

Consultation on a Strategy for Hazardous Waste Management in England

Deadline for responses 13 October 2009

Response from Suffolk County Council with the support of the Suffolk Waste Partnership

Comments

The Strategy states in Paragraph 11 that it “does not seek to prescribe or set out in detail the treatment technique for every individual hazardous waste stream instead it seeks to set out a framework to help hazardous waste producers and hazardous waste managers find the best solution for their waste streams.”

Unfortunately, there is little information in this framework that enables these solutions to be delivered. In particular, it would have been useful to learn from the Strategy how much of what types of hazardous waste are being generated from what sorts of processes, and in which geographic locations.

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

The Principle of adhering to the EU waste hierarchy is supported.

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

The principles of self sufficiency and proximity principle are supported; however it is difficult to see how the market can ensure that the proximity principle is met, except insofar as it becomes less cost effective to transport materials for long distances. In practice, the reverse tends to be the case in that materials travel longer distances where there is less regulation on where it is treated.

It is correct to recognize that hazardous waste has always travelled across regional boundaries. The extent to which this occurs should be fully understood so as to ensure that the most sustainable pattern of waste management facilities is developed in each region. Action then needs to be taken to ensure that the regional distribution of facilities more closely matches regional arisings. The market alone will not deliver this position.

It is also difficult to see how the country as a whole will be self-sufficient in hazardous waste disposal through market forces.

Self sufficiency should apply not only to disposal, but also to recovery, recycling and reuse.

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

The needs for hazardous waste infrastructure identified in Annex C9 of Waste Strategy 2007 do not provide sufficient detail to actually plan for the facilities required.

In order to ensure that the required facilities are delivered, it is necessary to identify how much of each waste stream will arise in future years and broadly in which parts of the country. None of this information has been provided either in Waste Strategy 2007 or this consultation document.

Because the quantities involved are relatively small, a national approach to the planning of facilities is required. Even regional-level facilities are uneconomic for many of these waste streams. This Strategy was the ideal opportunity to propose a national pattern of facilities for different streams of hazardous waste.

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

The principle of reducing reliance on landfill is supported.

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

The principle of not mixing or diluting hazardous waste is supported.

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

The principle of not landfilling organic wastes as far as possible is supported.

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

The principle of ending the reliance on derogations is supported.

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

It is agreed that any hazardous waste treated to non-hazardous waste status should meet the relevant hazardous Waste Acceptance Criteria if it is to be sent to a non-hazardous landfill.

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

The decision trees do not clearly support the principles of the Strategy and are not easy to understand.

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

See question 8.

Question 10: Are the decision trees easy to follow or is more clarity needed?
No comment

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

See question 8. Additionally, examples would aid the ease of understanding the decision trees.

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

No comment

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

No comment

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

Yes.

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

Yes.

Question 16: Do you support this timeline for implementation?

The timeline for implementation is supported.

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