

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Viridor	Response from Viridor
EB 49	EB 49



Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



INTRODUCING VIRIDOR

Part of the FTSE 250 Pennon Group, Viridor's stated purpose is to give resources new life, transforming 'waste' into high quality recyclables, raw materials and energy.

Viridor supports 100 UK local authorities and over 30,000 customers through a network of 320 facilities. Viridor is currently investing over £1bn in 'next generation' social infrastructure to translate 'zero waste' policy into practice.

Each year Viridor transforms over 1.5 million tonnes of materials into high quality recycle, and yet more into more than 900 Gigawatt hours of renewable energy. In total it safely and efficiently manages around seven million tonnes of recyclables and waste materials for customers from all sectors across the UK.

Employing over 3,000 people, Viridor strives to be an environmentally, socially and economically sustainable business. All sites and services are operated under the company's business management system incorporating the highest environmental, quality, health and safety, and energy management standards.

For more information, please visit www.viridor.co.uk

EXECUTIVE SUMMARY

1. The comments here submitted relate to proposals under Part 4 of the Environment (Wales) Bill 2015.
2. The proposals put forward under RE1 of the recent Welsh Government consultation on proposals for an Environment Bill have significant potential to disincentivise the collections market.
3. Wales is already achieving impressive recycling targets and Welsh Ministers have sufficient powers in this area.
4. Local authorities and businesses should be free to make decisions based on local needs and circumstances.
5. The proposals regarding further limits on inputs into energy plants are premature and over-the-top, especially as there are currently only two EfW facilities in Wales. They show a lack of faith and/or impact assessment in existent policy measures.
6. Government policy should not have the effect of reducing the appetite for private sector investment in Wales, while potentially limiting energy security and reducing the generation of renewable energy. Wales needs business choice, investment, jobs and energy. The approach here is overly onerous on those parties with little or no influence on the presentation of material for landfilling or recovery.
7. A better focus from the Welsh Government would be on how the proposals for an Environment Bill would affect the current and growing issue of the export of waste (as 'Refuse Derived Fuel' or Solid Recovered Fuel) for energy recovery.
8. Viridor would therefore welcome action regarding: (a) sites storing material over and above their permitted capacity; (b) sites accepting material for which there is no available market, leading to abandonment.



COLLECTION AND DISPOSAL OF WASTE

9. While the principle of asking for recyclables to be presented separately by individuals and businesses is generally sound, it may not be appropriate for an increased range of materials to be presented and collected in a pre-segregated manner by all parties.
10. A 'one size fits all' approach would be unnecessarily costly and cumbersome on collectors and businesses alike, and should not be demanded of all councils, businesses, commercial operators and industry regardless of circumstances.
11. The proposal of regulation by NRW is also unclear with regard to how enforceable the proposals would be. They would deliver additional functions, cost and burden on the regulator. Viridor is concerned that this diversion of resources could be to the detriment of NRW's focusing on dealing with and preventing real waste crime in the form of blatantly illegal and environmentally damaging activity which is still widespread (with a high risk maintained by current economic and legal drivers). The fact that Welsh Ministers already have powers under existing legislation also serves to underline the over-the-top nature of these proposals.
12. The greatest levels of participation in recycling are achieved when collection systems are straightforward, easy and convenient for people and businesses. Urban (and other) households and SMEs especially often do not have the space or storage ability for multiple containers for fully source segregated systems. This, along with the additional complication and media/community/political resistance, can result in lower participation rates.
13. A choice of systems should be available for local authorities and businesses to identify and procure the most appropriate and cost-effective systems for their local conditions, needs and circumstances, rather than choice being restricted.
14. The potential political impact of enforcement action against businesses for non-compliance, where wider public benefit is unclear, also needs to be considered as a specific factor.
15. This specific proposal appears to be lacking in pragmatism, carrying a risk of reputational damage to Welsh Government. Such proposals show a lack of faith and/or impact assessment in existent policy measures.

OVERARCHING QUESTION

16. Any linkage between the different bills would appear to be indirect and somewhat vague. It is evident that they are intended to be complementary, although some of the specific and onerous requirements of the Environment Bill may be counter-productive.

FINANCE QUESTIONS

17. The proposals are premature as there are currently only two EfW facilities in Wales, one being a low capacity plant using novel technology with a chequered history of operational efficiency, the other utilising robust technology but not yet operational.



18. The proposals introduce additional cost, bureaucratic burden and uncertainty at a delicate investment point for vital infrastructure in Wales and the delivery of the Wales Waste Strategy itself. This additional cost and bureaucracy does not appear to have any corresponding economic, environmental or social benefit. What's more, it is unclear as to the enforceability of the proposals without putting undue resourcing (cost) onto the regulator.
19. It would be unfortunate if Government policy had the effect of reducing the appetite for private sector investment in Wales, whilst potentially limiting energy security and reducing the generation of renewable energy. Wales needs business choice, investment, jobs and energy. This approach could cause unwarranted market distortion, reduced investment in facilities in Wales and reduced levels of renewable energy generated.

ADDITIONAL COMMENTS

20. As stated above, while the principle of asking for recyclables to be presented separately by individuals and businesses is sound, it may not be appropriate for an increased range of materials to be presented and collected in a pre-segregated manner by all parties.
21. A better focus from the Welsh Government would be on how the proposals for an Environment Bill would affect the current and growing issue of the export of waste (as 'Refuse Derived Fuel' or Solid Recovered Fuel) for energy recovery.
22. The Welsh Government may wish to clarify this, particularly as these proposals seem designed to discourage investment in EfW infrastructure in Wales, counter to the Wales Waste Strategy, and to actively encourage waste export which is not subject to these provisions.
23. Viridor would therefore welcome action regarding: (a) sites storing material over and above their permitted capacity; (b) sites accepting material for which there is no available market, leading to abandonment. Viridor considers that the current regime for financial provision is adequate to cover all reasonable foreseeable circumstances and associated costs.
24. Viridor would be pleased to give oral evidence relating to this submission to the Committee over the summer, if invited.