

RECAP response to the Consultation on a Strategy for Hazardous Waste Management in England

Principle 1 – the waste hierarchy

Question 1: Do you support principle 1? If not please explain, and what changes, if any, you think are needed.

Cambridgeshire County Council supports the principle of adhering to the waste hierarchy.

Principle 2 – Infrastructure provision

Question 2: Do you support principle 2? If not please explain, and what changes, if any, you think are needed.

We agree with the approach to reduce the number and length of movements of hazardous waste by developing a distribution of facilities more closely matched to regional arisings, as outlined in Para. 36, as it makes sense to place facilities where the need is greatest. However, Government would need to ensure that the UK provided a competitive marketplace so that costs for treatment competed with those in Europe and the rest of the OECD.¹

Question2a: Do you agree that the needs for hazardous waste infrastructure for England identified in Waste Strategy 2007 at Annex 1 continue to exist and if not, how should they be amended?

The needs for hazardous waste infrastructure identified in Annex 1 do not provide sufficient detail to plan for the facilities required.

Reliable data should be analysed at a national level to ensure the right level of facilities are provided for this waste stream, which is mostly relatively small. The Environment Agency's Hazardous Waste Interrogator provides the required information on quantity and movements of these wastes to carry out this work.

There is no provision for Hazardous Waste landfill through either new site provision or existing non-hazardous waste sites in Annex 1. Government need to recognize that these will be required as a last option through the revised WFD.

Principle 3 – Reduce our reliance on landfill

Question 3: Do you support principle 3? If not what changes, if any, you think are needed.

Application of the waste hierarchy and landfill tax with the associated escalator will not be enough to discourage landfilling of hazardous waste. Government needs to invest in research to find treatment solutions for hazardous waste. In addition, alternatives in the manufacturing process needs to be developed to limit the amount of materials going to landfill, for example using wastes in the manufacturing process that are recyclable or recoverable.

Principle 4 – No mixing or dilution

Question 4: Do you support principle 4? If not please explain, and what changes, if any, you think are needed.

Cambridgeshire County Council supports the no mixing or dilution of hazardous waste.

Defining organic and inorganic in regards to this principle is scientific and is for Government to define. Local Authorities would need to know a definition for materials such as oil or clinical wastes.

¹ Organisation for Economic Cooperation and Development

Principle 5 – Treatment of organic hazardous wastes

Question 5: Do you support principle 5? If not please explain, and what changes, if any, you think are needed.

Cambridgeshire County Council has a contract in place to incinerate clinical waste (without energy recovery). Under this proposal, there is little incentive for operators to retrofit for energy recovery, especially if the facility is not of a size that it would be economically viable. Government should provide incentives, such as tax breaks or funding so that retrofitting becomes more desirable.

Principle 6 – End reliance on the use of Landfill Directive waste acceptance criteria derogations

Question 6: Do you support principle 6? If not please explain, and what changes, if any, you think are needed.

We support this principle of ending the reliance on derogations, however, two years will not be enough to develop alternative treatments considering the time it takes for planning, building, licensing and technology to be developed.

Principle 7 – Treatment and landfilling of hazardous waste

Question 7: Do you support principle 7? If not please explain, and what changes, if any, you think are needed.

Cambridgeshire County Council supports this principle.

Decision Trees Consultation Questions

Question 8: Do you think that the decision trees support a) the principles of the Strategy for Hazardous Waste Management in England and b) the revised Waste Framework Directive hierarchy?

No, the decision tree in Figure 3 and Figure 5 do not include thermal treatment with energy recovery.

Question 9: The revised Waste Framework Directive requires waste producers to consider the hierarchy when considering the management of their wastes. Do you think the decision trees will aid you in this respect?

No, see question 8.

Question 10: Are the decision trees easy to follow or is more clarity needed?

The decision trees are clear.

Question 11: Various generic waste processes have been considered in the decision trees. Are these the right processes? Have any significant processes been missed?

Cambridgeshire County Council is unable to comment.

Question 12: Are you aware of any waste streams that would not be appropriate for the decision trees? Are you able to describe waste streams and provide estimated quantities?

Cambridgeshire County Council is unable to comment.

Question 13: How do you think waste streams that are not appropriate for the decision trees should be managed?

Cambridgeshire County Council is unable to comment.

Question 14: Do you think that a definition of 'organic' and 'inorganic' is needed, and if so how do you think this should be defined?

A definition is required and Government should provide this through a rigorous scientific analysis.

Question 15: Do you think additional guidance for use of the decision trees is required? Should this guidance be based around waste streams?

Yes, guidance would be useful to aid in the use of these decision trees and should be based around waste streams.

Question 16: Do you support this timeline for implementation?

Cambridgeshire County Council supports this timeline.