



Beyond Recycling: A strategy to make the circular economy in Wales a reality

Consultation response form (Number: WG39588)

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Action required: Responses by 3 April 2020

How to respond There are a number of questions within this consultation document. You can submit responses to these and add your own comments by post or by email to our dedicated consultation mailbox – or you can respond via our online questionnaire.

Further information and related documents Large print, Braille and alternative language versions of this document are available on request.

<https://gov.wales/circular-economy-strategy>

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg /
This document is also available in Welsh

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Cathays Park
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Wycliffe House
Water Lane
Wilmslow
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SK9 5AF

Tel: 01625 545 745 or
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Website: <https://ico.org.uk/>



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April 1st 2020

Dear Sir/Madam,

Please see the Farmers Union of Wales (FUW) response to the Beyond Recycling: A strategy to make the circular economy in Wales a reality consultation after consulting with its membership through the twelve county branches.

Due to the extreme disruption of working practices and members' businesses at the hands of the Corvid 19 pandemic, the FUW was not, as normal, able to canvas face to face opinions from its branches, therefore please accept the below comments as restricted and a work in progress. The FUW would like the option of reconsidering the consultation issues and actions and to inform the Welsh Government of any further considerations at a later date.

General comments

1. The FUW's membership were supportive of the aims and objectives of the consultation and its policy intent to recycle wastes in a sustainable manner. Indeed, members commented that the agriculture sector was in fact a good exemplar of a sector that currently recycles waste. Farmers routinely take animal wastes, such as slurry or manure and recycle the nutrients as a valuable fertilizer to the land, guided by a nutrient management plan. Another example would be on farm anaerobic digester (AD) plants which convert waste into heat or energy for other diversified investments such as farm tourism.
2. There are potential opportunities and advantages from processing public waste at local farms as opposed to collection and transfer to more distant reprocessing sites with the associated additional economic and environmental costs. Appropriate support measures would be required for the sector through support channels such as the Rural Development Plan or its successor.
3. Members felt that overall the consultation was more aspirational than inspirational, as there was very little supporting evidence or data provided for readers of how the actions proposed would be delivered and how the income achieved would outweigh the costs.

Below are the responses to the consultation's questions for your attention. Should you have any further queries, please do not hesitate to contact me.

Yours sincerely
Bernard Griffiths (Policy Officer)

Building on our recycling record

Question 1: Are the suggested actions the best way to help us recycle more?

The headline actions listed in the consultation appear to be statements of intent or desired outcomes. For example, headline action 1, “Become the world leader in recycling”, is an aspiration or target.

The FUW are pleased to see headline action 4, “Make more efficient use of our food” as it recognises the importance of the whole supply chain, so recycled materials from one section of the chain could be recycled for use in another.

The other actions appear to be practical and logical, but will require significant investment in infrastructure and resources and as stated in the general comments above, the costs to achieve the actions and whether there will be a net economic benefit after doing so are not discussed in the consultation. Members noted that on most occasions, added regulations require policing and therefore carry an added cost.

The FUW would appreciate more detailed information on the actions themselves. The members supported encouraging businesses to innovate; research and development and analysis of other countries' approaches would be beneficial.

Members noted that if beaches were cleaned of waste washed up with the tide and recycled then two benefits would be realised at the same time.

Farmers recycle or treat waste such as rocks, concrete, bricks and tiles, and aggregates for construction activities, tyres and many more, but at present the quantities are restricted by set limits of time periods and weight. If Wales is to advance recycling within all sectors then businesses must be allowed greater freedom to utilise materials as and when they become available and without adhering to complex licensing, monitoring and upper limits.

Question 2: Should recycling arrangements across Wales be consistent?

Members felt that recycling arrangements should be consistent throughout Wales, strategically positioned to reduce transport costs and be in a position to cope with waste within designated areas in line with population and population trends. There should be best practice procedures and a consistent approach.

Some FUW members commented that if recycling arrangements were inconsistent, then it would be difficult, if not impossible to set local authority targets. Other members thought that the recycling targets for non-domestic waste were ambitious but believed that with assistance from the manufacturing sector and an increase in the recycling infrastructure in Wales for businesses that the targets could be achieved.

It was noted that only 13 out of the existing 22 local authorities now follow the same approach. On targets, responders thought that setting a 100% recycling rate was not realistic and that a 70% target by 2025 would require adjustment to consider the distortions from Brexit and Covid 19.

Members felt that there should, where possible be cross border consistency of recycling regulations and market values as this would help standardize waste recycling and treatment across all areas.

Until the vehicles running on fossil fuels collecting recycled waste are replaced with more environmentally friendly electric rechargeable vehicles, then recycling materials as close to source would be a good idea.

Question 3: Are the suggested actions in this theme (Building on our recycling record) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

In order to maximise the quantity of recycled materials, members suggested that recycling centres would need to extend opening hours, both for the public and for the business sector, as many business people would be unable to visit recycle centres during core business hours.

Some suggested that different charging systems for different materials and at different times would be necessary in order to control the supply and demand market .

As highlighted in the consultation document, responders agreed with increasing measures to reduce single use plastic and switching to the use of biodegradable cups or mugs for general public use at sport venues, concerts and shows.

Other members highlighted the importance of finding recycled uses for the following waste products from the agriculture sector, black plastic, 5 and 45 gallon plastic drums, the net off big bales and plastic feed bags.

In order for negative effects to be mitigated, the new strategy must work for and with farmers and not introduce new measures overnight for the disposal of farm waste, without adequate support or alternative markets.

Some members thought that milk bottle tops were a waste issue. They suggested that the use of recycled glass bottles for milk and other liquids was worth considering, as well as other incentives to get members of the public to return bottles to source for refilling. Some companies claim that 80% less plastic is required when products such as kitchen cleansing liquids are sold as multipacks.

Farmers have long highlighted supermarkets' foolish marketing of vegetables, such as parsnips or carrots having to match a specified length and shape. Even though the rejected vegetables can be fed to farm animals this is an unnecessary waste that could be avoided by selling misshapen vegetables at a reduced rate.

Supporting prevention and re-use

Question 4: What actions could we take to further promote the work on prevention and re-use that occur in our communities?

The consultation document mentions a 2015-16 analysis of recycled waste and that only 10,000 tonnes out of 180,000 tonnes of Local Authority collected municipal waste was prepared for re-use. This analysis should provide the information of which waste requires priority attention.

The FUW supports a Farm to Fork partnership approach as recycled waste can be moved up or down the chain depending on the circumstances, to produce other materials or for on farm uses.

The FUW supports the actions listed in the consultation document to share knowledge with the wider population on this topic. The Farming Connect program engages with the agriculture sector and it could share best practice on recycling and waste treatment, through its range of events, knowledge transfer and demonstration farms. Once the priority waste material is identified and the know-how shared across the sector, then financial support will be required to help businesses adapt to recycle the waste which currently remains untreated.

In the agriculture sector, the best channel for delivering this change and focus are the grants offered by the Rural Development Program (RDP), or any equivalent post Brexit support scheme.

Question 5: Do you agree we should develop and expand the work we do in schools on waste prevention and re-use?

The Farmers' Union of Wales Education and Training committee have continually engaged with the education sector in Wales from early school years through to higher education. The Committee invited Ms Kirsty Williams AM, Minister for Education to a secondary school in the Aberystwyth region to witness one of the few schools that offer agriculture on the curriculum in Wales.

If this approach was widely adopted by all schools across Wales, then the treatment and recycling of waste could be included in the syllabus, demonstrating how the whole supply chain can contribute to tackling the problem in the agriculture sector, and how the sector can interact with other sectors.

Question 6: What do you think are the key steps that we need to take to further reduce avoidable food waste?

Please see reference to the marketing of vegetables in question 3 above.

Members felt that consumers should give careful consideration to "best before dates" as this results in throwing away tonnes of food as waste. Others thought that supermarkets' loss leaders artificially reduced the price of food and this could instill a throw away attitude to food amongst consumers.

Most members supported more home economics education for school aged children and cooking programmes for the general public.

Others suggested that more people should support local procurement of fresh produce as this also resulted in less bulk buying and food produce sold locally tended to have less packaging. An example of this might be vegetable produce sold in boxes or from farm shops .

Question 7: Are the suggested actions in this theme (Supporting prevention and re-use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Members broadly supported the actions listed . Please see response to question 5 for further information.

Some members mentioned that the volume of plastics used in packaging goods was excessive and on occasions paper could be used as an alternative. Members also suggested the reuse of both metal and plastic drums.

Members commented that if the policy was to use a fleet of electric vehicles to collect and deliver waste to recycle centres, then the UK government should consider a vehicle replacement scheme for all diesel vehicles in order to decarbonise the supply chain.

Driving innovation and materials use

Question 8: Are the materials we have listed ones we should focus attention on?

The consultation makes several references to purchasing timber for public sector uses. Whilst this is an option, members wondered if the UK produced enough home grown timber to make this a viable option. Natural Resources Wales manages the Welsh Government's woodland estate but places less emphasis on commercial timber production than its predecessor, the Forestry Commission of Wales. If the UK had to resort to importing timber then the carbon footprint associated with transporting timber from abroad would have to be considered.

Some members stressed the importance of maintaining an open and free trade with the EU as the EU was considerably closer than other potential trade partners such as China, USA or Australia.

Some FUW members would like to see more research into the use of flax and hemp for wrapping.

Question 9: Are design changes in products using the materials listed an area to focus on?

There was broad agreement that we should move away from the use of plastics and where possible switch to bioplastics. However, as stated under the general comments earlier, it is very difficult to consider design changes and options listed in this consultation, unless they are

accompanied by an economical impact assessment.No such details are offered in this consultation, therefore the FUW would like to see that information when it is available.

Question 10: Are the suggested actions in this theme (Driving innovation and materials use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy? Are there other materials we could focus on and why?

Please refer to the responses to questions 8 and 9 above.

Using Government levers

Question 11: Is our focus on improving resource efficient procurement within the Public Service a priority area?

The FUW fully supports resource efficient procurement within a Public Service priority area as this will support farm to fork supply lines and support a circular economy. The measures already adopted, such as using recycled paint and paper are accepted as common sense policies.

The FUW supports using government levers so that local schools and hospitals procure supplies from local businesses at a sensible sustainable price.

Question 12: Is our focus on materials used and resource efficiency in construction a primary consideration to implement for the future?

The FUW responses agreed that it was a primary consideration for the future.

Question 13: Are the suggested actions in this theme (Using Government levers) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Members agreed in principle with the list of actions but caveated some with the comments below.

The FUW would like to have more information on the Welsh Government's intention to introduce an Extended Producer Responsibility for additional products such as tyres, textiles, bulky wastes (for example furniture, mattresses and carpets) and products used in construction as there is insufficient detail in the consultation on the costs involved.

Members agreed that Wales should not export waste to be a problem elsewhere in the world, but we should consider exports to other countries when the waste is sustainably recycled and processed and when other countries have superior infrastructure to treat the waste .

The FUW's members support a Deposit Return Scheme for drinks containers, and applying bans or restrictions to phase out the use of unnecessary, highly littered, single use plastic.

Some members suggested the introduction of financial rewards for reaching set targets as opposed to increased regulations and penalties for not reaching the target.

Others stressed the importance of supplying well prepared advice and guidance to all, both domestic homes and professional businesses.

The FUW strongly supports a Litter Prevention Plan for Wales and the continued delivery of a Fly-tipping Strategy for Wales, as private landowners, including farmers, are all too often left to shoulder the cost of waste clearance after fly tipping incidents on to private and common land.

If the overall waste recycling strategy and targets imposes extra burdens on domestic homes and business, then there is a likelihood that some unscrupulous individuals will take to disposing of unwanted materials to private ground.

Enabling communities and businesses

Question 14: Is our continued business support to make them more resource efficient a priority action?

Yes, members requested more focus on this, as it will increase efficiency and will help reduce our carbon footprint.

However, a switch from plastic containers to recyclable glass containers may not always be a better option. Wholesalers have observed that the benefits of using a reusable container, such as glass, are sometimes lost as the transportation of the extra weight results in more fuel consumption and extra emissions from diesel powered lorries.

Members supported the roll out of refill water points and wondered whether this approach, health and safety allowing, could be used by the public to procure other liquids.

There was broad agreement on the need to harness the passion and enthusiasm of young people through a schools programme and other initiatives to effect change. Please refer to our response to question 5 above.

Question 15: How would you view starting a Zero Waste Town area?

Whilst starting a Zero Waste Town area would be an exciting template to test new and existing actions for recycling and developing a circular economy, it would nevertheless be a huge project to initiate and fulfil. Public support and financial aid to initiate this would be essential. This should be publicly funded.

Members commented that a successful circular economy should not be viewed as made up of separate entities of urban and rural ventures, but more as a holistic system involving the whole supply chain, such as farm to fork.

Question 16: Are the suggested actions in this theme (Enabling communities and businesses) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

The suggested actions are a step in the right direction. There appears to be a trend that bigger supermarket chains are dominating towns and city centres; that is having an impact on the environment and culture of Wales. There needs to be a balance between multinationals and other businesses within the supply chain.

Investing in infrastructure

Question 17: Are the initiative actions mentioned here those we should aim to provide supporting infrastructure for?

The UK and Welsh governments should be leading on providing the infrastructure required as the cost was likely to be massive.

Question 18: How can we work regionally to ensure resource efficient decision making?

Through sharing best practice across regions.

Research and study should be available to promote and enhance the best practice.

Question 19: Are the suggested actions in this theme (Investing in infrastructure) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

No further suggestions were offered.

Other questions

Question 20: We would like to know your views on the effects that our proposals in this document would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Some members thought the best way to mitigate effects on the Welsh language was to employ bilingual people to deliver the education and guidance required to deliver the policies effectively. For the Welsh language to thrive it is necessary to give speakers the opportunity to use the language at work and not just in homes and schools.

All data sets indicate the importance of the agriculture sector to the viability and sustainability of the Welsh language within rural communities in Wales (44% of the Welsh agricultural industry speak Welsh), this is especially so in the west and north of Wales.

Question 21: Please also explain how you believe the proposed strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Please see Q20 above.

Question 22: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to address them.

None.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please let us know by ticking the appropriate box.

If responding by post or email, please include your name, organisation (if applicable), phone number and address along with your response. Thank you.

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