

Meeting:	Cabinet
Date:	15 th December 2005
Subject:	Joint Waste Strategy
Responsible Officer:	Executive Director (Urban Living)
Contact Officer:	Andrew Baker
Portfolio Holder:	Environment and Transport
Key Decision:	Yes
Status:	Part I (with Part II report attached for Members' information only)

Section 1: Summary

Decision Required

To consider the public responses, and to agree the council's formal response to the consultation draft of the strategy (set out in Para 2.2 recommendations).

Reason for report

The consultation draft of the joint waste strategy has been available for comment since mid-September, with a closing date of 30th November.

Benefits

The agreement of a joint waste strategy will allow WLWA and the six constituent authorities to make progress on procuring new waste disposal processes; meet their obligations under the Landfill Directive; reduce their reliance on landfill; and, reduce their financial liabilities under the Landfill Allowance Trading Scheme.

Cost of Proposals

Potential liabilities under LATS would be substantial if the joint waste strategy is not adopted and implemented. There are no immediate costs associated with the approval of the joint strategy. In the medium to long term the higher recycling targets will mean that the council would have to make further improvements to

the recycling schemes it offers. Additional collection costs should be offset by reduced disposal costs and avoidance of LATS liabilities. Decisions would need to be made on a case-by-case basis.

Risks

If the joint strategy is not agreed, WLWA and the six authorities will be in breach of the Waste and Emissions Trading Act 2003 (and the Mayor of London's municipal waste management strategy) and will incur additional costs from the Landfill Allowance Trading Scheme as they will not have a strategy on which to procure alternative facilities to landfill

Implications if recommendations rejected

The above risks would be more likely to occur

Section 2: Report

2.1 Brief History

WLWA and the six constituent authorities have been developing their joint waste strategy over the last eighteen months. This process has involved a significant element of public consultation with the establishment of a Waste Forum and a Community Forum (across the WLWA area) and local consultation carried out by the six boroughs. In Harrow this took the form of two focus groups for residents and one for members of the workforce.

The first draft of the strategy was published in June 2005 [?] and discussed at a joint meeting in August 2005. A revised draft was issued by WLWA in September for wider consultation.

2.2 Consultation

The following proposals for consultation were outlined in the report to Cabinet on the joint strategy, in July.

September 2005	Public consultation starts	Distribute summary and feedback form to planning database Feature and feedback form in October issue of Harrow magazine Discussion with HA21 Waste group
October 2005	Harrow People	Consultation article
15 th December 2005	Cabinet	Originally scheduled for October 2005 Cabinet. Results of public consultation and official Harrow response to

		consultation draft.
1 st February 2006	WLWA board	Report back on public consultation. Approval of any changes
February/March 2006	Cabinet	Approval of final version

The consultation draft of the joint strategy is written in language that is difficult to access for the layperson. The article for Harrow People was therefore re-written in conjunction with public relations and WLWA to ensure that the language used was as accessible as possible. It was also decided to seek people's general views rather than supply a more formal feedback form as it was considered that a feed back form would be too simplistic.

Having made the change - to seek people's views rather than have a feedback form - the proposed format for consultation has been followed with the exception that a copy of the Harrow People article was not distributed to organisations on the planning database. Officers considered that the change in the methodology meant that organisations would find it difficult to make comment. The one exception to this has been the HA21 waste group, who will be discussing the draft strategy on 30th November at an evening meeting.

Responses to the consultation have been limited with a total of four having been received. Responses in the other five WLWA boroughs also appear to have been low. The main points raised are as follows: -

- There is general support for Harrow's proposals for increasing recycling, which were approved by Cabinet in April 2005.
- The comments from HA21 waste forum wanted to see a target to recycle five materials (one of which should be kitchen waste) from all households by 2010. In Harrow, this would mean extending kitchen waste collections to flats by that date. There would be cost implications if this was adopted as a policy. At this stage the council should ask that the strategy incorporate an investigation into the possibility for the inclusion of kitchen waste (as one of five materials). The costs and benefits of this need to be established before a firm decision is made.
- There is a strong desire for the council (and WLWA) to do more to reduce the amount of waste being produced by the promotion of real nappies, home composting, junk mail initiatives etc. There was strong support from HA 21 for a WLWA-wide campaign to promote reusable nappies within the health service and baby-care professions. There are also useful comments on furniture reuse schemes and plastic bags.
- HA21 also made three additional comments to Harrow
 - Collect household batteries at the civic amenity site – This can be introduced within existing budgets and will be introduced in the new year
 - Publicise more widely the free service for the collection of hazardous waste from households. Again, this can and will be done

- The council should lead by example in the treatment of its own waste. – This is already in train. The office recycling scheme at the civic centre will be officially launched on Dec 19th.
- There were also clear objections to the use of incineration to deal with residual waste – on loss of resource and health grounds. These issues have been addressed in the development of the strategy and do not need any further comment, by Harrow, to WLWA. The agreed evaluation criteria for technologies to deal with residual waste incorporate these issues and will be used in any future evaluation of proposed technology. The WLWA Board will be the body responsible for awarding contracts for the treatment of residual waste.

Recommendation

Cabinet is recommended to approve the draft strategy and ask WLWA and the other collection authorities to consider:

1. Establishing a WLWA-wide campaign to promote reusable nappies within the health service and baby-care professions.
2. An investigation into the possibility (and costs) of the inclusion of kitchen waste (as one of five materials collected from every household by 2010).

All the responses received by Harrow are attached in Appendix A.

The response to WLWA from West London Friends of the Earth is attached, for information, as Appendix B. The points raised by FoE are not addressed in this report but will be considered by WLWA.

2.3 Implications for Harrow (of the joint strategy)

The draft strategy sets out a number of aims. Over the next eighteen months to two years these are broadly in line with the service developments on waste management, set out to Cabinet in April 2005. E.g.:

- Complete the roll-out of the Brown Bin scheme
- Introduce the recycling of plastic bottles
- Introduce a scheme for recycling from flats
- Increase participation in the Green Box scheme
- Change the collection frequency of the Brown Bin and the waste bin.

The draft joint strategy sets a medium term target of recycling/composting 40% of waste by 2010 and 50% by 2020. Achieving these higher levels will require further changes to the council's waste collection systems but, at this stage, it is too early to say precisely what these will be. The joint strategy will allow for future discussion within WLWA and the six authorities to monitor progress before making final decisions. The government is expected to consult in the near future on how to revise its statutory recycling targets. The higher levels proposed in the joint strategy are expected to be broadly consistent with any revised statutory targets.

The draft strategy identifies two “benchmark” technologies for treating residual waste (Energy from Waste incineration and Mechanical Biological Treatment) as

providing the best fit with the aims of the strategy. It is proposed that other technologies, such as emerging (thermal treatment) technologies would **not** be excluded from any future procurement by WLWA – to treat residual waste – but that Tenderers would need to demonstrate that their proposal is at least as good a fit as the “benchmark “ technologies. This approach is sensible as it will help to inform Tenderers of the selection criteria but will not exclude any technology.

However there is a major risk that the Mayor of London will not approve this approach as it runs counter to his own municipal waste management strategy, which expresses a preference for emerging technologies over mass incineration. If the Mayor were to withhold approval, implementation of the strategy might be delayed and WLWA would be exposed to future LATS liabilities. It is not clear what options would be available if the Mayor were to withhold approval.

Overall, the Cabinet is recommended to approve the draft strategy.

2.4 Financial Implications

Potential liabilities under LATS would be substantial if the joint waste strategy is not adopted and implemented. There are no immediate costs associated with the approval of the joint strategy. In the medium to long term, the higher recycling targets will mean that the council would have to make further improvements to the recycling schemes it offers. Additional collection costs should be offset by reduced disposal costs and avoidance of LATS liabilities. Decisions would need to be made on a case-by-case basis.

2.5 Legal Implications

The council's response to the draft strategy will be reported to the WLWA board in January/February when all the responses will be considered. The final version of the strategy will be subsequently circulated to all the constituent authorities for approval. Once approved by WLWA and the six constituent authorities, the strategy will be submitted to the Mayor for London and DEFRA for final approval.

2.6 Equalities Impact

There are no adverse impacts on equality issues.

2.7 Section 17 Crime and Disorder Act 1998 Considerations

There are no considerations under the Crime and Disorder Act

Section 3: Supporting Information/Background Documents

Appendix A – Responses to the consultation.

Appendix B – Response to WLWA from West London Friends of the Earth

Background Documents: Draft joint waste strategy – a copy can be found in the Members Library.

Any person wishing to inspect the background papers should telephone 020 8424 1779

Appendix A – Responses to the consultation

Response No. 1

Whilst I entirely agree with the Council's policy of encouraging us to create less waste, re-use and recycle as much as we can, I am utterly against burning the residue in incinerators. Apart from the loss of the planet's resources, this strategy has the potential of causing so many health problems in West

London and beyond that the short term financial benefits will be vastly outweighed by the cost of treating the illnesses that will eventually occur. Please do not support this technology.

Response No. 2

Here are my observations, as requested:

When I read the article "War on Waste" in the October 2005 Harrow People Magazine I thought it was a sick joke! 'War'. What War? More like a stroll into Never-Never Land!

Look at the strength of the 'enemy'. All those manufacturers, advertisers and shops dedicated to sell, sell, sell. Who is on your side? Only charities, environmentalists and a few others; certainly not the government with its message of greater prosperity and stronger consumerism. The NHS may be dedicated to saving lives but has no interest in saving wastage. They regularly supply me with a 500g plastic container of ointment; very convenient with a dispenser nozzle but throw-away when 'empty' with about 10% of the contents still in it!

As for the quoted 'policies' there is not an ounce of real commitment in them and the last three are pure platitudes.

The so-called 'waste hierarchy' is a fraud.

Why, for example, should councils be solely responsible for collecting plastic milk containers while supermarkets are allowed do nothing about them? Why do not delivery milkmen gain some financial benefit for recycling their bottles? Perhaps councils would rather they didn't, on the basis that more clear glass recycled by the council would increase its income. If I judge correctly, then confess please.

Originally I did not intend to bother sending my comments, even though I used to be Harrow FoE's spokesman on waste until forced to retire due to ill-health, but having seen a copy of H.FoE's submission (by Bernard Burns) I just had to add my full endorsement to it. Clearly he has studied the proposals far more than I now can and has done an excellent job.

But I can add fresh insight to waste problems for people in my difficulties (I am now elderly, frail and housebound) so will deal with those matters first.

Once your LBH collectors know we customers they can be understanding, but then new ones arrive and fresh problems can arise. For example, we cannot move our two green boxes when full, nor sometimes the brown bin when heavy (added to its great bulk) to where you like them, so may be 'missed' by new staff, even though they are always in sight, then never get returned to where left. I know you can quote 'reasons' for that happening but social services should know where problems are (if they 'monitored' us), so some 'joined-up' LBH thinking is called for.

Appendix A – Responses to the consultation

We senior citizens, experienced wartime conditions and brought up knowing nothing should be wasted, are most likely less wasteful than the average person, but in declining years are more likely to now want to dispose of many recyclable or reusable items, yet cannot get to a recycling centre. 'Rag-and-bone' merchants have disappeared, so many things are retained until eventually the house get cleared and all goes into a skip. I firmly believe skip contents should be identified between builder's waste and domestic waste with the latter being councils' prime responsibility. Meanwhile, there is scope for dealing with the pre-skip situation.

I see nothing is said in the magazine about the risk of a government-imposed fine being passed on to council-tax payers. Why was that not mentioned? If it does happen, I and many others would regard it a 'the last straw'. Would the government like the publicity of someone who for years recycled all kitchen waste suddenly being being put in prison while profligate non-taxpayers are allowed go free?

One final point. I attempted to refer to the policy on the WLWA website. Yes, the pdf file downloaded ok but I found it was just one file of 237 pages and the only convenient way to read it was to print it all out.

Why could you not break it into several separate identifiable sections, so only the key parts need be downloaded? Alternatively also add a summary document.

I hope these points are of help.

Response No. 3

Regarding waste collection in Harrow. I recycle all my paper, glass, plastic, kitchen and garden waste, leaving very little to put in the green wheely bin. I am paying the same for this as people who do not recycle anything. I would like Harrow Council to start charging residents for the amount of waste they put in their rubbish bins. This might persuade more people to recycle.

Reduce -->The main aim to to note produce any rubbish at all.

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Make sure that all supermarkets in West London do not give free plastic bags to shoppers and instead sell the reuseable plastic bags or even better sell the reusable canvas bags. <http://www.netto.co.uk> already do this and there is no reason for the other main supermarket for not doing this also.

Nappies. All councils can give a free sample pack of a choice of the three post effective washable nappies systems to new mothers. This would be also given with a free voucher towards the cost of the mother buying more washable nappies.

Give out free front door stickers that say "NO! Junk Mail" "No. Junk mail and NO free newspaper" They have been years at home when I have just thrown away the free Harrow Times straight in the bin along with the junk mail and it is such a waste. Mail preference service what you have to contact to say that you don't want any more unsolicited mail. This should be the opposite. You

Appendix A – Responses to the consultation

should automatically expect everyone to NOT want this mail and you have to contact this company to put your name to get this junk mail. Most people are far too busy to spend their time sorting this sort of this out and anyway most people don't even know that you can do this in the first place. This is why it is better to assume no one wants this mail and you have to opt in.

I have worked on recycling all that I can in Harrow & I have been able to reduce my rubbish to under 1/3 (recycle - plastics to Hillingdon dump, cans, glass, clothes, electricals, furniture, paper, food & cardboard-Harrow collect at door step). This rubbish also includes disposable nappies which I plan to move over to washable. So from this I can see that "rubbish" (green bin rubbish) should be collected every 3 weeks and all the main recycled rubbish be collected more regularly.

Libraries. Extend their service. Offer more reference magazines & newspapers.

Reuse

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I am happy that Harrow is now introducing newspaper and cans bins in the streets. This is a good move.

It is possible to recycle 100% of all rubbish and those from the <http://www.foe.org.uk> can advise you on this. Absolutely everything can be reused and there is no need for adding harmful chemicals to our air with using incinerators which cost money and is not needed.

Wormers are great for those who don't have big gardens. This can be offered by the council at a low cost or free.

Better bins in the kitchen. I have 5 bins in the kitchen to separate my rubbish and life would be better if the council can design and provide at a low cost effective bins with 2 or more compartments. Many people feel that they don't have the room in their kitchen to have all the bins.

Education.

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Teach recycling in schools. Show residents how much we are saving in money & the environment when we recycle more. The more money that is spent on recycling the more money we have saved to spend on other things in life.

There is so much that can be done to eliminate the rubbish that is generated and I feel that the Friends of the Earth should be contacted for more ideas on this and they can offer practical solutions to this sort of thing.

Appendix A – Responses to the consultation

Response No. 4

HA21 – Waste Management Topic Group

Comments on WLWA draft joint waste strategy

Policy 1 – No comments – supported

Policy 2 – The group fully supports the prioritisation of waste reduction and reuse. There are concerns that this commitment is not matched with investment. We would like more money to be spent on waste minimisation where this is cost effective. Waste reduction and reuses is higher up the waste hierarchy and this should be reflected by the amount of investment. We would like to see investment in the following:-

- Reusable nappies. The council and WLWA should develop schemes in collaboration with the Health Service (PCT, hospitals, doctors surgeries, ante and post natal services etc.), nurseries, childminders, carers etc, to promote the use of reusable nappies. Providing information via the birth registry service should also be considered.
- Home composting. The council should advertise more widely the availability of subsidised home composters and the option of having a composter instead of a Brown Bin. The council should also consider offering wormeries and Green Cones as alternatives to home composters.
- Furniture reuse. The council should explore whether its special collection service could supply good quality furniture and white goods to the community sector for reuse. There is also scope for liaising with social services to help people furnish homes. The council could also promote web sites such as E Bay and Freecycle where goods could be advertised where appropriate.

Policy 3 – The group supports the targets set out in the draft strategy but urges the council to exceed them where possible. The group was concerned about levels of participation by the public and urges the council to review options (such as compulsory recycling and charging) if the targets are not being achieved after 2 or 3 years.

Policy 4 – The group supports the target of four materials from each household by 2008 and believes that the council should increase this to five materials by 2010 – one of which should be kitchen waste.

Policies 5, 6, 7 and 8 – The group supports the last four policies.

The group made three further comments:-

1. The council should provide facilities for the collection of household batteries at the civic amenity site.
2. The free service for the collection of hazardous waste (i.e chemicals, asbestos etc.) should be more widely advertised
3. The council should ensure that it leads by example in the treatment of its own waste (by waste minimisation and recycling) and encourages local businesses to do the same.

Appendix B – Responses to the consultation West London Friends of the Earth

Waste reduction and reuse are not being prioritised

1. This strategy does not take waste reduction and reuse seriously as priority issues. Policy 2 (vol1, p16) talks of prioritising waste reduction and reuse, but the total effect of all the planned measures is a meagre 0.3% per year of reductions. This is not surprising when the planned expenditure on this "priority" issue is £750,000 between now and 2020, less than 0.1% of the waste budget. So these are clearly not priorities for expenditure.
2. Policy 2 is almost meaningless if it cannot be verified. How can it be demonstrated, by the use of targets or indicators, that reduction and reuse are being prioritised over waste disposal (and even recycling)? For example, what is the amount spent per head on waste reduction versus waste disposal?
3. The £750,000 expenditure on waste reduction and reuse is expected to result in £14 million in savings (p20), in addition to its wonderful environmental impacts. This is a very good return on investment. Where is the research to show the effect on waste reduction if this budget were increased? It is not necessary to profit from this activity, so it is arguable that one should continue spending on waste reduction and reuse (as long as further waste reduction and reuse are being achieved) at least until the cost overtakes the savings.
4. There are many other waste reduction/reuse measures that should be implemented:
 - a. support and partnerships with reuse/repair organisations to improve markets;
 - b. special offers on different kinds of composters, for example wormeries, which can be used by people who don't have gardens;
 - c. promotion of green cones, to enable people to deal directly with all their kitchen waste (including meat, cooked food) and pet waste;
 - d. promotion of other pet waste digestors [eg. <http://www.armitages.co.uk/dogs3.htm>];
 - e. a junk mail campaign that includes mailing preference, targeting of door drops including free newspapers (in some areas they have a well recognised door sticker, which overcomes the problem of how to reach the various door droppers);
 - f. targeting education at households who dispose of a lot of waste.
5. Far more ambitious targets are needed for waste reduction, and they need to be made more visible, eg. annual target for waste reduction, annual expenditure per head on waste reduction versus disposal. The Mayor's Waste Strategy refers to the fact that Tokyo has succeeded in steadily reducing its waste tonnage for over ten years. Has this been investigated?
6. Reduction and reuse projections seem conservative. The target of 8% nappy diversion over a period of 14 years, 2006-2020, is based on results of the West Sussex initiative. But the West Sussex initiative began in 1999 and had already reached 9% diversion by 2004/5, ie. in less than 6 years, and has a target of 10% by 2005/6. Likewise, will the other composting and reuse measures investigated take 14 years to reach their modest targets?
8. The waste hierarchy is ignored when assessing different recycling collection options (vol2, p48). The recycling criterion gets a weighting of 3, while arisings growth gets a weighting of only 1.

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Arisings growth should be given a higher weighting than recycling, in order to prioritise waste reduction.

7. The free collection of garden waste adds to the total amount of waste collected, and should not be used solely to take advantage (as suggested in vol2, p60) of a weakness in the government's choice of performance indicators, to boost apparent recycling rates. This goes against the waste hierarchy.

9. The bags versus bins analysis (vol2, p67) is welcome, and clearly shows that sacks for residuals would help in waste reduction. The concerns about health, hygiene and vermin are surely much reduced by the fact that the residual bin should no longer have organic waste in it.

10. How well have reduction measures been monitored? Are compost bin promotions followed up? How many people are successfully using them, or having problems?

11. Once kitchen waste collection is in place, an early move to fortnightly collection of residuals should be prioritised. This would reduce costs, encourage waste reduction and recycling, and is acceptable to the public (vol1, p46). For this reason the interim collection options are unnecessary. It seems that the main barrier to early improvements in recycling rate is the lack of infrastructure to handle the collected materials (vol2, p80). Note - part of the conclusion on p80 is missing, as it suddenly ends in mid sentence.

Variable Charging can be and should be used

12. The Waste Minimisation Act 1998 gives local authorities the power to "do or arrange for the doing of anything" which is thought necessary or expedient for waste minimisation (vol1, p83). This would include variable charging.

13. Minister for the Environment Eliot Morley is on record as stating that he is in favour of enabling variable charging and would like to encourage local authorities to trial such schemes. [<http://www.pswg.org.uk/newsb.asp?id=4>] WLWA would be neglecting its duty if it were not to take up this invitation, which would profoundly reduce the quantity of waste disposed and therefore the size and cost of any residual waste disposal facility required.

14. A low cost alternative to microchips on bins is an option, proposed for use in Ireland, in which householders purchase tags to place on their bags or bins when they are to be collected - the more bags they require collected, the more tags they would have to buy.

15. Even without variable charging, rubbish metering itself would be valuable in terms of targeting information and education at those who dispose of the most.

Recycling and composting - more ambitious targets are needed

16. By what measurement can it be demonstrated that recycling and composting are being prioritised over waste disposal?

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17. The recycling targets of Policy 3 (vol1, p16) could be more ambitious. The Mayor's Waste Strategy supports the government's own Environment, Food and Rural Affairs Committee's recommended targets of 50% by 2010 and 60% by 2015. This appears to be the committee referred to in the final paragraph of p148 of vol1, whose targets will be tracked.
[<http://www.publications.parliament.uk/pa/cm200102/cmselect/cmenvfru/659/65904.htm>]

18. The Mayor's Strategy policy 58 asks authorities to develop recycling of packaging through partnership with obligated businesses. The WLWA seems to be ducking this opportunity - partnerships exist between business and authorities elsewhere in the country, for the collection of specific types of packaging, at no cost to the taxpayer. An example is tetrapak.

19. Recycling products need promotion and support in order to improve demand. For example councils need recycled purchasing policies, and compost produced from our waste should be sold back to us.

Residual Waste Management Options Assessment

20. Reference is made to government research into MBT (vol2, p138): "The Environment Agency is currently carrying out a consultation process..." This process actually completed in Feb 2005 and the results were published in June 2005.

21. The Environment Agency report states that MBT outputs can also be used to produce compost type materials, which can be spread on land, and if they meet certain conditions, can count towards diversion from landfill. This should be properly assessed as an option for MBT outputs, as it is higher up the waste hierarchy than energy recovery (via RDF).
[http://www.environment-agency.gov.uk/commondata/acrobat/the_final_outputs_1096040.pdf]

22. It is surprising to see anaerobic digestion score so low on compliance with waste policy (vol2, p170) as, according to the figures, but contrary to the commentary, it involves the most recycling. A closer look at the ranking of the waste hierarchy reveals the cause for AD's low score: an unexplained leap in points awarded to energy from waste (=3) over landfill (=1). In other words, taking the first step up the waste hierarchy gains more points than taking any subsequent step. This is unjustified. Sensitivity analysis shows that altering the scores for the options (landfill, EfW/recovery/AD, recycling/composting, reduction) from (1, 3, 4, 5) to (0, 1, 2, 3) or even to (1, 2, 3, 4) will result in incineration coming out joint worst in both cases.

23. It is not clear where incinerator bottom ash comes in the "End Product Liability Score" table 2.23 (vol2, p171). There have been problems in the past with bottom ash causing health problems when used as aggregate, and government departments disagree about its suitability for this purpose.

24. When combining the 7 environmental criteria (v2, p177), incineration comes out worst of all options. Its main benefit is supposedly its low cost, but how reliable are the cost estimates?

25. The costs estimates for the different technologies (v2, p166) are very close - 5% between the first three, 8% between the first five. Not much information is provided about the source of these

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estimates (p224). They are vulnerable to sensitivity analysis - for example, in the Mayor's strategy, MBT gate fees are assessed to be lower than incinerator gate fees.

[http://www.london.gov.uk/mayor/strategies/waste/docs/wastestrat_costing.pdf p16]

26. There are two significant cost risks associated with incineration that should be modelled:

a. Waste Strategy 2000 warned that "around 30 per cent of the capital costs of a conventional incineration facility is attributable to the flue gas clean-up system. This is likely to increase significantly as tighter discharge limits require the installation of additional treatments."

b. The current tax anomaly, which encourages only one step up the waste hierarchy, is likely to be corrected. There is growing support for an incineration tax, to ensure that the UK does not rely on incineration as a way to meet its targets under the Landfill Directive. The anomaly might also be corrected at a European level.

27. If local authorities are locked into long-term incinerator contracts which make it difficult to increase their recycling rates, they run the risk of not meeting their statutory recycling targets. This could occur them a penalty either way - from the incinerator company for not delivering the waste through-put agreed, or from the Government for failing to meet statutory targets. The Mayor's Strategy policy 96 requires that incinerator contracts must not include guaranteed minimum tonnages. This policy is not addressed in the strategy response (v1, p192).

28. The "Cost" criterion should include the external financial costs associated with environmental and health impacts, not least because external costs are quite likely to fall within the West London area. A useful source for this information could be the government report, published in December 2004: 'Combining the Government's two health and environment studies to calculate estimates for the external costs of landfill and incineration', HM Customs, 2004, <http://tinyurl.com/3wsyn>

29. The government report indicates that the environmental costs of incineration are at least as much as landfill, and probably slightly greater. This is not the first time the government has indicated that incineration should come below landfill on the waste hierarchy; they also made this point in their Waste Strategy 2000.

30. Table 5.1 (v1, p20) is confusing and may be misleading. "indicative cost: £170 million MBT gate fees (inc RDF disposal)... principal risks: market for RDF". Are the words "inc RDF disposal" in the cost column meant to imply a cost of disposal, rather than a revenue from RDF sale? Can costs and revenues be separately listed for clarity? If the cost is already being counted, why is "risk of RDF market" mentioned again in the risk column? Why is a larger capacity of MBT plant than incinerator plant required (400ktpa versus 240ktpa)? Why are the principal risks of incinerator plant (cost of higher pollution controls, or incineration tax) not mentioned?

31. A series of costs are provided on the "indicative costs and benefits" tables 5.1 to 5.14 (vol1 p99-113). These figures cannot be compared with each other as they are haphazard, inconsistent, therefore almost entirely meaningless, and potentially misleading. They are superseded by figures in volume 2 in any case, so should be removed.

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Environmental Policy Issues

32. The Mayor's Strategy policy 96, mentioned before, also requires any incinerator proposals to include: (1) pre-treatment of residual waste before incineration; (3) state of the art emissions limiting equipment; (4) CHP technologies to be used.

There is an ambiguous response to this (v1, p192). On (1) the Mayor's strategy is clearly referring to pre-treatment of residual waste after normal recycling and composting has been performed - the response does not clearly address this. The response to (3) implies that minimum legislative requirements will be met, rather than using state-of-the-art equipment. And the response that CHP will be used "where appropriate" implies that it will not be a fundamental consideration in the design of the system.

33. Objectives 6 and 8 (vol1, p15) are somewhat in conflict: 6 says "not necessarily the cheapest"; 8 says "minimise the costs".

34. The report should indicate which future government policies would help in meeting strategy objectives.

35. Policy 6: The wording plays down environmental impact. In keeping with the government's Waste Strategy, "Decisions should seek the best environmental outcome taking account of what is feasible and what is an acceptable cost."

36. There must be some means provided for residents to dispose of hazardous wastes, such as batteries, pesticides and other chemicals, in order to reduce the environmental impact of whichever residual waste management option is chosen. There is no facility in Harrow, for example, to dispose of batteries.

Errors

37. Vol2, p10, para 2: [composting] 1.6% of current household waste - should this be 16%?

38. Vol2, p164: on Road Transport it says "The anaerobic digestion option (3) performs worst" - anaerobic digestion is option 1, autoclaving is option 3. Is it anaerobic digestion or autoclaving that performs worst?

39. The term "Energy from Waste" is used inconsistently throughout the documents. Occasionally it is used in the correct general way, to cover several technologies, including incineration, gasification, pyrolysis, anaerobic digestion, which extract energy from waste. More commonly it is used misleadingly to apply only to incineration. This is confusing and even prejudicial. Please correct these references.