

Consultation Response Table for the Perth and Kinross Waste Management Plan

A public consultation exercise was launched 15th December 2009 to gather views on the Draft Perth and Kinross Waste Management Plan. The consultation closed 29th January 2010.

The table below provides a summary of the responses received by the Council. Where appropriate the Council has provided comments. A blank cell denotes that no comment or action was deemed necessary.

Response From	Summary of Response	PKC Comments/Action
1. Is there any additional information/actions relating to municipal waste composition and arisings that you feel should be included in the Plan?		
Mrs Lesley Cook 4 Bells Croft, Abernethy	Yes	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	<p>Good to see a commitment to conduct annual MSW waste composition studies (Action 3).</p> <p>Recommend auditing recyclate merchants to ensure adequate Transfrontier Shipment of Waste compliance.</p> <p>In addition to the information provided on current and projected waste arisings, information on the existing waste management facility capacity and future waste facility capacity requirement would be beneficial. This information can be used illustrate the shortfall between the current waste management facility capacity available, and what will be required in the future (taking into account recycling target, requirement to reduce landfill to 5% etc), and could help inform decisions/discussions on the type and number of facilities that would be required to treat/manage the shortfall.</p>	<p>The Council will continue to ensure it meets all legal requirements relating to the transfer of waste and recyclates to merchant waste management facilities. The Council meets with its contractors on a regular basis and requests information on end uses of recyclates processed by the contractor. Information will continue to be sought on end destinations of processed recyclates.</p> <p>The Plan does not seek to identify specific sites where municipal recyclates or residual waste will be treated. The Plan commits to Set criteria for the development of waste treatment and management facilities through the Local Development Plan. As detailed in the Plan, the Council proposes to procure and maintain long-term contracts for processing of recyclates and treatment of residual waste. The location of these facilities will be dependent on the outcome of procurement exercises. Information on existing waste management facilities in the Council area is provided in the Tayside Strategic Waste Management Review (SWMR) carried out by SEPA in 2006. The Council support the future updating of the Tayside SWMR.</p>
Charlie Devine WRAP, Scotland	<p>In order to be consistent with other compositional waste analysis work in Scotland and to help the Council compare results with other Scottish Local Authorities, it would be helpful if any future studies were carried out in accordance with the SEPA guidance on analysing household waste (National Methodology for Household Waste Composition Analysis in Scotland) with the following three exceptions;</p> <p>1.The selection of households should be based on areas rather than a random selection within an area; this is operationally much easier to achieve and should not influence the reliability of the results (p.16 of the guidance)</p>	The Council will aim to carry out future waste analysis work in accordance with SEPA guidance on analysing household waste.

	<p>2. ACORN should be used to represent socio- demographic differences rather than the council tax band; this will ensure that the results are comparable with similar WRAP studies on which a new estimate of biodegradability will be based (p.14 of the guidance)</p> <p>3. Sub-categories should be added to the high level categories to make the analysis more useful for policy and strategy purposes (p. 5-7 of the guidance)</p>	
<p>Melanie Nicoll Dunkeld, Perthshire</p>	<p>My observations:- the volume of kitchen/food waste requires serious action. The way society is changing and the way people are eating suggests that the volume of plastic bags/film and Tetrapaks will already have risen above the percentages calculated at the time of the last waste analysis. I am most concerned about this and feel that the Council may need to focus its efforts on this, alongside national waste minimisation campaigns to tackle these elements of the waste stream.</p>	<p>The Draft Plan includes a series of waste prevention related actions. The Council will continue to support the 'Love Food Hate Waste' campaign, which targets reduction of kitchen/food waste. By carrying out regular household waste composition analysis, the Council will be able to monitor changes in the volumes of particular materials in the household waste stream.</p>
<p>John Cockram Green Cone Ltd</p>	<p>Weight-based targets as used in current EU legislation are fairly easy to understand, and in the context of waste reduction and recycling they are relatively easy to measure but are not always applicable to the wider climate change agenda or the potential for Zero Waste to generate societal change in behaviour and attitudes.</p> <p>In our view the Plan makes insufficient allowance for the recent Climate Change (Scotland) Act in stimulating progress towards the emergence of a low carbon based economy, whereby progress in waste minimisation actions will be measured according to carbon outputs as part of a national Zero Waste Plan to comply with the ambitious targets set in the Climate Change Act.</p> <p>A move to include carbon measurement might also reflect the fact that at present there appears to be a focus on only measuring the carbon impact of landfill emissions when, in the case of biodegradable municipal waste (BMW) what is also required is a measurement of the whole process of centralized collection and AD treatment as well. Proving carbon savings should be a key criteria for Perth & Kinross Council's long term waste prevention strategy.</p> <p>In terms of home composting, we have strongly urged the Scottish Government to end the current moratorium on introducing the Landfill Allowance local authority trading scheme, and in particular to ensure that home composting is specifically incentivised under LAS as an urgent priority to divert food waste from the municipal waste stream. We see this as enabling Perth & Kinross Council to reduce its exposure to potential financial penalties if the LAS is re-activated as from 2011.</p>	<p>The final version of the Council's Plan will take into consideration Government proposals to develop a carbon measurement (carbon metric) for Scottish recycling performance. While the Plan does not directly make reference to measuring carbon outputs, by implementing the actions detailed in the Plan, it is expected the Plan will have a positive impact in terms of carbon output.</p> <p>An action is included in the Draft Plan to carry out a carbon impact assessment of waste and recycling collections.</p> <p>Household waste composition analysis will be used by the Council to estimate the amount of food waste in general/residual waste. This will not be sub-categorised into avoidable, potentially avoidable, and unavoidable. Support would be required by National support bodies to enable such studies to be undertaken.</p>

	<p>In general terms we welcome Perth & Kinross Council's intention to undertake an annual compositional analysis of municipal waste. This will allow greater understanding of the nature of residual waste across the Council area, including quantities and seasonality. In the case of BMW these would particularly help to quantify the volumes of food waste that can be categorised into avoidable, potentially avoidable, and unavoidable. It is the last category which particularly interests Green Cone Ltd.</p> <p>The latest data published by WRAP in its report Household Food & Drink Waste (November 2009) estimates that 8.3 million tonnes of food and drink waste is generated by UK households. Of this, some 570,000 tonnes arises in Scotland, two thirds of which could have been avoided. Of the 1.5 million tonnes of unavoidable UK food waste, we might therefore extrapolate a Scottish figure of some 103,000 tonnes. This in itself is a significant volume which according to the latest WRAP data represents 18% of the current total food waste stream. It is also to the 21.56% fraction of kitchen food in all household waste as stated at Appendix 4 in the Council's Plan.</p> <p>We would highlight the fact that at present (November 2009) WRAP can only estimate the volume of food waste that is home composted (combined with the amount fed to animals) at around 700,000 tonnes across the UK. No comparable figure exists for Scotland. A far more rigorous approach to data collection and publication in this area would help recognise and incentivise the efforts of home composters and food waste digester users (FWDs).</p>	
<p>Doug Boyle Scottish Organics Services</p>	<p>Yes. Where is the analysis of the composition of the residual waste AFTER the inception of the 3-bin system? I understand that the data presented in Appendix 4 of the draft WMP is a "by mass" breakdown of the original residual bin when only garden waste recycling was on offer. I believe much more robust data on the composition of the residual waste stream is required in order to evaluate the technology options (the recoverable energy, the percentage of the biodegradable fraction etc. are all required in order to assess the merits of various systems or combinations of technologies), not just the pure quantity. The figures after introduction of the 3-bin system should have been requested by consultants Halcrow and should have been included in this draft for consultation (not just proposed for the "Final" plan).</p>	<p>A household residual waste analysis was carried out in March 2010 and will be included in final version of Plan. A residual waste composition analysis will be carried out on an annual basis.</p>
<p>2. Do you agree with the waste prevention actions identified in the Plan?</p>		
<p>Mrs Lesley Cook</p>	<p>Yes</p>	

4 Bells Croft, Abernethy		
Mr Colin McLeod 111 Balhousie Street,, Perth	Yes	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes. Welcome indicator of kg/hh/year to track waste arising.	
Charlie Devine WRAP, Scotland	We fully support agree with the previous actions carried out by the council	
Lorraine McCauley CRNS	<p>Yes. The CRNS stance is that the move towards a Zero Waste society requires a zero waste approach to all aspects of society and how it behaves. Therefore all actions should be considered valid and should be tried. Therefore all of the actions are worth pursuing in order to achieve that aim.</p> <p>For example, OVAM, the Flanders Public Waste Agency has run an environmental consumption campaign that educates the public about the environmental impact of certain product streams such as WEEE and paint. It raises awareness of the life cycle impact of these products and supports producers of new, environmentally friendly products to get their products onto the market</p> <p>The CRNS supports the proposal in the Scottish Zero Waste Plan for tertiary education centres to have waste prevention plans. If agreed upon this would extended to tertiary education centres in Perth and Kinross. Although the Eco-schools programme is doing an excellent job, it is not obligatory for schools to undertake activities to reduce waste.</p> <p>A new educational scheme should be introduced to extol the virtues of better products & how much cheaper it is in the long run to buy quality products that can last, be serviced to extend use & supply of spares or upgrade parts to further extend their life.</p> <p>The CRNS would also ask the Perth and Kinross Council (PKC) to ensure, that when new schools are built, that recycling facilities have been incorporated. This was not the case for many of the schools that were built under the PFI programme in Scotland. These schools now have to negotiate with the contractors that own the buildings if they want to introduce recycling facilities. This can act as a barrier.</p>	<p>The Council acknowledges the points and information provided.</p> <p>The Council would welcome waste prevention plans for tertiary education centres. However it is felt that new initiatives, such as changing the focus of the Eco-schools programme, would need to be co-ordinated at a national level</p>

Melanie Nicoll Dunkeld, Perthshire	Yes, but see also below (Q3).	
John Cockram Green Cone Ltd	<p>We would like to see greater clarity in the Plan on what each level of the waste hierarchy means. In terms of home treatment of BMW, we would particularly welcome a clear commitment from Perth & Kinross Council on a long term vision for home composting in general, and use of FWDs in particular, which ‘fits’ into the waste hierarchy. Currently, interpretation of this issue varies among different stakeholders. In the Household Waste Prevention Plan, both home and community composting were regarded as ‘waste prevention’. Green Cone Ltd considers that home composting and food waste digestion should still be included under waste prevention according to the Waste Framework Directive definition, i.e. converted food residues and garden material are viewed as a resource by householders committed to home composting, and thus waste is prevented as there has been no intention to discard this material for Council collection.</p> <p>A clearer distinction between reuse and recycling (with the clear message that reuse is better than recycling) is essential. We strongly welcome the use of a new waste hierarchy diagram in the Plan whereby the largest portion as prevention is shown at the top, working down to the smallest portion as disposal at the bottom – i.e. an inversion of the current pyramid design.</p> <p>We strongly believe the link between the waste hierarchy and the carbon impacts/climate change agenda should be actively promoted with particular reference to FWDs. Green Cone promotes its products as the ultimate low carbon solution to household food waste, on the grounds of reduced greenhouse gas emissions from Council collection vehicles and landfill. Overall, the waste hierarchy needs to be as familiar to the general public as the recycle loop logo.</p>	<p>The Council through its waste education and awareness campaigns will continue to communicate the waste hierarchy and the distinction between reduce, reuse and recycling (and that reduce and reuse is better than recycling).</p> <p>The Council currently considers that home composting and food waste digestion are part of waste prevention.</p> <p>The Council will support the implementation of the national waste prevention actions at local level. This includes work on home composting.</p>
Doug Boyle Scottish Organics Services	Yes but the importance of the food residues needs to be emphasised. Segregating and recycling food residues is known to raise awareness of wasteful purchasing and cooking practices and to generate behavioural change leading to waste prevention. This needs to target ALL households, not just those with garden bins!	<p>The Council will support the implementation of the national waste prevention actions at local level. This includes work on the ‘love food hate waste’ campaign.</p> <p>The Council will take cognisance of government proposals for mandatory requirement for source separated food waste collections.</p>

3. Are there any additional waste prevention actions that should be considered in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No - seem quite comprehensive as is. If appropriate funding available and listed actions delivered with corresponding drop in waste arising, that would be the time to identify additional actions.	
Charlie Devise WRAP, Scotland	We would also suggest working closer with the large retailers to try and influence the buying habits and to access front of store opportunities to promote activities such as love food hate waste etc	The Council would support such an approach at the local level as appropriate.
Lorraine McCauley CRNS	<p>The CRNS believes that Waste Prevention is crucial if we are to move towards a Zero Waste society in Scotland. That means eliminating waste from the product design stage through to eliminating waste at the post consumer stage. That means using all the available tools to push the Waste prevention message including Producer and Extended Producer Responsibility to get financial contribution to fund collections and to get producers to improve design.</p> <p>Scotland should be establishing itself as the vanguard of green design. Green design should be incorporated into design courses at Scotland's universities and colleges. This would create significant jobs in the longer term.</p> <p>The CRNS would encourage PKC to "ensure that the public sector lead by example on waste prevention" as stated in the Zero Waste Plan for Scotland. For example, Eco-Schools and Compost Doctors should work in partnership to assist every school in Perth and Kinross to develop best-practice composting as there is the huge potential for behavioural change for future generations. The benefits of both home composting and on-site composting by public and private sector organisations in terms of the potential to grow local food should be promoted.</p> <p>The CRNS recommends that PKC use the household waste compositional analysis outcomes as additional evidence to inform all existing and new waste prevention campaigns.</p> <p>The CRNS remain convinced that the use of real nappies can move into the mainstream and working with the NHS would assist in that process. There appears to be a strong link between the promotion and use of real nappies and the creation of a real nappy market and the move by disposable nappy manufacturers to improve the environmental impact of their products.</p>	<p>The Council would support such an approach at the local level as appropriate.</p> <p>The final Plan will include an action for the Council to undertake an internal waste management review to identify opportunities for further improving the way waste is managed within the Council.</p> <p>With regards to Eco-schools, 111? schools and nurseries are registered with Eco Schools in Perth and Kinross and additional support and information relating to waste management is available to every school.</p> <p>Perth and Kinross Real Nappy Network have made a significant impact on the use of real nappies in the area and are now working with the Community Midwife Unit at Perth Royal Infirmary in a partnership where every new baby born in Perth and Kinross in 2010 will receive a starter pack of real nappies.</p> <p>The Council's Waste Services section is consulted on relevant planning applications, and provides advice to developers to ensure adequate provision is made for collection, segregation and storage of waste within new developments prior to treatment.</p>

	<p>The CRNS are of the opinion that all new builds (eg, flats, public sector organisations, businesses etc) should be designed with scope for on site composting facilities to encourage waste prevention. This would be in line with Para 60 of the Climate Change Act with regard to the government's obligation to reduce the GHG emissions associated with new buildings.</p>	
<p>Melanie Nicoll Dunkeld, Perthshire</p>	<p>Initiatives such as the charity shop map are laudable but I feel further action is needed to encourage people to recycle and reuse clothing, household goods etc and also to choose more reusable products. I would like to see more community-based charity/re-use shops.</p> <p>The network that currently meets to develop opportunities to promote the activities and benefits of the charity shop sector could be expanded to include interested individuals who are keen to develop such initiatives within their own communities and not necessarily allied to large national charities.</p> <p>Educational work to encourage waste minimisation and reuse needs to reach out to a broader audience than just schoolchildren - although they can influence their parents it is the parents that need tackling so creative mechanisms need to be found to get the message out to them.</p>	<p>The final Plan will detail the Council's commitment to engage with the community sector and support the development of projects that promote sustainable resource management in the local area.</p>
<p>John Cockram Green Cone ltd</p>	<p>Waste prevention is at the top of the waste hierarchy and needs to be given more prominence in the Plan relative to waste recycling or the treatment of residual waste. Household food waste digesters reduce waste arisings in two ways. Firstly, by treating all food waste at home, food waste digestion avoids the mobilisation of this material into the municipal waste stream. Secondly, the use of FWDs visualises to householders the amount of residual food waste they generate, which leads to behavioural change and a reduction in the amount of waste generated.</p> <p>Despite several years of discussions with Green Cone Ltd, Perth & Kinross Council has yet to give any formal recognition of the strategic role played by household FWDs in promoting waste prevention and how they encourage people to recycle more actively, linked to their considerable educational value. When will the Council address this issue?</p> <p>We have stated elsewhere that encouragement needs to come from the Scottish Government to regulate on waste prevention under the new Climate Change Act, including a new target under the Zero Waste action plan to encourage home composting.</p> <p>In support of this we are urging all Councils to endorse the expansion of the Master Composter Programme so that Scottish householders can get practical local advice on</p>	<p>The Council will support the implementation of national waste prevention actions at local level. This includes work on home composting and the 'love food hate waste' campaign. The Council considers promotion of food waste digesters should be part of national home composting campaign.</p> <p>The Council will take cognisance of government proposals for mandatory requirement for source separated food waste collections.</p>

	<p>home composting including the use of food waste digesters. Home composting not only prevents waste going to landfill but also helps to reduce emissions associated with living accommodation, as outlined in Paragraph 64 of the Climate Change Act. In our view, WRAP Scotland should be mandated to achieve this coverage within a 3 year timetable working with Community Recycling Network Scotland as the support service provider, with a parallel obligation on all Councils to work actively with local Master Composter schemes built into the Single Outcome Agreements with the Scottish Government.</p> <p>We note there is currently no Master Composter Scheme anywhere within the Perth & Kinross Council area. This issue needs to be addressed under the Plan, based on adoption of best practice from existing Schemes elsewhere in Scotland supported by CRNS.</p> <p>We would encourage the Council to ensure that, in terms of the carbon footprint of its own properties, it leads by example on food waste prevention, including the use of food waste digesters for smaller offices and other establishments. The benefits of FWD use in terms of soil fertilisation and composting to help grow local food should also be actively promoted where possible. From our own experience, we would recommend that the Eco-Schools and Compost Doctors Scotland programmes should be actively involved in working with every school in the Perth & Kinross area to develop best-practice composting as there is the huge potential for behavioural change for future generations. There are some outstanding examples of good practice in individual Eco-Schools in the area and these deserve greater recognition from politicians and the media.</p>	
<p>Doug Boyle Scottish Organic Services</p>	<p>As mentioned above in Q.2 plus:</p> <ul style="list-style-type: none"> • Include Compost Doctors – Scotland in PKC-supported initiatives, • Pay more attention to Cittaslow objectives "... working to preserve their local environment by promoting less frantic lifestyles, local goods and services, individuality of their community and encouraging active participation in community life." – embodies both Producer and Proximity principles, • Mention in WMP of PKC Internal Audit in 2006 but no data nor subsequent audit. This should be undertaken, and published, annually. • Business Waste Management Plans – these should start with those establishments from whom PKC currently collect. There needs to be some incentive since in the end those taking action are helping PKC to reduce exposure to penalties. 	<p>The final Plan will include an action for the Council to undertake an internal waste management review to identify opportunities for further improving the way waste is managed within the Council.</p> <p>Perth & Kinross Council to facilitate a Business Waste Minimisation Project (BWMP) that will demonstrate locally the financial and environmental benefits of waste minimisation and resource efficiency to local businesses.</p>

4. Do you agree with the actions identified in the Plan for improving municipal waste recycling rates?		
Mrs Lesley Cook 4 Bells Croft, Abernethy	Yes	
Mr Colin McLeod 111 Balhousie Street,, Perth	Yes	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	<p>Yes, comprehensive / ambitious list of actions. Support the targets contained within the WMP on recycling and composting in order to achieve ZWP objectives. However, the document makes reference to requiring additional facilities to achieve these targets (page 30, section 6.5 page 31). Information on where these should be located would be beneficial so that local development plans can support the location, and the achievement of the target. If the preference is not to specify locations or areas of search for such facilities, or to leave to the development plan process, there may be some benefit in identifying the type of location where such facilities would preferably be located.</p> <p>SPP10 (Planning Policy for Waste Management) will soon be superseded by a single Scottish Planning Policy Document, however it does include a "model policy" which could be used to indicate where waste facilities would be appropriate:</p> <p>Allocations for waste management installations are appropriate generally on the existing or planned supply of employment and industrial land and specifically on:</p> <ul style="list-style-type: none"> • Class 5 General Industrial land (where additional protection can be provided by Pollution Prevention and Control (PPC) and through more stringent controls over noise, vibration and hazardous substances); and in the case of waste transfer stations and materials recycling facilities; • Class 6 Storage or Distribution land (where the distinction with Class 5 is on the basis of a higher level of lorry or van movements). 	<p>It is not possible to specify where additional facilities should be located as this will be dependent on the outcome of carrying out procurement exercises for treatment/processing of waste and recycles.</p> <p>The Plan commits to Set criteria for the development of waste treatment and management facilities through the Local Development Plan.</p>
Charlie Devine WRAP, Scotland	We fully support the comprehensive actions identified by the Council	
Lorraine McCauley CRNS	YES. The CRNS recognises the important role of local authorities in handling municipal waste and in diverting municipal waste from landfill. The key actions outlined in the plan to improve municipal recycling and composting waste are welcomed and recognise the	

	ongoing development that needs to happen with municipal waste streams if we are to achieve zero waste.	
Melanie Nicoll Dunkeld, Perthshire	<p>Yes, but note the following:- Community Waste Advisors need to work with all sectors of the population and not just in those areas where there is poor/low performance in terms of the take up of the new kerbside recycling service. Whilst it is important that recycling rates rise, it is also vital that householders are constantly reminded of the need to rethink their whole attitude to waste and for them to try to reduce their waste by buying less and by using more reusable products in the first place. This may require the Council to increase its budget in the area of community waste education.</p> <p>I strongly support the trial of collecting materials at Friarton for possible reuse. I would be keen to see some facility at all Recycling Centres whereby the public could remove articles that they are able to reuse.</p> <p>I believe that further work could be done on signage and advertising campaigns at/near Recycling Centres (and also on RCVs) to get across the waste minimisation/recycling message.</p>	The points raised have been acknowledged.
John Cockram Green Cone Ltd	<p>As shown in Appendix 4 of the Plan, 21.56% of residual household waste in the Perth & Kinross Council area comprises kitchen waste. If a higher volume of this fraction was eliminated from the waste stream through home treatment at source using FWDs, in statistical terms it would lead to a higher percentage of a smaller total of waste arisings being accounted for by the Council's municipal recycling services.</p> <p>Other Council areas in the UK that have developed systems to reduce food waste through the home treatment route have also recorded decreases in overall waste arisings as people have changed their purchasing habits once they see the amount of food they actually waste. This bears out independent research among FWD users, commissioned by Green Cone Ltd.</p> <p>Green Cone has long argued that there should be a multi-pronged approach to dealing with food waste, and there is no one single solution. While we strongly support the further development of programmes for home composting and the Master Composter and Compost Doctors Scotland Programme, we also recognise a long term role for local authority kerbside collection and treatment methods such as in-vessel composting and anaerobic digestion.</p> <p>While we support the aims of the Love Food Hate Waste public awareness campaign in drawing attention to the problem of avoidable food waste fraction, we also ask the</p>	<p>The points raised have been acknowledged.</p> <p>See response by Council to Question 2.</p> <p>The Council will take cognisance of government proposals for mandatory requirement for source separated food waste collections. However, it is not currently feasible for the Council to provide kerbside food and garden waste collection to more remote parts of the Council area. The Council will promote home composting to households in these areas.</p>

	<p>Scottish Government's to increase its recognition of the key role played by home composting in dealing with the unavoidable fraction.</p> <p>Green Cone Ltd broadly welcomes the actions outlined in the Plan to improve municipal recycling and composting of waste. In relation to the extension of kerbside collections, we would argue that under Article 11 of the revised Waste Framework Directive, the Council should encourage a roll-out based on source separation principles.</p> <p>We strongly remind the Council of the advice given to Scottish local authorities in the July 2009 WRAP report on Food Waste Collection Guidance:</p> <p><i>"Householders can save their food waste for home treatment. There are a number of possible options. Non cooked and non meat food wastes can be placed in a home compost bin, this option is suitable for about half of the food waste the average household produces. Householders may also consider using a wormery, Bokashi unit or a Food Waste Digester.</i></p> <p>Food waste digesters are suitable for all food waste including meat and cooked foods. Home treatment options represent the best practical environmental option for diverting household biowaste from landfill. "</p> <p>Accordingly, we would strongly urge Perth & Kinross Council to implement local solutions where kerbside food waste collection may not always be financially cost effective in more remote parts of the Council area. This should include direct support for householder FWD usage, to complement source segregated food waste collections elsewhere. Statistical analysis of WRAP data suggests that where food waste kerbside collections are operated, the capture rate for all household food waste arising is only around 60%, so it is essential that home treatment using FWDs is provided for where possible.</p>	
<p>Doug Boyle Scottish Organics Services</p>	<p>For the most part Yes. Complete roll-out to all households, but with substantial increase and improvement to monitoring of participation, capture and quantity and quality of residual arisings.</p>	
<p>5. Are there any additional actions for improving municipal waste recycling rates that should be included in the Plan?</p>		
<p>Mr Colin McLeod 111 Balhousie Street,, Perth</p>	<p>Much clearer labelling of kerbside bins to make it obvious which are for residual waste, and which for recycling/composting, and the materials that should go in each, to avoid contamination. Labels should be on the outside and in the lid. Clear labelling is important as there is no nationwide standardisation over colours etc,</p>	<p>During the initial trial of the kerbside recycling service bin labels were used for both the brown and blue lidded bins. Feedback from the trial suggested that this type of labelling was not required.</p>

	and the materials collected vary from place to place. This is confusing particularly for people new to the area, and the problem is compounded in flatted blocks which often have a high turnover of residents and where the bin compounds are often cramped and poorly-lit.	Appropriate information labels are used on all new communal recycling bins typically used by flatted properties.
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	As per Q 3.	
Charlie Devine WRAP, Scotland	We feel that the Council has comprehensively addressed the issues facing them and would recommend continually working with the various delivery bodies to ensure full involvement in any forthcoming initiatives and studies as well as the working with the retail sector as mentioned earlier and continuing to encourage the use of home composting as a means of dealing with garden and food waste within the confines of the household.	
Lorraine McCauley CRNS	<p>In relation to the action to extend roll-out of kerbside collections, the CRNS would argue that to achieve Art 11 of the revised Waste Framework Directive, PKC should ensure the roll-out is based on source separation principles. This would be in line with the June 09 WRAP report (Choosing the Right Recycling Collection Systems) and its findings that source separation is the best option of ensuing quality recyclate.</p> <p>CRNS would urge that PKC increase its reprocessing capacity, in areas such as food waste and plastics, action should ensure that small scale/community based capacity is included as well as big/centralised infrastructure. The CRNS would urge PKC to implement local solutions where possible. This might help prevent co-mingled garden/food waste collections by encouraging source segregated food waste collections (but in addition to full home composting support).</p> <p>Article 22 of the Revised Framework Directive states that Member States shall take measures to encourage the separate collection of bio-waste with a view to the composting and digestion of bio-waste; and the treatment of bio-waste in a way that fulfils a high level of environmental protection. The CRNS urges local authorities to implement source segregated collections of 'biowaste', and that where possible garden material and food residues are collected separately.</p> <p>The CRNS would like to urge the promotion of source segregated collections of 'bio-</p>	<p>The design and development of the Council's kerbside collection system was based upon a detailed assessment of possible multi-material collection systems for the Perth and Kinross Area. The results of this assessment undertaken showed co-mingled collections of dry mixed recyclate and garden/food waste to be the best option for the Council.</p> <p>The revised Waste Framework Directive details a requirement to set up separate collection of at least the following: paper, metal, plastic and glass, from the household waste stream by 2015. However the final approval of the Directive was accompanied by assurances from the Department for the Environment, Food and Rural Affairs (DEFRA) that there was still a place for commingling after 2015 in cases where it was deemed the "most effective means of increasing recycling rates in the local circumstances."</p> <p>The Council has entered a contract for composting of collected garden and food waste at a centralised facility. However the Council would fully consider any future community composting</p>

	<p>waste' and the use of composting and AD of source segregated material in line with the obligation on the government in Para 57 of the Climate Change Act to produce a land strategy which focuses on sustainable land use, and Para 60 and 61 which emphasise the use of surplus heat from industrial processes.</p> <p>In terms of 'biowaste', PKC should encourage 'biowaste' to be dealt with locally within communities for the benefit of those communities and their soils. PKC should ensure that increased reprocessing capacity focuses where possible on local solutions such as smallscale, community based composting and AD plants, to avoid unnecessary transportation in line with the Proximity Principle. This is particularly crucial in remote communities where all 'biowaste' should be processed within the community, minimising transportation. This will encourage compost or digestate to be kept within communities as a local resource.</p> <p>However, the CRNS would urge that the improvement of municipal recycling is not just about increasing tonnage, but must also include improvement in ethos, quality and engagement rather than just quantity or tonnage.</p> <p>The CRNS recognises that LA services such as kerbside recycling and the operation of HWRC's will continue to be a significant part of the recycling infrastructure. However to achieve a Zero Waste society, we must extend recycling infrastructure to all public spaces and places, such as events, hospitals, trains.</p>	<p>proposals.</p> <p>The application of the proximity principle for where our waste is treated has to be balanced against the requirements for an open and fair procurement process.</p>
<p>Melanie Nicoll Dunkeld, Perthshire</p>	<p>Should the Council investigate possible timber/construction industry/DIY materials waste minimisation/recycling facilities/campaigns?</p> <p>From my experience of large events (eg Etape Caledonia cycle event) the Council needs to consider expansion of its Waste Aware Events service and possibly expand this service.</p> <p>The volume of waste from eg plastic water bottles at these sorts of events is quite shocking, although the "fault" lies with the organisers and nature of the event. I would be keen for the Council to work with such events to encourage them to take a more environmentally-friendly approach and be bold and say why they are not supplying e.g. bottled water.</p>	<p>Timber, metals and inert waste skips are currently available at Recycling Centres. The final Plan will include actions to set a target of reusing, recycling/composting 80% of source segregated Recycling Centre waste by 2013 and for the Council to sign up to Zero Waste Scotland's 'halving waste landfill' commitment, which relates to construction waste.</p> <p>Further development and promotion of Waste Aware Events will be investigated.</p>
<p>John Cockram Green Cone Ltd</p>	<p>We would draw your attention to Green Cone's website facility for local authorities which offers a customised 'waste savings calculator' to demonstrate the financial savings achievable by providing a FWD based home treatment service for any given number of households. We are always willing to advise the Council further on this and we firmly believe it can and should achieve higher waste recycling rates by supporting wider use of</p>	<p>See answer to Question 4. The Council has no plans to introduce such a charging scheme.</p>

	<p>FWDs.</p> <p>As a wider observation, the UK has declined to follow the example of the Irish Republic in charging householders for uplift of municipal waste for landfill. In our view, if Scotland is to achieve its MSW recycling targets over the next 10 years, a combination of statutory drivers, funding, support and advice will be required and some consideration of positive incentives must be given, perhaps linking specified thresholds in the volume of household waste collected for recycling and a Council Tax rebate.</p>	
Doug Boyle Scottish Organics Services	<p>Constantly assess opportunities for new recycle streams.</p> <p>Introduce C-impact assessments of the benefits of all changes.</p> <p>Accelerate roll-out to multiple=occupancy properties.</p> <p>Establish a remote locality pilot trial of segregated food residue collection as part of the Community Waste Fund Initiative (? Kinloch Rannoch, Kirkmichael/Enochdhu or Comrie could be ideal opportunities?). Should include ALL food residues, MSW and C & I.</p> <p>Work with Planners to ensure segregation and recycling facilities are part of planning requirement for new developments.</p> <p>Work in hand with Low-C Communities for local strategies.</p>	The Council acknowledges the points raised. An action is included in the Draft Plan to carry out a carbon impact assessment of waste and recycling collections.
6. Do you agree with the actions identified in the Plan for improving residual waste collections?		
Mrs Lesley Cook Abernethy, Perthshire	Yes	
Mr Colin McLeod Perth	Yes	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No, as per Q3.	
Charlie Devine WRAP, Scotland	We support the actions identified by the Council for improving residual waste collections.	

Lorraine McCauley CRNS	<p>The action that seeks to recover value from bulky and special uplifts is of interest to the CRNS as one of its members undertook a bulky uplift pilot that demonstrated a 67% landfill diversion rate. The CRNS members are anxious to access the bulky and special uplifts waste stream and the CRNS are happy to work with local authorities to make that happen.</p> <p>The CRNS would agree with PKC's action to explore options, including a permit system, to control waste entering recycling centres. However, it is important that any permit system is not just about raising money, but also about culture change, by rewarding those that have separated waste before entry. Equally the CRNS would urge the PKC to also give information to those entering the recycling centres on where they can reuse/recycle their building material reuse centres.</p>	The Council plans to investigate options for changes to bulky uplift service and possible introduction of permit systems at Recycling Centres.
Melanie Nicoll Dunkeld, Perthshire	I strongly support Action 35 - the reuse of bulky uplift items and am keen to see more of these goods made available for the general public to reuse.	
John Cockram Green Cone Ltd	See answers to Questions 4 and 5.	
Doug Boyle Scottish Organics Services	Yes, but also need to monitor better and more frequently the results of innovations introduced. Improvement must be demonstrable, and demonstrated.	
7. Are there any additional actions for improving residual waste collections that should be included in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes	
Charlie Devine WRAP, Scotland	<p>We would suggest strict controls governing the availability of large residual waste bins for all households other than those with larger families and to examine the viability of collecting bulky uplifts in a way that encourages re-use and source segregation of recyclates to avoid landfill disposal of mixed materials.</p> <p>We also see the HHWRC as a major source of recyclable materials and would encourage expansion and innovation with these facilities.</p>	<p>The Council will review its Waste and Recycling Bin Policy.</p> <p>The Council plans to investigate options for changes to bulky uplift service</p>
John Cockram Green Cone Ltd	See answers to Questions 4 and 5.	

Doug Boyle Scottish Organics Services	240lt residual bins could be exchanged for 129lt where requested. Mixed Trade waste charged substantially but also reduced rates for recyclates at Recycling Centres.	
8. Do you agree with the actions identified in the Plan for the future procurement of a long term contract for treatment and disposal of residual waste?		
Charlie Devine WRAP, Scotland	We agree with the actions identified as the Council is seeking to maximise capture of recyclable materials prior to reverting to a treatment process.	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes	
John Cockram Green Cone Ltd	See answers to Questions 4 and 5.	
Doug Boyle Scottish Organics Services	Yes, with provisos below. Greater consideration of the Life Cycle C-impact is required.	
Lorraine McCauley CRNS	No, The CRNS would argue that any form of waste incineration is ultimately contrary to a Zero Waste society and particularly the view that increasingly valuable resources should not be burned. It is also our belief that burning is facilitated by co-mingled collections that undermine the quality of recyclate and the ability of that recyclate to be reprocessed and utilised as raw material for new products. EfW plants, even with CHP are highly inefficient and although there is scope for them to produce local energy, the cost of retrofitting housing units at the local level makes that prospect highly unlikely.	The Plan proposes that the Council does not specify a preferred single technology for treatment of residual waste. Residual waste facilities include many options, not just energy from waste technologies, they include (but are not limited to) - Anaerobic Digestion (AD), Mechanical Biological Treatment (MBT). We do not consider that the co-mingled collection of recyclates facilitates the incineration of waste.
Mrs Lesley Cook 4 Bells Croft, Abernethy and	I have just read the Council's new Draft Waste Plan, and, in my opinion, it is riddled with half-truths and outright misinformation, clearly designed to create the false impression that the Council urgently needs the new incinerator proposed for Binn Farm. First, the Plan states at page 9:	Please find below responses to the main issues highlighted in response. <i>Utilisation of Energy from Waste facility operated by Dundee Energy Recycling Limited:</i>

Michael Gallagher
33 Precinct Street
Coupar Angus
Perthshire
PH13 9DG.

"The original proposal in the Plan was for this Council to utilise the energy from waste facility in Dundee (operated by Dundee Energy Recycling Limited) for residual waste treatment. *This has not been possible in practice, as there was insufficient operational capacity at the plant.*"

However as the following chart shows, the DERL incinerator has consistently run at well below its capacity of 120,000 tonnes per annum. The chart also shows that the Council has reduced waste going to DERL to less than 1%. Is this consistent with its claim to need new incineration facilities?

Amount of waste incinerated by Tayside waste authorities at DERL incinerator (figures from SEPA – click [here](#))

	2001-2	2002-3	2003-4	2004-5	2005-6	2006-7
Dundee	50692	42047	39191	40764	44250	53034
Angus	19330	19730	15563	15262	17404	9450
P&K	1052	1245	1499	1214	1461	987
Totals	71074	63022	56253	57240	63115	63471

Intriguingly, in June 2005 the Head of Environmental Services stated "Dundee City Council officers should be contacted regarding their plans to step down Dundee's use of the incinerator" (click [here](#) to see quote in context). No such contact was made, and subsequently Dundee's use of the DERL incinerator has risen rapidly. Nevertheless DERL is still working well below its full capacity.

Secondly, the Draft Waste Plan claims that there are concerns regarding the potential threat of fines against the Council for failing to reduce the amount of waste going to landfill (as required under the landfill allowance scheme). The plan states at page 14:

"If the landfill allowance scheme was re-introduced this Council would start to face penalties as early as 2012, dependent on waste growth. Without the Council having access to residual waste treatment, LAS penalties will increase to between £1 million to £3 million per annum by 2020, again dependent on waste

Since 2005, Council Officers have been in regular communication with Dundee City Council and Dundee Energy Recycling Limited regarding the feasibility of the Council utilising the facility. The facility does not currently have the operational capacity to deal with the Council's requirements for residual waste treatment. Although the facility was originally designed to accept 120,000 tonnes of waste per annum, in practice the capacity of the facility has been well below that figure due to operational issues.

Landfill Allowance Scheme Penalties:

The reason for changes in the projected amount of financial penalties facing the Council from the Landfill Allowance Scheme (LAS) is due to fluctuations in the amount of municipal waste arising. The Council is fully aware that only the biodegradable content of waste going to landfill counts towards LAS allowances.

Composting and anaerobic digestion facilities:

The Council put out to tender in 2009 a contract for the processing of mixed food and garden waste from Perth and Kinross Council in facilities compliant with the animal by- products (scotland) regulations 2003. The contractor that was awarded the contract (in January 2010) utilises an in-vessel composting facility to process the material.

Recycling and Composting of biodegradable wastes:

The Council are committed to introducing schemes and initiatives to collect and recycle/compost biodegradable wastes. However the Plan must recognise that a significant amount of biodegradable waste is still projected to be in the residual waste stream, and therefore require treatment.

Recycling of non-biodegradable wastes:

The Council already offers services and facilities for recycling many non-biodegradable wastes. The Council will seek to increase

growth."

Back in 2006 the Head of Development Standards claimed that without the new incinerator the Council would face fines of £5.7m per annum. This was the lie that prompted the Development Control Committee to award planning consent for the Binn Farm incinerator. However even the new figure of between £1 million and £3 million is completely false. The Landfill Allowance Scheme only applies to the biodegradable portion of municipal waste, i.e. the portion that can rot and produce methane if it is sent to landfill. Biodegradable waste consists mainly of paper, card, fabric, food and garden waste, nearly all of which can be recycled or composted at a fraction of the cost of incineration. This begs the question, why has the Council not implemented the plan it announced in 2008 to seek new composting and anaerobic digestion facilities (Bruce Reekie, the Council's Waste Plan Coordinator, told me that the Council would put contracts out to tender in August last year)?

As for non-biodegradable waste, more and more of this is becoming recyclable such as batteries and Tetrapak drinks cartons. Much more could be recycled if there was the political will, such as yoghurt cartons, plastic bags and fruit punnets (plastic bags and film alone make up 12.77% of waste in Perth and Kinross). However if there is a big shiny new incinerator at Binn Farm, that is where they will go instead. According to Friends of the Earth recycling plastics saves five times as much energy as can be retrieved from incineration. Therefore burning this material will be a grotesque waste of resources.

In fact, recycling rates are rising exponentially across the UK, with two councils in England (South Oxfordshire and Rochford) already breaking the 70% barrier. It is possible that within a few years these Councils will achieve nearly 100% recycling, leaving nothing to be burnt at all.

Incidentally as this table shows, plastics account for almost a fifth of waste in Perth and Kinross. Even with the new three-bin recycling system the Council will only be recycling a tiny fraction of this.

Material	Percentage of total for	Weight
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the range of materials accepted for recycling at the kerbside and at Recycling Centres and Points in the future. This will be reliant on the availability of end-markets and contractors willing to accept a wider range of materials for recycling.

The Plan follows the principle of the waste management hierarchy and does not propose entering into any contract for treatment of residual waste that will prevent the Council from implementing proposed actions for increasing the amount of waste recycled and composted.

It should be noted that the figures quoted by the respondent relating to plastics waste arisings have been calculated wrongly and should not be considered as accurate.

Comments relating to incineration of waste

The Plan does not propose that the Council incinerates its residual waste. The Plan proposes that the Council does not specify a preferred single technology for treatment of residual waste. The Plan proposes that any future procurement exercise considers a range of technology options. A due diligence assessment would be carried out on proposed treatment options as part of the procurement process.

It should be noted that the Zero Waste Plan for Scotland proposes to introduce restrictions on inputs into energy from waste plants. The Scottish Government are proposing to carry out a consultation exercise regarding this issue during 2011.

Landfill tax

Landfill tax for 2010/11 is £48 per tonne and the Government have announced that landfill tax will continue to increase by £8 until 2014/15. Funds received via the Landfill Tax are not directly given back to Councils for implementing recycling schemes.

	2007/8 (105,900 tonnes)	(tonnes)
Film/Carrier bags (type 4)	12.77%	13536
PET (Type 1) plastic	1.50%	1590
PP (Type 5) plastic	2.11%	2237
Plastics – Other (Type 7)	1.67%	1770
PVC (Type 3)	0.85%	901
PS (Type 6)	0.39%	413
Totals	19.29%	20447

Landfill is not the enemy

The Plan acknowledges that the Government will not allow the Council to burn 60,000 tonnes of waste per annum as it claimed it needed to in 2006 and that it will have to restrict the amount it burns to 26,478 tonnes each year. Dundee City Council will also have to reduce the amount of waste it burns, thereby freeing up further capacity at the DERL incinerator.

However the Plan offers no explanation as to why the Council needs to burn its residual waste at all. For a start it will contain almost no biodegradable waste, except for a few old shoes and bits of furniture, and it will therefore be quite safe to landfill. Furthermore the cost of incineration has risen sharply in recent years, to as much as £141 per tonne for the type of relatively small facility proposed for Binn Farm – see [WRAP Gate Fees Report 2009](#).

The Plan does its best to scare its target audience (Councillors) with the threat of annual increases in landfill tax. However this is completely bogus. No-one seriously believes that the Government would mindlessly penalise local authorities that were clearly doing their best to reduce the amount of waste going to landfill. Also, don't forget that the landfill tax remains in the public purse, and can be disbursed back to Councils for the purpose of increasing recycling. By contrast the money we will pay for incineration will go to the French multinational Suez.

Last but not least, the Plan states that the Council will tie itself to a minimum 20-year

Contract Length

Discussion and feedback from the waste management industry has indicated that a long-term contract is required to justify the initial investment in the necessary infrastructure. The final Plan however does not specify the length of contract the Council will seek. This will be based on further assessment of options available to the Council.

The financial implications to the Council would be assessed as part of the procurement process.

	<p>contract with a single firm – <i>almost certainly SITA</i> – to deal with (i.e. burn) its residual waste. This is insanity. If the council commits itself to provide 26,000 tonnes of rubbish each year for an incinerator at up to £141 per tonne, it will be crucified financially, and will gravely undermine recycling. Dumfries and Galloway Council has followed this disastrous route and has instructed householders not to bother separating their waste. Instead it all now goes to a sorting facility where all plastic and paper is turned into fuel stock for its new waste burner.</p> <p>I encourage you to do all in your power to stop Perth and Kinross Council from travelling down the disastrous route of incineration, and press for the Council's total disavowal of all forms of waste burning.</p>	
Q9. Are there any additional actions relating to the future treatment and disposal of residual waste that should be included in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No, all bases have been covered	
Charlie Devine WRAP, Scotland	We feel that the Council are demonstrating good environmental responsibility by excluding those technologies that are inefficient and / or detrimental to the environment and welcome this approach	
Lorraine McCauley CRNS	<p>The CRNS would urge Perth and Kinross Council to consider carefully the permitting of plants that seek to operate over a 20 - 25 year period. Over the last 5 -7 years more environmentally friendly and resource efficient reuse and recycling methodologies have emerged quite quickly to resolve increasingly difficult to handle waste streams. The CRNS would expect to see this continue and accelerate, as pressure on depleting oil and phosphorus resources increase.</p> <p>Longer term contracts and commitments to EfW plants could see Scotland lose out to the economic and environmental opportunities that innovative developments can bring and also prevent the realisation of a Zero Waste Society and reaching our Climate Change ambitions.</p>	The final Plan does not specify the length of contract the Council will seek for residual waste treatment. This will be based on further assessment of options available to the Council.
John Cockram Green Cone Ltd	See answers to Questions 4 and 5.	
Doug Boyle	A detailed characterisation of the residual waste is essential to permit informed decisions	

Scottish Organics Services	on technology mix for treatment, and on achievement or shortfall on targets. An assessment of the remaining available 80% of the arisings is essential for the ultimate Plan to be meaningful in any "strategic" sense.	
Q10. Do you have any comments regarding the future procurement route for residual waste treatment?		
Eleanor Strain Environmental Partnership Co-ordinator, SEPA	<p>As long as the Council has a definite idea of desired outcomes for the package of residual waste treatments, specified through the procurement process, it is up to the market to deliver.</p> <p>Understand that certainty cannot be given as to specific type of facility that will be required ("conclusions" page 37/38). However, information on what capacity of facilities would be required would be beneficial, as this will help decision making on planning applications and development plans.</p> <p>If no preference can be given for specific type of facility, there is still merit in stating what requirements there would be for type of facility:</p> <ul style="list-style-type: none"> • if an Energy from Waste facility is to be brought forward, then council can state what criteria must be met: eg facility to be capable of providing both heat and power to maximise efficiency, facility must be located close to consumers of heat and power, facility should be located close to providers of waste, facility should ensure that only residual waste is treated by means of including materials recycling facility on site. • If Anaerobic Digestion facility is to be brought forward, then council could state that site needs to be close to providers of waste, includes material recycling facility, includes collocation of linked processes such as composting. • (this requires some discussion/expansion with waste officers to ascertain appropriate co-locating processes) <p>This information could help plan what facilities are required, make sure that all Zero Waste Plan objectives (not just % targets) are reached and also enable land-use planning system to provide the facilities required.</p>	<p>The Plan provides information on the projected amount of residual waste that will require treatment.</p> <p>SEPA's Tayside Strategic Waste Management Review (SWMR) provides reliable data on total waste arisings (municipal and non-municipal) and existing waste infrastructure in Tayside. The Council will support the updating of the SWMR. Further information on SWMRs is available at http://www.sepa.org.uk/waste/waste_data/waste_data_reports/waste_management_reviews.aspx</p> <p>With regards to requirements for each technology, the Council would look to undertake full 'due diligence' assessments on all submitted proposals as part of any procurement process.</p>
Charlie Devine WRAP, Scotland	We have no comments in relation to procurement routes.	
John Cockram Green Cone Ltd	See answers to Questions 4 and 5.	
Doug Boyle Scottish Organics Services	This should have been evaluated prior to the consultation and the findings included for comment. Given the current imprecise knowledge of both the materials to be treated and the technologies options a Competitive Dialogue is probably the best option.	

Q11. Do you agree with the actions identified in the Plan relating to street sweeping and litter?		
Mr Colin McLeod 111 Balhousie Street,, Perth	Yes	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes	
Charlie Devine WRAP, Scotland	We agree with the actions identified	
Melanie Nicoll Dunkeld, Perthshire	I strongly support increased efforts to discourage littering and feel that far more resources/a major educational campaign is required. This should be linked to the waste reduction message. More work should be done in tandem with Eco Schools in these areas.	The Council acknowledges the points raised.
Doug Boyle Scottish Organics Services	Yes – more improvements suggested below and in covering letter.	
Q12. Are there any additional actions relating to street sweeping and litter that should be included in the Plan?		
Mr Colin McLeod 111 Balhousie Street,, Perth	Some areas of Perth (e.g. near Asda) are plagued by abandoned shopping trolleys, which are a nuisance to residents, an eyesore, a traffic hazard, and usually end up in the Tay or Perth Lade. It seems that the cost of lost trolleys to supermarkets must be less than the cost of rounding them up, because little effort is made to recover them, so additional financial incentives are needed. The council could set up a 'trolley-pound' where trolleys could be kept until collected by their owners, who would have to pay a fee for the release of each trolley. If this fee was set at a level below replacement cost (say 50%), there would be a financial incentive for the supermarkets to recover them from the pound rather than buying new ones, and the scheme would hopefully cover the Council's costs of collection & storage and would be more environmentally-friendly than sending abandoned trolleys to landfill. An alternative	A similar arrangement to the one suggested is currently in place with one of the Supermarkets in the Council area. Abandoned trolleys uplifted by the Council are collected and stored before being returned to the supermarket. Some supermarkets have voluntarily implemented their own security measures to reduce the number of trolleys taken off their site and the Council supports such initiatives.

	would be simply to fine retailers for each trolley that needs to be collected by the council. The real aim of the scheme would be to encourage supermarkets to introduce security measures to prevent the removal of their trolleys in the first place.	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No	
Charlie Devine WRAP, Scotland	We would suggest that any opportunities for recycling and recovery from litter and fly tipping are examined and that any opportunities for 'Recycling on the Go' are also examined as this has been identified as a potential source of quality recyclable materials within certain areas.	The Council has trialled the introduction of segregated litter bins for collection of recyclates. The result from the trial will be used in order to assess its viability before implementing throughout the Council area.
Doug Boyle Scottish Organics Services	Some 44% of the material is biodegradable – this should be recovered for AD treatment with other organic fractions. Upfront pre-treatment can remove the inert fraction.	
Q13. Do you agree with the actions identified in the Plan relating to the communication of waste awareness campaigns?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes	
Charlie Devine WRAP, Scotland	We agree with the actions identified and feel that the Council has demonstrated good practice and innovation with the communication process to date.	
Melanie Nicoll Dunkeld, Perthshire	I strongly support the intention to work closely with Education colleagues to integrate fully waste education into the curriculum and to explore creative ways of communicating this message. There may be scope to explore more specific/targeted messages about waste minimisation - for example, RCVs operating in a particular geographical area could carry messages about waste recycling etc rates in that area/incentives etc. I am also interested in seeing communities incentivised to tackle their waste and possibly the Council could look into	The Council acknowledges the points raised.

	this?	
John Cockram Green Cone Ltd	See our comments above regarding the establishment of new Master Composter Schemes in the Perth & Kinross Council area.	
Doug Boyle Scottish Organics Services	Yes but could be complemented.	
Q14. Are there any additional actions relating to the communication of waste awareness campaigns that should be included in the Plan?		
Mr Colin McLeod 111 Balhousie Street,, Perth	See answer 5 above	
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No	
Charlie Devine WRAP, Scotland	We would recommend continuing with the momentum of the current process of communicating with the communities of Perth and Kinross in the long term.	
John Cockram Green Cone Ltd	Se answer to Question 13	
Doug Boyle Scottish Organics Services	Work more with Take a Pride in Perthshire and local Bloom Committees. Liaise with Compost Doctors – Scotland on the business awareness and demonstrations aspects.	The Council acknowledges the points raised.
Q15. Do you agree with the actions identified in the Plan relating to household hazardous waste?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	yes, very progressive	
Charlie Devine WRAP, Scotland	We agree with the actions identified.	

Melanie Nicoll Dunkeld, Perthshire	& Q16 Sanitary and adult continence products waste must be addressed in the household hazardous waste guidance as there is scope for more reusable products to be used and it will be important to find an acceptable way to raise awareness of the option for using reusable products.	The Council will produce guidance document on healthcare waste management within the community setting. The Guidance is to be distributed to key stakeholders and made publicly available.
Doug Boyle Scottish Organics Services	Yes	
Q16. Are there any additional actions relating to household hazardous waste that should be included in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	No	
Charlie Devine WRAP, Scotland	We would encourage the investigation of expanding producer responsibility schemes where possible and expansion of the use of community groups particularly within the remote communities where commercial schemes may be deemed as not economically feasible.	The Council would support such an approach at the local level as appropriate.
Doug Boyle Scottish Organics Services	Yes. Battery collection at ALL PKC premises.	Household battery collections have been introduced at selected Council buildings and all Recycling Centres.
Q17. Do you agree with the actions identified in the Plan for non-municipal waste?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Support the recommendation for waste minimisation for non-municipal waste sectors. Recommend that the WMP makes reference to the benefits of Site Waste Management Plans. The net-regs website has guidance on drawing up SWMP, listing their benefits to business (economic savings as well as minimising waste) which could be usefully included in the WMP: www.netregs-swmp.co.uk Non-municipal waste - Local Development Plans are required to plan for all types of waste, not just MSW. I understand that the WMP is focused on the management of waste Perth & Kinross Council is responsible for, however if land-use planning is to be	The final Plan will include an action for the Council to sign up to Zero Waste Scotland's 'halving waste landfill' commitment, which relates to construction waste.

	used to site and locate required waste facilities then further information on waste facilities required to manage non-MSW should be given if possible. SWMRs can give more detailed info and these are to be updated over forthcoming months.	
Charlie Devine WRAP, Scotland	We agree with the actions identified.	
Lorraine McCauley	As (C&I) & (C&D) wastes are by far the biggest waste streams, the CRNS therefore agree with P & K actions.	
Melanie Nicoll Dunkeld, Perthshire	I would be keen to see further exploration of wood recycling/reuse initiatives, as well as projects that could redistribute DIY materials.	The Council acknowledges the points raised.
Doug Boyle Scottish Organics Services	Yes but not enough. It is ludicrous to propose STRATEGIC development for the area by reviewing only <20% of the waste arisings (Table 6) – that is NOT strategic. This is an issue for the Scottish Government and the whole Zero Waste Plan.	National Zero Waste Plan has more focus on all waste (not just municipal).
Q18. Are there any additional actions relating to non-municipal waste that should be included in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	As above	
Charlie Devine WRAP, Scotland	Pending the review on the definition of MSW and the revised delivery body structure we would support any opportunities to signpost organisations to the support network to maximise the opportunities to help manage these waste streams.	
Lorraine McCauley CRNS	During the Zero Waste Plan consultation, CRNS called on the Government to set targets for key waste streams in the commercial and industrial sector. To prepare for a changing landscape it would be advisable for PKC to focus on product streams that have a strong reuse market but that are currently going to landfill. These would include: <ul style="list-style-type: none"> • Office furniture • IT equipment • Contract furniture that can be reused in a domestic environment, for example, hotel and university halls of residence furniture and furniture used by housing providers The CRNS believes that the main barriers to higher reuse levels of commercial and	The Council acknowledges the points raised. Perth & Kinross Council will undertake internal waste management review to identify opportunities for further improving the way waste is managed within the Council, including furniture and IT equipment. The final Plan will include an action for the Council to sign up to Zero Waste Scotland's 'halving waste landfill' commitment, which

	<p>industrial waste are:</p> <ul style="list-style-type: none"> • Weakness of markets due to lack of green procurement • Lack of infrastructure due to current lack of markets • Lack of advice and support for the C&I sector <p>The CRNS would therefore ask that the public sector develop green procurement policies to incorporate reuse objectives. This would stimulate the market to a level where a reuse infrastructure could begin to flourish.</p> <p>The CRNS currently has members operating Building Materials Reuse Centres (BMRC's) that can take discarded items from the C&D industry and sell them to the public and SMEs.</p> <p>This is based on the well-established US model. However, this infrastructure will only continue to develop and grow if the C & D industry put reusable items to the BMRC's. Therefore the CRNS has called on the Scottish Government to make Site Waste Management Plans mandatory and to be part of the planning application process. The Site Waste Management Plans should reflect the waste hierarchy.</p> <p>Much work is being undertaken with the C&D industry to prevent waste and increase recycling. The CRNS called on the government to set preparing for reuse targets for the construction and demolition industry to ensure we are reflecting the waste hierarchy and that reuse is not squeezed out by recycling.</p> <p>The CRNS believes that there are very low levels of awareness about reuse in the C&I & C&D sectors and that now that an infrastructure is being established, an advisory campaign about the reuse of C&I & C&D waste would have a high impact.</p>	relates to construction waste.
Doug Boyle Scottish Organics Services	Yes. Accelerated data collation regarding in particular the C & I waste is essential to developing a coherent strategic plan. SEPA have started this but more localised effort is required. For example NHS, schools, prisons, L offices, Government offices, Care Homes etc. could, and should, all be readily audited.	
Q19. Do you agree with the actions identified in the Plan relating to the role of the community sector?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Yes	

Charlie Devine WRAP, Scotland	We agree with the actions identified.	
Lorraine McCauley CRNS	<p>The CRNS strives to provide local sustainable resource managements solutions in communities across Scotland and welcomes PKC's support of the community sector through its community waste fund and promoting the sector's ability to offer local solutions.</p> <p>However, CRNS would urge PKC to think more widely about the role that the community sector could play in achieving sustainability in Perth and Kinross, sustainability that will embrace social and economic goals as much as environmental ones. Community sector organisations see waste as a community resource which when managed locally can lead to a positive impact on communities and the environment. In order to achieve those aims they need greater access to the waste stream and they need support to develop innovative solutions to get the most out of that resource. There are many ways of working with community sector organisations to grow in order to achieve Zero Waste in Perth and Kinross (for more information see answer to Q 20).</p>	<p>The Council in partnership with charities and reuse projects has established a network, which regularly meets to develop opportunities to promote the activities and benefits of the sector. Projects already completed include the production of a local Charity Shop Map that provides details of the charity shops and reuse projects in the local area.</p>
Melanie Nicoll Dunkeld, Perthshire	<p>& Q20 I would like to see the Council explore ways to link up individuals from communities who are interested in/have ideas about possible waste/reuse projects but who are struggling to get these off the ground as they are unable to form a committee of like-minded people. A forum for these people to meet could be useful.</p> <p>I strongly support the Council's intention to promote the Community Waste Fund to local community groups and to promote and support community sector based waste projects that promote sustainable resource management in P&K, eg Perth & Kinross Real Nappy Networks. PKRNN appears to provide a very successful model that could be replicated for other similar projects.</p>	<p>The Council in partnership with charities and reuse projects has established a network, which regularly meets to develop opportunities to promote the activities and benefits of the sector. Projects already completed include the production of a local Charity Shop Map that provides details of the charity shops and reuse projects in the local area.</p>
John Cockram Green Cone ltd	<p>We collaborate actively with WRAP Scotland, the Scottish Waste Awareness Group, CRNS and local Master Composter Programme schemes across Scotland. As part of our business goals, we view the community sector in Scotland as an equal partner with local Councils. Evidence shows that regular use of FWDs in the home impacts on the food buying habits of individuals and as such is a powerful practical and educational means of promoting the ethos of a Zero Waste society. We strongly believe this aspiration is strongly supported by many community sector bodies.</p>	
Doug Boyle Scottish Organics Services	Yes, but much more could be achieved.	

Q20. Are there any additional actions relating to the role of the community sector that should be included in the Plan?		
Eleanor Strain Environmental Partnership Co- ordinator, SEPA	Engage in non grant aid funding, e.g. SLA's fo the diversion of waste from landfill	The Council will consider the use of service level agreements with community group/social enterprises on an individual basis.
Charlie Devine WRAP, Scotland	We feel that the Council should also examine ways of supporting local community businesses to seek alternative funding methods in addition to the Community Waste Fund and this may involve closer working with the CRNS. There are also examples of Councils creating internal markets for the re-use of materials via home start packs that can be a source of income for community based re-use projects.	The Council acknowledges the points raised.
John Cockram Green Cone ltd	See answer to Question 19	
Doug Boyle Scottish Organics Services	In multiple-occupancy properties investigate possibilities of community/social enterprise participation. In remote areas look for community participation to relieve excessive transport and other linkages (Cittaslow objectives), job creation etc.	The Council acknowledges the points raised.
Lorraine McCauley CRNS	Accredited Reuse and Repair Network (ARRN): The revised Waste Framework Directive has called upon member states to created Accredited Reuse & Repair Networks. The CRNS will form that network in Scotland and would appreciate it if PKC included the support of the local network members in Perth in the Plan. The inclusion of ARRN's in the revised WFD is recognition by the EU that excessive consumption is at the route of the waste problem. PKC should work in partnership with the community sector to focus on making repair & reuse an economically viable and acceptable option. For example, CRNS members have highlighted that people sometimes dispose of bikes because they do not know how to repair a puncture. Reuse Shops on Recycling Centres: The CRNS would like to support PKC commitment to improving facilities at Recycling Centres to ensure that opportunities for reuse are maximised. To achieve this the CRNS would recommend that PKC invest in building Reuse Shop infrastructure on HWRC's in	The Council will investigate feasibility of collecting reusable materials at Recycling Centres for resale and redistribution in the local area.

partnership with the community sector.

Reuse shops take in reusable items that might otherwise have been disposed of at the site; sort, clean and test them and sell back to the public. The purpose of having reuse shops on HWRCs is simple: they divert reusable items from landfill and move waste management on the sites up the hierarchy.

The concept is well established in some countries such as New Zealand and Australia. In 2003, Warwickshire County Council was the first UK Local Authority to establish one. Since then, the Council has opened a further two outlets and similar shops have been established in Brighton and Hove, Moray and Oban. A number of other Scottish Local Authorities are also considering setting up shops on their sites.

The aim of the reuse shop model is to divert as many reusable items as possible that come onto HWRCs, through providing a simple drop-off service and by retailing them back to the public.

The Reuse Framework, Annex G of the Zero Waste Plan consultation, states:

“Local Authorities will be supported by the CRNS to develop reuse shops in recycling centres through the provision of guidance, training and the establishment of exemplars.” Although CRNS commends PKC on their Recycling Centre Redevelopments, it would like to state that in order to maximise reuse and recycling at HWRC’s the best option is adding a Reuse Shop. To this end CRNS would like to see the trial of a Reuse Container at Friarton Recycling Centre eventually becoming a Reuse Shop run by community sector partners and for the new Recycling Centre to service North Perth to have a Reuse Shop built into the plans from the outset. Partner with community sector organisations to open BMRC’s (Building Material RecyclingCentres)

The CRNS is currently working with members to establish Building Materials Reuse Centres (BMRC’s) that can take discarded items from the C&D industry and sell them to the public and SMEs.

The CRNS is currently working with its members to grow the infrastructure for building materials reuse and would be open to partnering opportunities with Local Authorities. However, this infrastructure will only continue to develop and grow if the C & D industry put reusable items in the BMRC’s.

Support the development of Community Composting

A barrier to the community composting is related to planning regulations. The CRNS would like to see simplified procedures, which are proportional to the scale and risk of the operations, along with more joint working between local authority departments and

	<p>SEPA when new sites are being planned. Community Composting should be prioritised in terms of planning requirements in line with the goal of the National Planning Framework for Scotland to supports sustainable economic growth. The CRNS proposes that PKC should consider local community composting options.</p> <p>Access to Bulky Uplifts</p> <p>The action that seeks to recover value from bulky and special uplifts is of interest to the CRNS as one of its members undertook a bulky uplift pilot that demonstrated a 67% landfill diversion rate. The CRNS members are anxious to access the bulky and special uplifts waste stream and the CRNS are happy to work with Perth and Kinross to make that happen.</p>	
Q21. Do you have any other comments regarding the Draft Perth and Kinross Waste Management Plan?		
Eleanor Strain Environmental Partnership Co-ordinator, SEPA	Comprehensive and ambitious plan - would like to see more local authorities taking such initiative. Good luck with implementation.	
Charlie Devine WRAP, Scotland	We feel that the document represents an excellent opportunity for the residents, communities and businesses served by the Council to have a say in the future of the recycling and management of waste resources on their behalf by the Council and the consultation process carried out by Perth & Kinross Council should be recognised as a model for future consultations by other local authorities.	
Abernethy and District Community Council	<p>Page 58 - Appendix 2, 1st paragraph</p> <p><i>The new Development Plan system will set out the planning policies, priorities and land allocations for the authority. Local authority waste managers have been involved in the preparation of the new development plan to ensure future requirements for new facilities to deal with municipal waste in relation to the Authority's own waste strategy has been taken into account.</i></p> <p>Clarification on the above is required as we do not follow how given the range of possible waste operations proposed in the draft, as yet not decided upon, that future requirements for new facilities can already be identified. Could it be that decisions are already made and this consultation is only a matter of process?</p>	<p>The final Plan will include an action to set criteria for the development of waste treatment and management facilities through the Local Development Plan.</p> <p>The final Plan will also detail that further assessment is to be undertaken regarding the options for joint procurement with other local authorities and the length of contract that will be sought.</p> <p>The Plan includes several actions to increase the Council's recycling and composting rate and reduce the amount of residual waste needing managed. However the Council requires to realistically forecast the amount of residual waste that will still require treated and ensure necessary plans are in place to deal</p>

Page 58 - Appendix 2, 2nd Paragraph

Modern waste infrastructure is designed and regulated to high standards and is similar to other industrial processes. Appropriately located, well-run and well-regulated waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Locations which are appropriate for modern industrial development will therefore also be considered appropriate for many waste management installations.

Abernethy is very aware of waste infrastructure and inappropriate siting of these industrial processes, being the down wind neighbours to the present operations at Binn (Landfill, Gas generators and Composting). Appropriately located, well-run and well-regulated does not appear to come into the equation of the Binn operations.

For years the Council has avoided responsibility of their decisions to allow these operations to go ahead at Binn, maintaining the regulatory body is responsible for the proper operation of these sites. However the Council as a contracted user of these operations also has responsibilities.

The fact SEPA are continually requesting actions be carried out by the operators at Binn in an attempt to alleviate the problems created by these operations demonstrates the fact that all is not well run at Binn.

SEPA records, local smell diaries, all confirm and demonstrate the unsatisfactory running of these processes and the consequences, with the operators being reactive rather than pro active.

Hundreds of letters were sent to the Council in relation to the proposed EfW plant at Binn. Each letter informed of the already unsatisfactorily run operations at Binn conveying the local problems resulting. Christmas day 2009 was spoilt for many due to landfill gas and this continues on frequent occasions to date. At present we are awaiting reports from SEPA relating to 2 serious incidents/problems – (1) the landfill is leaking. (2) Unaccounted for tipping at the landfill.

To invite/ concentrate further waste operations at Binn may be financially beneficial to

with this waste.

The Council would look to undertake full 'due diligence' assessments on all submitted proposals as part of any procurement process.

Discussion and feedback from the waste management industry has indicated that a long-term contract is required to justify the initial investment in the necessary infrastructure. The final Plan however does not specify the length of contract the Council will seek. This will be based on further assessment of options available to the Council.

The financial implications to the Council would be assessed as part of the procurement process.

the operators/ landowner, however it would be contrary to Council policy on improving the Environment and Quality of life of the local area, signifying an unacceptable level of discrimination against the local community who insist upon an equal standing with the rest of Perth & Kinross residents. Particularly as there are available brown sites nearer to the main source of waste for such developments.

Page 36 Future Requirements for Residual Waste Treatment and Disposal – paragraph 2

Based on waste arisings forecasts, it is evident that the Council will only be able to meet long term targets for landfill diversion and recycling and composting, if necessary infrastructure is secured, for diverting waste from landfill, by treating residual waste. However any new contract for residual waste treatment will need to be part of the Council's integrated strategy for waste management which prioritises waste prevention and recycling and composting and will need to allow for flexibility to respond to changing circumstances e.g. changes in legislation, or changes in waste composition and arisings.

We have been informed that there are Councils (England) who have achieved recycling rates of 70% and rising. The Scottish Government must also feel this is achievable to have set the waste targets as it has.

If this is possible for some to achieve it is felt P&K Council should be more pro-active in addressing the waste issues endeavouring to extract further materials for recycling /composting. A recent news story reports on a family who have one residual waste bin per year and while this is a very ambitious concept for P&K Council at present it is a target that some could achieve and should be aimed for. I.e. P&K Council endeavouring to gain further contracts to supply recycled materials – Education / information on product packaging preference for consumers could be very beneficial - Discussions with the numerous supermarkets in Perth City on preferred packaging. - Businesses/ restaurants /food premises / private boarding Schools should be advised/ encouraged to segregating their waste now, not left to add to the residual waste figures.

Notwithstanding the above we are informed that more than one process will be required to process the residual waste from P&K Council.

At present very little waste (less than 1%) from P&K Council goes for incineration at Dundee who are part of the Tayside Area Waste Plan. This reduction over recent years

	<p>clearly demonstrates that P&K Council do not require an additional plant to treat their residual waste. Private Commercial needs for such an operation should not be a consideration for this authority even if they consider they may ride on the back of such a businesses venture.</p> <p>However, the fact that as time progresses with the new waste legislation more available space should arise at Dundee incinerator therefore consideration must be given to the use of this plant to treat P&K Council residual waste.</p> <p>Long-term contracts with waste operators such as 20 years make little to no allowance for the changes to any residual waste arising in Perth & Kinross. Shorter and more flexible contract would be a more practical option.</p>	
John Cockram Green Cone Ltd	<p>The following overview of Green Cone Ltd's role in municipal waste prevention should be read in conjunction with our responses to previous questions.</p> <p>Green Cone Ltd is the UK market leader and distributor for domestic food waste digesters (FWDs) and associated products which allow ordinary householders with gardens to dispose of all types of food waste in the home. The overarching business aim of the company is to promote home treatment of biodegradable municipal waste (BMW). We actively work with Scottish local authorities and the community sector in developing new opportunities for householders to use FWDs, as independent research clearly indicates this can achieve significant financial and environmental savings over centralised collection and treatment methods such as dedicated kerbside collections and anaerobic digestion (AD) plants. For further information on our product range and services, go to www.greencone.com</p> <p>Our best known products, for which we hold the global patents and distribution rights, are the Green Cone and Green Johanna food waste digesters. By definition, FWDs work differently from conventional compost bins; they are technically more sophisticated and therefore cost more to manufacture and buy, but they are designed to break down <u>all</u> forms of food waste, including meat and fish residues and cooked food that cannot go into an ordinary compost bin. Despite this crucial difference, FWDs are frequently perceived in the UK waste industry and by WRAP as part of the 'home composting' component of waste management.</p> <p>We have been selling FWDs in bulk to Scottish local authorities for the past 10 years, and Perth & Kinross Council has trialled a number of Green Johannas on Council premises, with notable success at Stanley Primary School, since 2007. Several Councils</p>	

	<p>elsewhere in Scotland have made a significant investment in Green Cones, especially those covering predominantly rural areas where kerbside collection is either very costly or impractical. Trials of the Green Johanna, whose 'hot composter' design is particularly well suited to the Scottish climate, are currently in progress under the auspices of the Cairngorms Waste Recycling Forum and the CRNS Compost Doctors Programme.</p>	
<p>Doug Boyle Scottish Organics Services</p>	<p>A fundamental flaw is that the Plan only seeks to address <20% of the areas waste arisings; thus it cannot be truly considered "strategic".</p> <p>I believe that the WMP would have benefited from being much more complete – it has identified many areas of lack of knowledge or of aspiration that would have been better addressed prior to the draft and then included in the consultation. These have been mentioned in the relevant sections above.</p> <p>I believe that the technologies review was unable to make any meaningful conclusions or recommendations due to the dearth of information on the qualities of materials requiring to be treated.</p> <p>I consider the SEPA 25% to EfW based on the '07/08 arisings to be an unrealistic restriction for the future – particularly if the PKC growth rate approaches 4%/a.</p> <p>Given the comments above I consider the Plan somewhat premature and lacking in detail – the proposed finalisation by Masch 2010 will, I believe, permit the Plan to be developed to its full, and require, potential.</p>	<p>The focus of the Plan is on municipal waste management as this reflects priorities and targets set for the Council by the Scottish Government. However the Plan also considers the management of non-municipal wastes in Perth and Kinross, to reflect the broader targets set by the Scottish Zero Waste Plan.</p> <p>The release of the Plan has been delayed to fully take into account the new Zero Waste Plan for Scotland.</p>