

Waste prevention



Friends of
the Earth
Scotland

10 June 2008

1. Introduction

Friends of the Earth Scotland welcomes the opportunity to comment, ahead of the private members debate on the subject of 'Tackling Excess Packaging' on Wednesday 11 June. In this briefing, we focus on the need to prioritise waste prevention and to adhere to the waste hierarchy.

2. 'Zero Waste' Scotland

In January 2008, Environment Secretary Richard Lochhead announced the Government's intention to move towards 'zero waste'¹. He proposed to consult on ambitious new targets including:

- The amount of Municipal Solid Waste (MSW) being recycled or composted is to be increased to 60% by 2020 and a new target of 70% by 2025;
- Landfill from MSW is to be reduced to 5% by 2025;
- No more than 25% of MSW is to be used to generate energy by 2025 and large, inefficient incinerators are to be rejected;
- The existing target of stopping the growth in MSW by 2010 will be retained.

Subsequently the Government has established an advisory group to help define 'zero waste' for Scotland. This is welcome, since in our view the new strategic waste targets, which permit some use of landfill and incineration, are not the same as 'zero waste', which should be based on waste prevention and the design of products to enable maximum recovery and reuse of materials.

3. The Waste Hierarchy

The concept of 'zero waste' means a strict adherence to the waste hierarchy, described in Scotland's National Waste Plan 2003². This sets options for managing waste in the following order of priority:

- Waste should be prevented or reduced at source as far as possible;
- Where waste cannot be prevented, waste materials or products should be reused directly, or refurbished then reused;
- Waste materials should then be recycled or reprocessed into a form that allows them to be reclaimed as a secondary raw material;
- Where useful secondary materials cannot be reclaimed, the energy content of waste should be recovered and used as a substitute for non-renewable energy resources;
- Only if waste cannot be prevented, reclaimed or recovered, should it be disposed of into the environment by landfilling, and this should only be undertaken in a controlled manner.

4. Waste prevention: top priority

Waste prevention is at the very top of the waste hierarchy: it is preferable to prevent waste rather than recycle or compost it. Waste that is not created in the first place does not need to be reused,

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recycled or disposed of. Preventing or reducing waste generation is the most energy- and cost-efficient way to deal with our waste.

Although recycling/composting rates are increasing in Scotland, the actual amount of waste produced is still rising – by around 1% each year³ - so preventing waste in the first place is critical. The Government aims to stop the growth in MSW by 2010. To help meet this target the previous Scottish Executive and SEPA released a 20-point ‘Household Waste Prevention Action Plan’ in February 2007⁴ including many of the activities advocated in this motion. Friends of the Earth Scotland supports such measures to reduce packaging waste. However, past experience of measures to encourage sustainable design and sustainable products, improve packaging guidelines for retailers and their suppliers, and introducing Producer Responsibility initiatives suggests that **robust support and enforcement by SEPA and the Scottish Government are essential to ensure they lead to mainstream change.**

5. Problems associated with mixed waste

As noted above, energy recovery is only appropriate once all useful secondary materials have been reclaimed. Effective implementation of the waste hierarchy would prevent the mixing of wastes and maximise the scope for materials reclamation. However technologies such as the Eco Deco are based on mechanical treatment of mixed waste, and subsequent separation of some recyclables, before processing into a refuse-derived fuel. The residues are composted.

Separating recyclable material after mechanical treatment of mixed waste is inefficient, and results in large amounts of recyclable material being converted into waste derived fuel, while recovered glass is intended to be used as aggregate rather than recycled and the composted residue is typically so contaminated and of such poor quality it is often only used as landfill cover – failing thereby to recover valuable nutrients. Moreover, in practice, markets for several of the ‘recovered’ materials are not fully developed. Overall it seems highly **unlikely that such technologies are practically capable of delivering the Scottish Government’s proposed recycling targets.** Friends of the Earth Scotland therefore cannot endorse such a technology as part of a movement towards zero waste.

6. Energy from Waste

The Eco Deco technology is one of a number of means of recovering energy from municipal waste. In some other parts of Scotland the waste industry has already brought forward proposals for large conventional incinerators without any guarantees that they will be compatible with recycling targets or will be subject to heat recovery. This jeopardises the Government’s strategic waste objectives. Friends of the Earth Scotland believes such proposals should be rejected.

7. Conclusion

While we welcome Government moves towards a zero-waste Scotland, such moves can only be delivered by adhering to the waste hierarchy and focussing on waste prevention. Since mixed waste technologies such as Eco Deco do not adhere to the waste hierarchy, we do not support them.

8. About Friends of the Earth Scotland

Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

For further information please contact:

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¹ News release “New Vision For Waste” by Scottish Government as at 24/01/08

<http://www.scotland.gov.uk/News/Releases/2008/01/24145725>

² SEPA National Waste Plan 2003 http://www.sepa.org.uk/nws/guidance/nwp_html/2.1.html#1

³ Waste Aware Scotland, Waste Figures 2006-2007 http://www.wasteawarescotland.org.uk/html/aboutwaste_figures.asp

⁴ Scottish Government ‘Household Waste Prevention Action Plan’ Feb 2007

<http://www.scotland.gov.uk/Publications/2007/02/23113217/16>