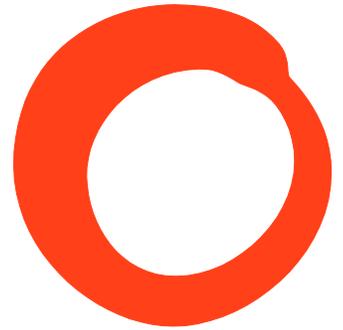


June 2013

Submission to the Welsh Government

in response to

**Consultation Document
WG18016:
Waste Prevention Programme
for Wales**



**cyfeillion
y ddaear
cymru
friends of
the earth
cymru**

Summary

1. Friends of the Earth Cymru supports a waste prevention target for both household waste and industrial/commercial waste. The targets – in combination with reuse, recycling and composting – must be sufficient to attain the 2050 zero waste target.
2. There is a missed opportunity to legislate for a deposit system for drinks cans and bottles. Such a system would both lead to significant waste reduction and strongly message some of the key points that the Welsh Government has identified to work on around reuse campaigns, sustainable consumption, household reward schemes, working with retailers and encouraging eco-innovation.
3. Other opportunities for improvement include tackling nappy waste and direct marketing that exploits legislative loopholes making it impossible to stop.

Consultation questions

4. HW3: A deposit system for drinks cans and bottles would strongly message some of the key points that the Welsh Government has identified to work on around reuse campaigns, sustainable consumption, and household reward schemes, alongside working with retailers and encouraging eco-innovation. It would also reduce the tendency to over-package drinks containers by providing a much stronger incentive to drinks manufacturers to reduce the weight of containers that will be reused multiple times. A deposit scheme would also tie in with extended producer responsibility, a key principle of Welsh Government waste policy.
5. IC4: Consulting on the possibility of a deposit scheme for cans and bottles would be a direct means of encouraging business engagement in eco-innovation. The potential for export of Welsh business and technology would be dramatic because as with the carrier bag charge a successful intervention shows high replicability in other UK jurisdictions.
6. G3: We assume that the justification for excluding glass and metal from the waste prevention messaging is twofold: they are not biodegradable (and do not therefore count towards the Landfill Directive biodegradable municipal waste definition); and they are easily recyclable. However, Friends of the Earth Cymru considers this to be a missed opportunity. Glass is heavy and metal is plentiful in the waste stream and they contribute 4% each by mass to residual waste¹.
7. G3: It is difficult to conceive that a deposit system for drinks cans and bottles would not be an “*opportunity for waste prevention [that is among the] greatest*”. Dense plastic bottles comprise 2% by weight of municipal solid waste in Wales², glass bottles are 4-5%³ and presumably a high proportion of metal cans (2% of MSW) are drinks cans. We would be grateful if the Welsh Government could provide

¹ WRAP, May 2010, [The composition of municipal solid waste in Wales](#), page 2

² WRAP, May 2010, [The composition of municipal solid waste in Wales](#), page 4

³ WRAP, May 2010, [The composition of municipal solid waste in Wales](#), page 19

their viewpoint on this and to indicate whether or not a programme of work should be initiated along these lines.

8. G3: Although a deposit scheme is highlighted here in waste prevention terms, it is worth noting that glass packaging, plastic bottles and metal cans each comprise between 5 and 10% of litter⁴. A deposit scheme therefore has significant litter-reducing potential.

9. G3: Friends of the Earth Cymru assumes that the omission of a deposit scheme is the result of the finding by the Phase 2 report that:
“Other measures to reduce consumer packaging – for example deposit return schemes or direct packaging taxes – would likely need UK-wide implementation and could be in conflict with UK-level producer responsibility agreements”⁵.
 This statement is simply an unsupported assertion. It is our belief that deposit return schemes would be implementable on a Wales-only basis, in much the same way as the carrier bag charge was introduced separately in Wales, and as deposits vary between US states (some states being without deposit legislation and others having 5c or 10c deposits).

10. G3: The household waste reduction target of 1.2% of the 2007 baseline each year to 2050 only takes us to a 51.6% reduction in household waste⁶. Presumably the remainder of the waste would be dealt with through reuse, recycling and composting; if this is not the case, and the Welsh Government has ambitions to be dealing with substantial quantities of waste through landfill or incineration then this should be made clear.

11. G3: It is difficult to determine the approach of the Welsh Government to disposable nappies. The consultation states that there is *“little potential for reduction”* in the reduction of nappies and clinical waste, despite them being one of the high impact wastes that *“should be the focus for greatest efforts in waste prevention”*. Friends of the Earth Cymru considers this a peculiar dichotomy of approach – the Welsh Government apparently conceding defeat over achieving reductions in one of the highest-impact waste streams. Evidence from well-resourced Real Nappy Campaigns, indicates that reduction in the use of disposable nappies is an achievable goal and messaging can be tied in with other waste reduction themes. Yet the consultation later (p.17) refers to ‘real nappies’ campaigning as one of the waste prevention work streams. If there is little potential for reduction, what is the purpose of a campaign? There is also a case for examining whether or not a levy should be introduced on disposable nappies to account for the waste management problems they cause.

12. G3: We are disappointed that the Welsh Government’s aspiration is limited to:
“identify ways to maximise the effectiveness of measures already in place, rather than find additional new measures”.
 This appears to be a particularly unambitious approach to the top of the waste hierarchy, which is acknowledged to be the point at which interventions have most impact.

⁴ WRAP, May 2010, [The composition of municipal solid waste in Wales](#), page 31

⁵ BrookLyndhurst, July 2012, [Waste prevention in Wales](#), page 71

⁶ Unless the reduction is cumulative, in which case the consultation’s term “absolute reduction of 1.2%...” is misleading

13. G3: The consultation notes that while progress on recycling targets and waste reduction is maintained, *“there is no need for charging [for waste collection and disposal] to be introduced”*. It would be helpful to have clarity on the criteria which will be used to determine whether or not such charges will be considered.
14. G3: Mailed items are among the items that contribute to preventable paper and card waste. The principal Welsh Government resolution for this appears to be a ‘say no to junk mail’ campaign. However, there are substantial elements of junk mail that it is currently impossible to ‘say no’ to – those addressed to “The Householder” or “The Occupier”. The Welsh Government should press the UK Government for action to remove the legislative loophole that allows these unsolicited items to remain uncaptured by the Mailing Preference Service opt-out, and examine the scope for Wales-only legislation.
15. G3: Section 4.1.2.2 states that:
“construction output in Wales... has remained significantly below the UK average since [2008]”.
However the graph used to justify this apparently uses one point in time as the baseline and is not therefore a credible indicator. Statistically it is good practice to use an average of, say 2 years’ worth of UK and Wales output as the baseline.