emitted are less harmful and it also reduces the need for energy from fossil fuels, in both ways mitigating climate change.

Question 21.

- a) What opportunities would arise in this area if Scotland had fiscal autonomy, with the power to set the rate of landfill tax in Scotland?
- b) What might the effects of a different constitutional arrangement for Scotland be in this area?

50. Any opportunities arising would depend on the rate of landfill tax and whether the revenues raised are subsequently reinvested in developing waste infrastructure.

51. The UK Government has already announced annual increases in landfill tax until 2013. The rate of landfill tax could not rise above the rest of the UK without compromising the competitiveness of Scotland as a business location and the Scottish Government's targets of matching and surpassing the UK's growth rate.

Question 22.

Are there any other points you wish to make?

52. The Zero Waste Plan should be followed by an action plan which sets out further steps towards the targets in each area and progress monitoring. Key areas of waste infrastructure need to be prioritised and ways will need to be found to fund them in a prolonged period of budgetary constraints and low business growth.

53. In SCDI's opinion, the Scottish Government should draw up a national waste management overview which clearly highlights the gaps and opportunities.

Gareth Williams
Head of Policy
Scottish Council for Development and Industry