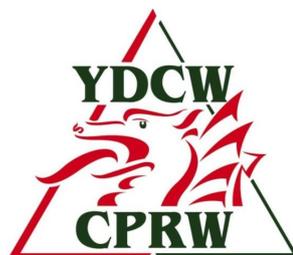


The Circular Economy in Wales – Welsh Government Consultation

20th April 2020

Submission from CPRW National Executive Committee (The Campaign for the Protection of Rural Wales)



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CPRW was founded in 1928, this year celebrates its 92nd anniversary, and is Wales' only organisation whose primary concern is the country's rural landscape together with the land uses and economy that support it. It is a membership charity (number: 239899) with its head office at 31 High Street Welshpool Powys and 14 Branches. Further details are to be found on its website (<https://cprw.org.uk>) including its National Executive Committee (NEC) and representative advisory Council.

1. **“Building on our recycling record”**

Question 1: Are the suggested actions the best way to help us recycle more?

We very much welcome the emphasis on recycling rubbish rather than it going to landfill or incineration.

We also warmly welcome the aim to bring neglected but very significant items such as nappies and mattresses into the system. Likewise electrical and electronic equipment which we believe could also have the advantage of additional recovery of scarce metal resources. We recommend that links to repair facilities could be explored to provide employment and low cost renovated goods along the lines of the successful local community repair initiatives.

People who make efforts to improve their own small-scale contributions are discouraged by what they see on a much larger scale in the commercial world. It is high time that non-domestic premises, including businesses, are required to collect waste and separate re-cyclable goods. This should include hospitality, catering, agriculture and horticulture enterprises.

We also see a danger of the waste tail wagging the recycling dog. If recycling becomes an end in itself, the risk is creation of an elaborate infrastructure devoted to recycling which requires feeding with adequate and sustained quantities of specific categories of waste materials for economic viability and political justification.

There is also a risk that at the individual or social level, people will believe that conscientious sorting of rubbish somehow resolves a “waste problem”. The problem really comes from the production and consumption of so many items which end up as waste in the first place. The huge task before us is to decide which of these can either be forgone or manufactured out of bio-degradable or re-usable materials and how our production and consumption patterns can be adjusted accordingly. There should be more focus on reduction of domestic and industrial waste, including agricultural and horticultural waste. These are revisited in Qs 4-6.

The “rate of recycling” and what this represents is not clearly set out. We assume the rate is a fraction of the total weight of waste produced per unit of time. If total waste were successfully reduced earlier in the chain, a greater fraction might still represent a smaller quantity in weight. Since some materials are more successfully recycled than others, weight alone, of variously mixed wastes, is likely to give a poor indication of the environmental challenges of disposal.

There is no discussion of the various methods of recycling waste materials, with their use of energy and other resources, any unwanted by-products and pollution, and the nature of the resulting new products. For example, plastic bottles can be made into polyester fleeces, but wearing and washing these is a significant contribution to the plastic microfibres in our environment and what happens to the fleeces when they are no longer wearable? The fact that most single use plastic can only be recycled once and most paper can only be recycled to lower-grade goods is not discussed.¹ Recycling many items may be usefully extending a linear economy but it is not creating a circular economy.

Question 2: Should recycling arrangements across Wales be consistent?

Yes, unless there is a good reason for difference. Ideally, an overall system should be applied throughout Wales with recognition that people in different environments do have different restrictions and needs and that some facilities are sparsely dispersed. Colour-coding and rules for separation of items should be standardised as far as possible so that there is the absolute minimum of public confusion and maximum integration of facilities across local authority boundaries. Standardisation will have the caveat that there must be room to support the trial and dissemination of successful local innovations and develop systems

¹ <https://earth911.com/business-policy/how-many-times-recycled/>

which can adapt to changing circumstances. Many urban dwellers lack domestic space for bulky bins and boxes whilst collection vehicles do not reach all rural dwellings. Communal facilities should be used to facilitate disposal of waste which can be recycled and these should be in places which people already visit or pass by for other services like fuel or groceries. Currently, many local recycling centres have been closed so that people need to drive excessive distances. This encourages fly-tipping and bonfires.

Question 3: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

The emphasis needs to be on acquiring less to throw away and then recycling as much as possible. One reader commented this section was like “motherhood and apple pie” and needs much further development. CPRW believes the mantra should be **REDUCE - REUSE - RECYCLE** (in that order)

2.Supporting Prevention and re-use.

Question 4: What actions could we take to further promote the work on prevention and re-use that occur in our communities?

We believe that many people will respond to statistics on the results of their actions: authorities should publish information on the amount of local waste together with transparent analysis of what happens to it and suggestions of how people could reduce their own contribution. They could use the press, information circulated with rubbish collections and opportunities in local newsletters. They could also make Local Councils and the public aware of differing performance and solutions throughout Wales.

Question 5: Do you agree we should develop and expand the work we do in schools on waste prevention and re-use?

Yes. Education is key. Basic education on the provenance of raw and manufactured materials and their use in human society should be a compulsory part of the curriculum for all. Future generations should be aware of transport costs and the impact of consumption on the environment and living conditions at home and in foreign countries. This is the wider context for education in waste prevention and re-use which we strongly agree should be expanded.

Question 6: What do you think are the key steps that we need to take to further reduce avoidable food waste?

Community action groups are important but ultimately pressure must be applied to manufacture and retail. Education has a part to play in encouraging awareness and the roles of domestic planning and home cooking, including cooking with left-overs.

While it helps to avoid of multiple mini-packages and temptations of multi-buys of perishable products these are entrenched marketing techniques which need addressing earlier in the production-consumption chain. Sell-by dates are a cause of a great deal of waste where a better compromise between health risks and unnecessary throwing out could perhaps be achieved by substituting advisory dates.

Question 7: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

These are laudable actions but they are aspirational and do not include enough real-world information about how improvement will be achieved or monitored. We are not sure to what extent “access to advice” and “encouragement” will be matched by determined regulation and a strong Wales voice on UK and international platforms. We cannot wait for the benefits of education. The waste issue we confront must be tackled now with all the powers at the Welsh Government’s disposal.

A transparent levy on plastic/plasticized cups could be used to change habits.

In an economic environment where profits are made by continual expansion of ranges and choices, packaging has a key role. Most of our products are manufactured for a UK-wide, if not multi-national, market so that success in controlling packaging will require leverage at a wider level than Wales.

Pressure to create more durable items, particularly all electrical/electronic appliances and global standards and design for cable connection points would make huge global savings in waste but unilateral action can only be taken by imposing national standards.

There need to be major changes at national government level so that increasingly large farms and food processing plants are not the only ones who can survive. Smaller units supplying local need require less packaging and less transport.

The Welsh Government also needs to think strategically about how waste-saving measures can be incorporated into increasingly popular on-line shopping with home delivery services. This is part of a much bigger issue of the failure of national economies to collect tax from and exercise control over large global on-line enterprises. The Welsh Government should use national and international platforms to ensure that the principle of “polluter pays” is properly related to the nature and scale of waste produced.

3. Driving innovation and materials use

Question 8: Are the materials we have listed ones we should focus attention on?

The focus is on plastic is understandable but the final undertaking “*We will also act to support innovation in developing innovative and better alternative materials whilst working to use lower carbon alternatives for the materials we use*” is too vague. It lacks any mention of other materials or exploration of what “low carbon” means (for instance wood is a high-carbon material even though it is possible to replant trees). Other materials which come immediately to mind are scarce minerals including rare-earth metals, horticultural peat-based compost, concrete and vehicle tyres.

The notion that some plastic can be infinitely recycled is false. We welcome the intention to explore bioplastics but bioplastics are not all more degradable than some non-bio-plastics and bioplastics do not degrade rapidly in watercourses. This is a complex subject and we trust the complexity will be respected in Government advice and regulation.

Discussions frequently centre on food packaging and ignore packaging of cleaning products, pharmaceuticals (including for agriculture and horticulture), cosmetics, livestock feed and domestic pet feeds. It is essential to find ways of reducing production and use of plastic containers and of reducing production and use of difficult to recycle items which include plastic coating, such as plastic-coated paper coffee cups.

If there is no alternative to plastic, refills are an option but, of course, there are difficulties for an economy based on wide choice. Sufficient public support could induce some manufacturers to provide refills to maintain brand loyalty.

Question 9: Are design changes in products using the materials listed an area to focus on?

Design changes should be encouraged right through production systems. Design changes can result in less waste by-products, less single-use materials in final products and reduce quantities of packaging. Cleaning products in containers each with a new dispenser or spray nozzle are wasteful. Convenience packaging is frequently wasteful. The better alternative of larger containers with greater volume to surface area ratio, requires division at home and this requires organisation and time and sometimes reduction of choice for individuals. Therefore it requires personal and public commitment.

The Welsh Government has to face the fact that infinite diversification and marketing of food and drink products encouraged in business models for “a Prosperous Wales” is frequently incompatible with the aims of a Zero-Waste policy.

Question 10: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy? (~~Are there other materials we could focus on and why?~~ Repeats Question 8)

The near-immediate success of the ban of plastic carrier bags in Welsh shops was very encouraging, and, contrary to expectations, very smooth. It proved people can accept change if a tangible solution is available. We are pleased to see the commitment in this consultation.

The consultation has neatly side-stepped the problem of green waste which is of major concern to the public. In Powys, at least, local recycling of green waste has been abolished and the public must now pay extra for green-waste disposal.

4. Using Government Levers

Question 11: Is our focus on improving resource efficient procurement within the Public Service a priority area?

Yes, because public services are large consumers and because people must see that the Government observes its own advice and regulations. This will presumably apply to infrastructure construction and maintenance, buildings, furnishings, cleaning products, canteens and kitchens throughout the public sector, including the health sector.

Question 12: Is our focus on materials used and resource efficiency in construction a primary consideration to implement for the future?

Yes, taking durability into account. Although we have not seen renewable energy policies mentioned, the Welsh Government must not duck these issues in drafting and implementing RE policies. Resources used (concrete, metal, battery components, electric cable etc.) and end of life disposal must be factored in and firmly controlled from the outset.

Question 13: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

2nd bullet: "We will work to make sure that the public sector in Wales does not purchase products that adversely affect the human rights or the environment in other countries. We will also encourage Welsh businesses to adopt the same principle".

This is a laudable aspiration but incompatible with many other Government Policies. An example is the encouragement of intensive livestock farming which depends on imported feedstuff produced by destroying biodiverse habitats. Will the public sector forget about the tropical forest and its communities or will it give up its chicken and ham sandwiches?

8th bullet: "We will introduce bans and restrict the sale of commonly littered single use plastic items"

How will levers be used to restrict sale of commonly littered items? These are fast-food packaging, drink cans and plastic bottles, cigarette packets and cigarette ends and sweet and savoury snack packages all of which are readily available at many thousands of outlets. How will this be extended to agricultural litter and careless rural businesses?

We agree with the aspirations in this section and applaud the underlying principle of producer responsibility but we require much more detail to be convinced they can and will be achieved. What will the "government levers" be for eliminating plastic (and all other litter) from our natural environment? How will this be extended from roadsides and public places to the rest of our Welsh countryside which is littered with discarded building residues, silage-baling plastic, damaged feed bags and buckets semi-incorporated into the ground and watercourses?

5. Enabling Communities and Businesses

Question 14: Is our continued business support to make them more resource efficient a priority action?

Yes but diversification of ready-to-consume products is part of the problem. Support is only likely to work if it is shown to be economically attractive or penalties are imposed.

Question 15: How would you view starting a Zero Waste Town area?

How can Zero Waste Towns incorporate the surrounding villages, rural enterprise and farming communities? Experience in and around Presteigne (Cwm Harry) suggests that the initiative achieved a lot in the town but did not succeed in getting farming and rural enterprise on board, and could only survive with significant Government support. How is Crickhowell's Zero Waste initiative managing?

Question 16: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

See answer to Q7

Question 17: Are the initiative actions mentioned here those we should aim to provide supporting infrastructure for?

All clean and smart technology for waste and recycling collection is good news. Much will depend on a clear regulatory framework for businesses and within the public sector.

Question 18: How can we work regionally to ensure resource efficient decision making?

We do not know the outcome of the NDF consultation on new Welsh Regions and we have not been told enough about Welsh Government plans for how national, regional and local authority policy and strategy will be organised to comment on this.

Question 19: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

CPRW considers that we need much clearer information on recycling and the kinds of arrangements that are made for waste disposal by incineration vs landfill and distribution of incinerators in Wales. People do not know what happens to items in their recycling bins and there is a degree of scepticism about whether they really are recycled and how vulnerable this is to contracts and markets outside government control. We understand that many Local Authority services are outsourced, including waste contracts which are often for a long time-period and may entail excessive transport. For instance, Powys food waste is handled by Agrivert near Oxford.

Consultation Approach and how to Respond

Question 20: We would like to know your views on the effects that our proposals in this document would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 21: Please also explain how you believe the proposed strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Did someone fail to read through these 2 horribly drafted questions? We cannot see how a rational program to reduce and recycle waste and protect our environment should have any relevance to the future of the Welsh Language so long as normal standards for producing Welsh written materials are maintained.

Question 22: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to address them.

We have raised the question of agricultural waste about which the Welsh Government published a Draft Position Statement in June 2014.²

Waste is defined in the EU Waste Framework Directive (Article 3 (1)) as meaning “any substance or object which the holder discards or intends or is required to discard”. Excluded from control under the Directive includes “faecal matter, straw and other natural non-hazardous agricultural or forestry material used in farming, forestry or for the production of energy such as biomass through processes or methods which do not harm the environment or endanger human health”, “animal by-products including processed products covered by Regulation (EC) No 1774/2002, except those which are destined for incineration, landfilling or use in a biogas or composting plant”, “carcasses of animals that have died other than by being slaughtered, including animals killed to eradicate epizootic diseases, and that are disposed of in accordance with Regulation (EC) No 1774/2002.

We believe there is a problem with the definitions of waste. It would have been useful if the Welsh Government Consultation Document had set out its categories of waste and given some indication of what is currently happening to waste, why this should be changed and what obstacles should be overcome.

Once something has been defined as waste, then the full weight of waste management law comes into play, along with environmental permits, or exemptions, waste management plans etc. But one person’s waste stream may be another person’s by-product. Perhaps the Welsh Government should work with NRW on the definition of waste to make it easier for businesses and local communities to class some wastes as by-products that can be used in other processes.

We also believe the rapidly developing area of biofuels and bio-digestion is relevant. This is a relatively new, expanding and diversifying field where there is potential for overlap between crops, livestock manure and slurry and certain types of “waste” and need for regulation of use of the digestate produced. There is a potential problem of (unsustainable) land use for plant fuel-crops in order to keep digesters in continual production so that “waste” materials can be processed.

The consultation does not mention green garden waste which is a major problem for all people without space for home-composting.

WRAP Cymru has recently reported that that a staggering 75 per cent of commercial and industrial (C&I) waste sent to incineration or landfill in Wales is recyclable.³ Incineration and landfill are a large part on any integrated waste plan, even if the overall aim is to phase them out. The consultation does not mention Welsh Government targets or strategies regarding incinerators and land- fill.

It has been awkward allocating our comments to the Questions because the Questions are divided among the 6 “Themes”, which are general approaches for achieving zero waste. However these 6 themes cross-cut the 8 “Headline Actions” and so, theoretically, each “Headline Action” should be addressed under each “Theme” but this would have made too laborious a document. While this problem may not hinder the flow of ideas and comments in consultation responses, we believe it could hinder analysis of responses and monitoring of Welsh Government progress. In future planning and monitoring we trust you will be looking at the **Actions** (harder, more quantitative data and preferable) rather than the **Themes** (softer, more interpretation/illustration and less rigorous).

² <https://gov.wales/sites/default/files/consultations/2018-01/140612-agricultural-waste-draft-position-statement-en.pdf>

³ <https://resource.co/article/75-cent-welsh-residual-business-waste-recyclable-says-wrap>