



## Commercial and Industrial Waste Sub-Strategy

### Report by the Waste Strategy Manager

#### 1.0 SUMMARY

- 1.1 The West Sussex local authorities work as a successful partnership in the prevention, collection, recycling and processing approximately 450,000 tonnes per annum of municipal solid waste. However, approximately 740,000 tonnes per annum is produced by the Commercial and Industrial (C&I) sectors in the county, 50% of which is landfilled.
- 1.2 The focus of the Joint Materials Resource Management Strategy (JMRMS) predominantly addressed the management of household waste and the development of robust collection schemes and the key infrastructure to support diversion from landfill. The Joint Commercial and Industrial Waste Strategy (JC&IWS) considers the next part of the JMRMS that addresses C&I waste, and looks to supporting local business, particularly Small and Medium Sized Enterprises (SMEs) in diverting waste from landfill.
- 1.3 This JC&IWS sets out a potential direction for the partnership's leadership on C&I waste, strengthening the JMRMS, to reduce the use of landfill.
- 1.4 The JC&IWS overall strategic aim is: "That West Sussex becomes a resource efficient County where waste material is either prevented from occurring or is physically recovered from all sectors and reintroduced to the market as either a resource, raw material, electricity or heat."
- 1.5 West Sussex Waste Authorities recognise that there is a need to move towards a more resource efficient approach to managing C&I waste within their areas to strive towards a zero waste economy. Aims and principles have been established to achieve this required step change through: education, information, re-use, recycling and recovery.
- 1.6 The initial three years actions within the JC&IWS will be delivered within the scope of the existing resources committed to waste management. Resources will be reviewed in line with the performance management framework, to support any policy developments.
- 1.7 It is proposed for all the West Sussex Waste Authorities to adopt the JC&IWS by end of March 2011.

#### 2.0 BACKGROUND

- 2.1 The JC&IWS (see Appendix A) was developed as a partnership with Adur District Council, Arun District Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Worthing Borough Council and West Sussex County Council. It is proposed for all the West Sussex Waste Authorities to adopt the JC&IWS by end of March 2011.

- 2.2 The Strategy is supported by the Environment Agency, Better Tomorrows (Community Interest Company), the West Sussex Sustainable Business Partnership, Business Link and the various waste contractors used across the County – Biffa Waste Services Ltd, Greenstar Ltd (now part of the Biffa Group) Serco, Veolia, and Viridor.
- 2.3 The JC&IWS is a sub-strategy to the Joint Materials Resource Management Strategy (JMRMS), which was also developed in partnership between the same local authorities.
- 2.4 The focus of the JMRMS predominantly addressed the management of household waste and the development of robust collection schemes and the key infrastructure to support diversion from landfill. The JC&IWS considers the next part of the JMRMS that addresses commercial and industrial waste, and looks to support local business, particularly Small and Medium Sized Enterprises (SMEs) in diverting their waste from landfill.
- 2.5 The District and Borough Councils in West Sussex, as Waste Collection Authorities (WCAs), are required to facilitate trade waste collections, where requested to do so, (for a fee) as part of their service of collecting waste. This service provision is offered within a competitive market with private waste management companies. The County Council has a duty to receive and arrange disposal of any such waste collected under these arrangements.

### **3.0 CURRENT POSITION**

- 3.1 The Local Authorities in West Sussex work as a successful partnership in the prevention, collection, recycling and processing approximately 450,000 tonnes per annum of municipal solid waste. However, approximately 740,000 tonnes per annum is produced by the Commercial and Industrial (C&I) sectors in the county, 50% of which is landfilled.
- 3.2 According to AEA Technology in 2009, C&I waste contributes 29% of the total waste in West Sussex, whereas the contribution from households is 17%.
- 3.3 Reliable data on C&I waste is difficult to ascertain, but it is estimated that the recession has caused a 20-30% drop in waste arisings. The Waste Forecast 2010 is currently being updated, and therefore the 2008/09 figures are as follows:

TREATMENT	TONNAGE p/a	PERCENTAGE p/a
For recycling/composting	250,000	33.8%
For landfill	374,000	50.5%
Other including energy recovery	116,000	15.7%
Total	740,000	100.0%

- 3.4 In view of the fragmented data surrounding C&I waste, Defra will be conducting a nationwide survey of C&I waste in 2010, for publication in 2011.
- 3.5 Adur and Worthing Council Services already collect commercial and industrial waste from large numbers of businesses throughout Adur and Worthing, including recyclable material. Adopting the JC&IWS will not require more finance or staffing resources from either Adur or Worthing Councils but will strengthen both Councils commitment to supporting local businesses, especially the SME sector.

## **4.0 DISCUSSION**

### **4.1 National Drivers**

- 4.1.1 In recent years there has been a raft of legislation aimed at encouraging more resource efficient use for unwanted resources such as materials, goods and products. This legislation is aimed at environmental protection, conservation and reuse of materials as well as avoiding the potential need to find new sites for landfill. It has been aimed at producers and consumers alike and seeks a radical change in resource use by 2020.
- 4.1.2 In November 2009, the Department for Environment Food and Rural Affairs (Defra) consulted on the possibility of changing the definition of municipal waste to bring it into line with European countries and will include biodegradable municipal wastes (BMW) that are similar in composition to household waste.
- 4.1.3 To ensure that local authorities comply with the requirements of the EU Landfill Directive, the Government introduced a system of tradable allowances (LATS) for the landfilling of BMW as part of the Waste and Emission Trading Act 2003. An allocation of the amount of BMW that can be landfilled each year from 2005/06 to 2019/20 was provided to the County Council.
- 4.1.4 Currently the implication of LATS on local authorities wishing to support the C&I waste sector in diverting waste from landfill, would place an additional financial burden on those authorities. This has historically led to authorities pricing the risk of exceeding allowances into their charges, thus making their rates uncompetitive when compared to the private sector.
- 4.1.5 However, a recent consultation issued by Defra, 'meeting EU landfill diversion targets', proposes not to extend the coverage of LATS as they acknowledge LATS may have understandably acted as a disincentive for local authorities to collect and treat C&I waste.
- 4.1.6 In March 2010, Defra issued a consultation on the introduction of restrictions on the landfilling of certain wastes. The aim of the consultation was to consider landfill restrictions for nine waste streams – electrical equipment, garden waste, paper and card, textiles, metals, wood, food waste, glass and plastics. The implications of this potential new legislation would be a key driver for C&I waste producers to actively seek alternative treatments to landfill.
- 4.1.7 Landfill tax is a tax payable for each tonne of waste sent to landfill and was introduced by the Government in 1996 as a way of encouraging more sustainable means of waste management through recognising the hidden financial effects of the environmental impact of landfill. The landfill tax is currently £48 per tonne for 2010/11, and it will increase by £8 per tonne each year until the tax reaches £80 per tonne by April 2014. After April 2014, there will be a floor of £80 per tonne, and the rate will not fall below this but could possibly increase. This increase in landfill tax will cause a significant increase in waste disposal costs and will provide a further incentive to move to more sustainable means of waste treatment in the near future.
- 4.1.8 The aim of the revised Waste Framework Directive (rWFD) is to promote waste prevention, increase re-use and recycling, and ensure better use of resources through recovery, while protecting human health and the environment. It re-enacts much of the existing WFD, but it contains a number of new features which could affect C&I waste:
- To apply the “waste hierarchy” as a priority order in waste prevention and management legislation and policy;

- To set up “separate collections” of waste for at least paper, metal, plastic, and glass by 2015 where technically, environmentally and economically practicable. This applies to both household and business waste; and
- To potentially apply a 50% recycling and composting target to C&I waste as part of municipal waste.

4.1.9 The rWFD places a new requirement on local authorities and private waste companies that collect waste from commercial and industrial premises to offer “separate collections” (which can be co-mingled collection) of paper, metal, plastic and glass by 1 January 2015. The terms on which the collection would be offered and its pricing would be left for commercial decision.

4.1.10 In June 2010 Defra announced a full review of waste policy in England, looking at the most effective ways of reducing waste and maximising the money that can be made from waste and recycling, that is ‘working towards a zero waste economy’. The review also covers new approaches to dealing with commercial waste and promoting ‘responsibility deals’, reducing the amount of waste generated by production and retail.

## 4.2 The Strategy

4.2.1 The JC&IWS sets out a potential direction for the partnership’s leadership on C&I waste, strengthening the JMRMS, to reduce the use of landfill.

4.2.2 The JC&IWS includes key policies, objectives and commitments for all the partners. It provides an action plan which follows the waste hierarchy of: waste prevention, reuse, recycling and composting, and recovery, to strive towards a zero waste economy.

4.2.3 The JC&IWS overall strategic aim is: “That West Sussex becomes a resource efficient County where waste material is either prevented from occurring or is physically recovered from all sectors and reintroduced to the market as either a resource, raw material, electricity or heat.”

4.2.4 The County Council and their partner Districts and Borough Councils recognise that there is a need to move towards a more resource efficient approach to managing commercial and industrial (C&I) waste within their areas and to strive towards a zero waste economy. Aims and principles have been established to achieve this required step change through:

- Education - Promote opportunities for education and examples of best practice within the business community in order to reduce the amount of C&I waste created in Sussex and to assist businesses in improving their financial efficiency;
- Information - Provide practical information to the business community to assist them in minimising resource use and achieving more resource efficient options for dealing with waste;
- Reuse - Increase the re-use of materials;
- Recycling - Increase composting and recycling. Initially, the JC&IWS will look to use the headroom available, due to a fall in household waste arisings, through the Recycling and Waste Handling Contract (RWHC) for the acceptance of C&I waste for at least the medium term; and
- Recovery - Increase the resource efficient recovery of remaining waste. The Warnham MBT facility will open in 2013/14 with spare capacity and again the opportunity would exist to offer this to deal with C&I waste for the medium term.

4.2.5 Due to the current review of waste policy and unknown outcomes of the recent consultations surrounding waste legislation and regulations, coupled with the arrival of the new Coalition Government and the Comprehensive Spending Review, it is proposed that the JC&IWS be a working document. The performance management framework developed to support the Strategy and its delivery, will include review periods built in every three years, to assess the strategic direction, any shifts in policy and legislation.

### 4.3 **Consultation**

4.3.1 West Sussex local authorities have been experiencing pressure from local SMEs to assist them to divert waste from landfill. SMEs within the County are keen to drive down the costs associated with waste management, and are therefore keen to recycle and avoid paying landfill tax. However, private contractors have little financial motive to offer recycling, so SMEs are limited in their ability to establish systems to recycle, aid economic development and ultimately strive towards a zero waste economy.

4.3.2 A 'Waste and Planning Roadshow' was held in January 2007, where key Members and Officers from the County, District and Borough Councils were brought together to debate and prioritise the issues relating to waste management in West Sussex. This event identified C&I waste as a key issue to be addressed, particularly as there are so many Small to Medium Enterprises (SMEs) within the County and many wish to recycle waste.

4.3.3 A workshop was also hosted by the partnership in July 2009 at which key stakeholders were invited to consider various issues relating to the development of the JC&IWS. A stakeholder engagement event was held in October 2009, to seek wider input and feedback to a draft Strategy. A second draft was then issued in January 2010 requesting further feedback from stakeholders. Since then, the partnership has been working with identified delivery partners such as waste contractors and trade associations, to finalise the Strategy and develop the associated action plan.

4.3.4 The JC&IWS has been developed through discussions with the Portfolio Policy Advisors, and was considered by the Minerals and Waste Development Framework Task Force in February 2010 and again in October 2010, following the change in policy under the new Coalition Government.

4.3.5 The West Sussex Inter Authority Waste Group (IAWG) has also been engaged in the process, particularly through the development of the supporting action plan for delivery and to develop some of the longer term strategic actions.

4.3.6 The JC&IWS forms part of a project within the Better Together, joint working initiative between the West Sussex local authorities, and as such has been supported by County Joint Leaders on 20<sup>th</sup> October 2010.

## 5.0 **FINANCIAL IMPLICATIONS**

5.1 The initial three years actions within the JC&IWS will be delivered within the scope of existing resources committed to waste management. The reality of the prevailing financial climate affecting all authorities in West Sussex is that the focus will be on those areas likely to generate income or savings through avoidable costs. For Adur and Worthing Councils this will undoubtedly be in the area of promoting the existing commercial recycling service already being offered.

5.2 The document will be reviewed on a three-yearly cycle to ensure that it continues to keep abreast of current events and opportunities. Further commitments would be highlighted and subject to further agreement before being adopted.

## **6.0 CONCLUSIONS**

- 6.1 The adoption of the JC&IWS by Adur and Worthing Councils will support the partnership approach to dealing with waste management that has been instrumental in delivering the comprehensive services across West Sussex.

## **7.0 RECOMMENDATIONS**

- 7.1 **The Cabinet Member is recommended to support the Commercial and Industrial Waste Strategy and commit to the key elements contained within it relating to Waste Collection Authorities.**
- 7.2 **That the Cabinet Member recommends the Commercial and Industrial Waste Strategy for adoption by full Council.**

### **Principal Author and Contact Officer:**

Paul Willis  
Waste Strategy Manager  
Recycling and Waste Management  
Tel: 01273 263052 / eMail: paul.willis@worthing.gov.uk

**Background Papers:** Joint Commercial & Industrial Waste Strategy for West Sussex 2010 – 2035

Appendix A Joint Action Plan 2010 - 2035

## **Schedule of other matters**

### **1.0 Council Priority**

- 1.1 To promote a clean and green environment – by encouraging local businesses to divert more of their waste away from landfill
- 1.2 To revitalise, regenerate and create lively economies – by seeking more efficient and affordable ways for businesses to deal with their generated waste, including avoidance where appropriate.

### **2.0 Specific Action Plans**

- 2.1 **(A)** Aim 2 (d) reduce the amount of waste being sent to landfill  
**(B)** Wider aims set out in the body of the report.

### **3.0 Sustainability Issues**

- 3.1 As set out in the body of the report

### **4.0 Equality Issues**

- 4.1 Matter considered and no issues identified

### **5.0 Community Safety issues (Section 17)**

- 5.1 Matter considered and no issues identified

### **6.0 Human Rights Issues**

- 6.1 Matter considered and no issues identified

### **7.0 Reputation**

- 7.1 The adoption of the strategy is likely to have a positive impact on the Council's reputation in that it directly addresses a need identified by the business community over many years.

### **8.0 Consultations**

- 8.1 As set out in the body of the report.

### **9.0 Risk assessment**

- 9.1 Currently, the Council does not have any obligations or statutory duties to reduce the amount of C&I waste being sent to landfill. However, this emphasis may change under the current review of waste policy.
- 9.2 The review of waste policy and the revised EU Waste Framework Directive suggest that targets could possibly be established at either a national or local level in the near future.

## **10.0 Health & Safety Issues**

10.1 Matter considered and no issues identified

## **11.0 Procurement Strategy**

11.1 Matter considered and no issues identified

## **12.0 Partnership working**

12.1 As set out in the body of the report



## Appendix A – Action Plan 2010-2013

### AIM 1 - Education

Promote opportunities for education and examples of best practice within the business community in order to reduce the amount of C&I waste created in Sussex and to assist businesses in improving their bottom line.

Provider	Commitment	Timescale
	<b>EVENTS</b>	
CBC	To support the annual Gatwick Diamond Green Business Awards	
CBC	To hold an annual 'Green Fayre' which businesses can attend to learn more about how to be 'greener', reduce	
MSDC	To actively support events such as the "Utilise" workshop at Wakehurst (Waste awareness and minimisation) and explore the potential for further events in coming years. (Mid Sussex held a similar event in 2008)	Ongoing
MSDC	To promote local and regional events which aim to "Match" supply needs for local businesses, including the forthcoming "Meet the buyer event"	July 2010
MSDC	To promote business events which will have a focus on waste reduction and sustainability i.e. "Open for Business"	Dec 2010
MSDC	Hosting a 'Sustainable Business' network event in the district	March 2012
WSSBP	Waste minimisation covered as part of UTILISE workshops	
	<b>VISITS</b>	
Olus	To include provision for education facilities and school visits when developing new facilities	
Olus	To continue to facilitate visits to existing operational sites	
	<b>ADVICE AND BEST PRACTICE</b>	
CBC	To continue with the current Green Business Programme which offers free advice and visits to companies to help implement environmental improvements which includes waste management	
CBC	To promote examples of best practice and provide guidance to businesses through local business newsletters, Council website and similar	
CDC	Identify and promote information sources for sustainable waste management to businesses	
CDC	Promote the benefits of waste minimisation, reduced resource use and recycling to the businesses community and provide direct advice and guidance to local businesses	
EA	To develop local partnerships to promote waste reduction, responsible waste management and good practice	
EA	To highlight the most suitable options for business to manage their waste and use resources wisely	
	<b>ECONOMIC DEVELOPMENT SUPPORT</b>	
A&WS	Provide education and advice concerning waste management to new businesses using the services of the Council's Economic Development Officers	
	<b>WIGEA SUPPORT</b>	
MSDC	Explore opportunities for the Waste Initiative Group – Education and Awareness, (WIGEA) to support future C&I initiatives at the	

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	direction of SWOG and IAWG	
	<b>ENFORCEMENT</b>	
ADC	Target business waste enforcement to ensure 100% compliance with having waste management and recycling contracts in place	Within 2010/11
CBC	To improve the enforcement of C&I waste through Duty of Care legislation in order to educate businesses on their correct obligations	
	<b>NETWORKING</b>	
CBC	To liaise and where possible support the many business networking and membership organisations such as CADIA	
	<b>MARKETING</b>	
A&WS	Continue to increase the proportion of businesses currently using the Council's recycling service through marketing and educational campaigns	
	<b>LONGTERM COMMITMENTS</b>	
CBC	To investigate options for increasing the Green Business Programme or similar service to offer guidance to businesses e.g. through Waste Prevention Advisors	
CBC	To investigate the possibility of employing a dedicated Business Waste Officer	
WSSBP	Waste minimisation covered as part of UTILISE workshops	

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### AIM 2 - Information

Provide practical information to the business community to assist them in minimising resource use and achieving more resource efficient options for dealing with unavoidable wastes.

Provider	Commitment	Timescale
	<b>AUDITING AND ENVIRONMENTAL REVIEWS</b>	
ADC	Reduce ADC waste to landfill (+ increased recycling) by 5%	Within 2010/11
BT	Business Waste Prevention Advisors. Increased useage & numbers of volunteers to promote waste reduction in association with the WSSBP	Ongoing
CBC	To continue with the current Green Business Programme which offers free advise and visits to companies to help implement environmental improvements which includes waste management	
CBC	To further reduce the amount of residual waste produced by the Town Hall and other Council owned premises and depots through it's operations. To include those services that are contracted out to third parties e.g. K2 leisure centre, Crawley Homes contractors	
MSDC	To undertake a waste audit of the District Council's offices by mid July 2010, and to formulate an action plan for such waste reduction by October 2010	July 2010 Oct 2010
MSDC	To promote and actively participate in Environmental reviews operated by the SPB, with action plan (embracing legal compliance WEEE, CO2 and water efficiency programmes, and to encourage local business to run follow up waste audits to monitor progress	
WSSBP	Waste auditing of businesses covered as part of Environmental Reviews	
	<b>WORKING WITH BUSINESS NETWORKS</b>	
A&WS	Provide education and advice concerning waste management to new businesses using the services of the Council's Economic Development Officers	
A&WS	Engage with the Federation of Small Businesses and other trade associations to ensure that the business community are aware of local recycling opportunities	
CDC	Promote the benefits of waste minimisation, reduced resource use and recycling to the businesses community and provide direct advice and guidance to local businesses	
MSDC	Work with local and Sussex based Business forums to signpost appropriate case studies, new services and to highlight legal compliance issues	
MSDC	To provide the Mid Sussex Business forums with updates on the emerging C&I WSCC strategy and to disseminate relevant information	
MSDC	Bring together representatives from all local business forums and associated groups into a combined meeting at which the issues can be explored and shared as a key issue for local Mid Sussex business	March 2011
WSCC	To access medium size hotels to utilise on-site composting for	

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	food waste and provide implementation support	
	<b>WEBSITE SUPPORT AND DEVELOPMENT</b>	
CBC	To create easily accessible information available on the council's website	
EA	To provide web based tools to help business make the right decisions	
MSDC	To develop the Mid Sussex website business pages to "sign post" local business 's (approx 5,660) towards local recycling and waste reduction advice	
	<b>INFORMATION REGARDING WASTES MANAGEMENT PROVIDERS</b>	
CDC	Identify and promote information sources for sustainable waste management to businesses	
EA	To provide data and information on the types and quantities of waste handled by permitted waste management facilities	
MSDC	Provide / update a list of authorised waste removal disposal companies operating in the Mid Sussex area. contact with SBP by December 2010	Dec 2010
MSDC	Provide / update a list of vetted Asbestos contractors operating in the Mid Sussex area, contact with SBP by December 2010	Dec 2010
WSSBP	Provision of recyclers list and helpline	
	<b>PROVISION OF 'END' PRODUCT</b>	
Olus	To continue to market and make available in a variety of options and quantities the high quality products produced onsite	Ongoing
	<b>SUPPORT TO OTHER DELIVERY PARTNERS</b>	
CBC	To continue being a partner of the West Sussex Sustainable Business Partnership	
EA	To assist WRAP and other delivery partners, in the work they do to support the business communities in becoming more sustainable	
MSDC	To play an active partner role within the West Sussex Sustainable Business Partnership (SBP) through the work of the Council's Sustainability Officer	
MSDC	Consider requests for support to the Better Tomorrows for relevant Sussex - wide C&I projects	
MSDC	To promote and actively participate in Environmental reviews operated by the SPB, with action plan (embracing legal compliance WEEE, CO2 and water efficiency programmes, and to encourage local business to run follow up waste audits to monitor progress	
	<b>LIAISING WITH KEY BUSINESS AREAS</b>	
WSCC	Identify 20 key business areas of waste arisings	
WSCC	Arrange dialogue with 4 key business players to determine their future plans for their waste and identify areas where the County Council can assist	
	<b>ENVIRONMENTAL MANAGEMENT SYSTEMS</b>	

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MSDC	To promote and encourage local business to operate Environmental Management Systems (EMS)	
	<b>CLIMATE CHANGE</b>	
CBC	New / revised Climate Change & Waste Management Strategy to include C&I waste	
	<b>REGULATION AND COMPLIANCE</b>	
A&WS	Continue to look for opportunities from businesses not currently complying with waste legislation through the regular checking of commercial waste contracts	
EA	To address the disparity in the way waste from different sources are regulated, focusing efforts where there is greatest risk, to reduce the burden of red tape on business to save time and money	
EA	To provide data and information on the types and quantities of waste handled by permitted waste management facilities	
EA	To continue to provide advice and guidance to businesses on all areas of waste legislation	
EA	To continue to make available information related to registered waste carriers and permitted waste sites so that businesses may have confidence in the credibility of waste management operators	
	<b>MONITORING AND REPORTING</b>	
WPA	To continue with the Annual Monitoring Report work which is prepared as part of the Minerals and Waste Development Framework. This is updated annually and reports on a range of data including: <ul style="list-style-type: none"> <li>• C&amp;I Waste arisings in West Sussex</li> <li>• How C&amp;I waste is being managed in West Sussex</li> <li>• Recycling rates by waste stream in West Sussex</li> <li>• Capacity of new waste management facilities in West Sussex</li> </ul>	Ongoing
	<b>LONGTERM COMMITMENTS</b>	
ADC and Verdant	Customer surveys/composition analysis (partnership with Verdant)	
ADC and Verdant	Education training programmes for local business (partnership with Verdant and other delivery bodies such as Better Tomorrows to be explored)	
BT	To help coordinate the recovery of waste cooking oils to become re-used as biofuels	Ongoing
CBC	To investigate into the possibility of employing a dedicated Business Waste Officer	
WSCC	Mapping of private and public sector waste management infrastructure available across West Sussex to enable SME's to have a clearer understanding of facilities available	
WSSBP	Provision of recyclers list and helpline	
WSSBP	Waste auditing of businesses covered as part of Environmental Reviews	

**AIM 3 – Re-Use**

Increase the re-use of materials

<b>Provider</b>	<b>Commitment</b>	<b>Timescale</b>
	<b>MATERIAL RE-USE AND RECOVERY</b>	
BT	Promotion of waste reduction and recycling in schools for chargeable household waste	
BT	Big Event waste - instigation of an on site segregation system using waste prevention advisors with the subsequent collection of recyclable waste. System established and run with European Funding. (Note that this is subject to winning funding)	Set up Oct 2010, and run for 2½ years
BT	Approach DIY retailing chains to promote the reuse of materials, and waste prevention	Ongoing
CBC	To encourage the re-use of materials within the Town Hall and other Council owned premises and depots. To include those services that are contracted out to third parties e.g. K2 leisure centre, Crawley Homes contractors	
CBC	To encourage more sustainable procurement	
EA	To continue to clarify when waste is fully recovered so that waste regulation controls no longer apply and recovery is made less onerous, thus reducing the burden on businesses that recover useful products from waste	
MSDC	To explore the potential for increasing the level of former mushroom compost and/or composted green waste as a bedding material or soil improver in our parks and open spaces	March 2011
MSDC	Mid Sussex to continue to re-use waste soil and sub soil from miscellaneous parks and landscape operations such as pitch drainage and playground installation etc. within sites for infilling low areas and creating bunds and mounds etc. to enhance the landscape and create new facilities such as for designated BMX	
MSDC	Mid Sussex landscapes team to seek to re-use obsolete landscape infrastructure materials and equipment in imaginative new ways to prevent it going to landfill (e.g. old wood post and rail play fencing to be re-cycled by local friends groups for barriers against paths to prevent damage to conservation woodland flora e.g. bluebells etc	
MSDC	To ensure all Mid Sussex tree work "arbor" arisings continue to be either composted or re-used	
All	The partners will take every opportunity to lobby Government and retail sector to examine the possibility of trialling take-back schemes such as refillable bottles	Ongoing
	<b>LONGTERM COMMITMENTS</b>	
BT	Carry out funding searches to assist in the development and implementation of this strategy	Ongoing
All	To investigate the options of setting up a virtual re-use / swap shop for businesses i.e. through a website	

**AIM 4 - Recycling**

Increase composting and recycling of unavoidable wastes

<b>Provider</b>	<b>Commitment</b>	<b>Timescale</b>
	<b>COLLECTION SERVICE</b>	
ADC	Disposal Infrastructure and Pricing – Explore and agree use of County facilities (Ford MRF), particularly for mixed recycling on the basis of commercially competitive and comparable prices being agreed (marginal costing all additional tonnage)	Within 2010/11
ADC and Verdant	Extend current mixed recycling services to wider range of Arun business customers <ul style="list-style-type: none"> <li>• Promote and encourage business partnership / groups joint commissioning</li> <li>• Target 10% customer base growth with Verdant as ADC Agent</li> <li>• Target Increased Recycling Tonnage (landfill avoidance) of 10%</li> </ul>	Within 2010/11
ADC and Verdant	Explore potential for launch or extend Green Waste Recycling to businesses (Establish service if demand and subject to WSCC approvals and/ or market outlets)	By end of 2012/13
ADC and Verdant	Explore potential and to launch Food Waste Recycling to businesses	By end of 2012/13
ADC and Verdant	Extend current mixed recycling services to wider range of Arun business customers, with particular emphasis on the following areas of work: <ul style="list-style-type: none"> <li>• Promote and encourage business partnership / groups joint commissioning</li> <li>• Target 15% customer base growth with Verdant as ADC Agent</li> <li>• Target Increased Recycling Tonnage (landfill avoidance) of 10%</li> </ul>	By end of 2012/13
ADC and Verdant	Explore offer of service contracts to all WSCC and ADC properties (Offices/community centres/swimming pools etc etc)	Within 2010/11
ADC and Verdant	Explore cross border working or commercial waste services provision	By end of 2012/13
A&WS	Promote AWCS Commercial Waste Service as an integrated product to encourage businesses to deal with recyclable as well as non-recyclable waste	
A&WS	Continue to investigate the practicalities of offering a more comprehensive and co-mingled recycling service. Early indications suggest that contamination is likely to be a particular problem and if this style of service is to be introduced a comprehensive communications strategy will need to be developed	
A&WS	Investigate the possibility of expanding the recycling service into immediate neighbouring areas to provide a recycling service for SMEs that would not otherwise have access to recycling services on account of their size	
BT	Promotion of waste reduction and recycling in schools for chargeable household waste	Within 3 years and long term

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CBC	To work with Veolia to try to increase their commercial recycling within Crawley (not currently part of the contract with the Council)	
CDC	Continue to provide to businesses in the district a separate chargeable cardboard and mixed papers recycling collection service offering a range of collection containers, with options available for collection frequencies	
CDC	Continue to provide to businesses in the district a separate chargeable green waste recycling collection service offering a range of collection containers	
CDC	Continue to provide to caravan and camping sites, schools, colleges and other education establishments, hospitals and other premises designated as chargeable household waste premises, free recycling collection services for cardboard, mixed papers, cans, plastic bottles, and other materials etc as are provided to domestic premises	
CDC	Introduce and make available to businesses in the district a chargeable mixed material recycling service, as provided to domestic premises, as soon as authority is provided by WSCC to deposit these materials at local recycling facilities	
HDC	Introduce a commercial industrial recycling service on completion of our Acorn Plus roll out. Rear end loading vehicles which are being replaced by side loading vehicles will be retained once new rounds are introduced and used to provide a commercial and industrial recycling service. At this time it is intended that three collection options will be offered these being: <ul style="list-style-type: none"> <li>• mixed paper and card</li> <li>• glass</li> <li>• mixed dry recycling (with the same specification as household recycling collections)</li> </ul>	
HDC	Currently a trial is being operated from which a business case for approval by members is being developed. It is anticipated that a report will be taken to members in September 2010 with an anticipated start date for the new service of January 2011. It is anticipated that the scheme will collect in excess of 1,500 tonnes in the first year	Jan 2011
MSDC	To revisit the options and business case for delivering a business (Cardboard & paper) recycling service to Mid Sussex business's, during 2010 – 2011	March 2011
MSDC	To jointly investigate with WSCC and private landowners the ability to increase the range of items that can be recycled at local Mid Sussex bring sites	March 2011
MSDC	To explore the options to expand the Council's garden composting service beyond the projected 12,800 subscribers capping level	March 2011
MSDC	Explore opportunities for joint service delivery in this or similar service areas with other local authorities in East and West Sussex	March 2012
	<b>REGULATION</b>	
EA	To administer Producer Responsibility laws for waste such as waste electronic and electrical equipment (WEEE), waste	



## Appendix A – Action Plan 2010-2013

	packaging and waste batteries, so that the companies that produce these are responsible for their collection, treatment and recovery	
All	The partners will take every opportunity to lobby Government and retail sector to standardise the type of plastic used in products and the labelling	
	<b>MINERALS AND WASTE CORE STRATEGY</b>	
WPA	The West Sussex Minerals and Waste Core Strategy will identify the recycling and composting capacity shortfall for C&I waste, and allocate sufficient strategic recycling and composting sites to meet that shortfall. The delivery of these sites will be monitored by the Core Strategy's monitoring and implementation framework, which will play an important role in identifying whether the C&I Waste Strategy's aim can be met	
	<b>DIRECT RECYCLING AND COMPOSTING ACTIONS</b>	
MSDC	To explore the extraction of recyclable materials from litter scavenge operations in the principal and most heavily used Parks and Open space sites areas in Mid Sussex	
MSDC	Mid Sussex landscapes team to specify the use of re-cycled tarmac and screened hardcore for path bases where appropriate to minimise use of new type one stone	
MSDC	To ensure all Mid Sussex tree work "arbor" arisings continue to be either composted or re-used	
MSDC	To improve recycling rates and waste reduction from the Council's office campus by adopting the action plan following our own internal waste audit	
Olus	To consider ways to utilise any operational headroom at existing composting sites (subject to planning and permitting)	
Olus	To continue to widen the stream of materials composted or recycled at sites. These materials currently include green waste, wood and rock wool slabs, but consideration will given to new material streams (subject to planning and permitting)	Ongoing
	<b>BUSINESS SUPPORT</b>	
WSCC	To access medium size hotels to utilise on-site composting for food waste and provide implementation support	
	<b>LONGTERM COMMITMENTS</b>	
ADC and Verdant	Develop and explore additional collection services such as kitchen waste and an increased range of plastics	
ADC and Verdant	Extended / joint procurement provision of C&I Waste Services	
ADC and Verdant	Develop and promote ADC / Verdant C&I Waste approach as model / exemplar for other businesses / Council's / areas	
BT	Carpets - Investigate the possibility of recovery of carpets into AD plants	
BT	Mattresses - Investigate the possibility of recovery of mattresses into AD plants	
CBC	To provide a comprehensive recycling collection service to businesses within Crawley	

## **Appendix A – Action Plan 2010-2013**

Olus	To identify new potential sites for the composting of materials (subject to planning) and to consider the development of a planning application for an additional facility	
WSCC	Utilisation of headroom within existing wastes management facilities, by making this available to the local business community (subject to planning and permitting)	
WSCC	Investigate the use of HWRSs by businesses (subject to planning and permitting)	

**AIM 5 - Recovery**

Increase the resource efficient recovery of remaining unavoidable waste

<b>Provider</b>	<b>Commitment</b>	<b>Timescale</b>
	<b>WASTE COLLECTION AND RECEPTION COMMITMENTS</b>	
CDC	Continue to provide to businesses in the district residual general waste collections, offering a range of collection containers, with options available for collection frequencies	
MSDC	To review arrangements with Mid Sussex contractors for the safe collection and transportation of clinical waste in light of a new WSCC disposal contract and increased requirements for the transport of dangerous goods	March 2011
	<b>MINIMISING NEGATIVE IMPACT</b>	
EA	To identify and advocate a variety of facilities to minimise environmental impact and maximise resource efficiency from biowastes	
EA	To continue the work of making waste crime unacceptable. Tackling those that undermine well run business	
	<b>LONGTERM COMMITMENTS</b>	
BT	Strategic Positioning of Anaerobic Digestion Plants. - To enter into discussions with Contractors and other stakeholders and promote the use of small AD plants in strategic locations such as business parks or for larger businesses. Envisage working closely with the West Sussex Sustainable Business Partnership, local authorities and business parks	
CBC	To implement an ESCo (Energy Services Company), which will require some form of 'waste' in order to produce the energy which means less going to landfill	
Viridor	To investigate further using the current Transfer Station network to bulk up C&I or Recyclable material which would either be brought in by Viridor collection vehicles, third parties, or bulked up from third party sites	
WSCC	Utilisation of headroom within existing wastes management facilities, by making this available to the local business community (subject to planning and permitting)	
WSCC	Investigate the use of HWRSS by businesses (subject to planning and permitting)	

# **Joint Commercial & Industrial Waste Strategy for West Sussex 2010-2035**

## **Sub-Strategy to the Joint Materials Resource Management Strategy for West Sussex 2005-2035**

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## **Foreword**

This Strategy builds on the West Sussex Joint Materials Resource Management Strategy (JMRMS) 2005-2035.

Over the past few years the local authorities in West Sussex have implemented improved collection systems and infrastructure to increase recycling and composting for the management of household waste. However, there is now an urgent need to implement the next stage of the JMRMS, to concentrate on the larger issue of commercial and industrial waste to further reduce the reliance on landfill.

This Strategy supports the national vision, which aims to enable people, businesses and local authorities to save money, improve resource efficiency and reduce the impact on the environment.

This partnership is aiming to ensure there is a suitable network of facilities for the recovery and, where necessary, disposal of all types of waste.

The focus will also be to consider the commercial and industrial wastes that arise in their areas and whether there are benefits in dealing with them together with similar household wastes.

In order to achieve this, the partnership will work with resource efficiency stakeholders to support and encourage businesses to scale the waste hierarchy.

The partnership has committed to lead by example and drive demand through sustainable procurement.

This Strategy sets out the scale of the challenge facing us, and the actions we will need to take to strive towards a zero waste economy. Achieving this shift will not be easy, and it will require the greater involvement of the commercial and industrial sector stakeholders. However, it is essential if we are to make a full contribution to delivering a better quality of life for West Sussex.

*[To be approved by IAWG on 26<sup>th</sup> January 2011]*

## **Executive Summary**

The West Sussex local authorities work as a successful partnership in the prevention, collection, recycling and processing approximately 436,000 tonnes per annum (excluding commercial waste collected by the local authorities) of municipal solid waste. However, approximately 716,000 tonnes per annum is produced by the Commercial and Industrial (C&I) sectors in the county, 44% of which is landfilled.

The focus of the Joint Materials Resource Management Strategy (JMRMS) predominantly addressed the management of household waste and the development of robust collection schemes and the key infrastructure to support diversion from landfill. The Joint Commercial and Industrial Waste Strategy (JC&IWS) considers the next part of the JMRMS that addresses C&I waste, and looks to supporting local business, particularly Small and Medium Sized Enterprises (SMEs) in diverting waste from landfill.

West Sussex local authorities have been experiencing pressure from local SMEs to assist them to divert waste from landfill. SMEs within the County are keen to drive down the costs associated with waste management, and are therefore keen to recycle and avoid paying landfill tax. However, private contractors have little financial motive to offer recycling, so SMEs are limited in their ability to establish systems to recycle, aid economic development and ultimately strive towards a zero waste economy.

The JC&IWS (see Appendix A) was developed as a partnership with Adur District Council, Arun District Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Worthing Borough Council and West Sussex County Council.

The Strategy is supported by the Environment Agency, Better Tomorrows (Community Interest Company), the West Sussex Sustainable Business Partnership, Business Link and the various waste contractors used across the County – Biffa Waste Services Ltd, Greenstar Ltd (now part of the Biffa Group) Serco, Veolia, and Viridor.

The JC&IWS overall strategic aim is: "That West Sussex becomes a resource efficient County where waste material is either prevented from occurring or is physically recovered from all sectors and reintroduced to the market as either a resource, raw material, electricity or heat."

West Sussex County Council (WSCC) and their partner Districts and Borough Councils recognise that there is a need to move towards a more resource efficient approach to managing C&I waste within their areas to strive towards a zero waste economy. The following aims and principles are considered key to achieving this required step change:

- **Education:** Promote opportunities for education and examples of best practice within the business community in order to reduce the amount of C&I waste created in Sussex and to assist businesses in improving their financial efficiency.

## Joint Commercial & Industrial Waste Strategy for West Sussex 2010-2035

- **Information:** Provide practical information to the business community to assist them in minimising resource use and achieving more resource efficient options for dealing with unavoidable wastes.
- **Re-use:** Increase the re-use of materials.
- **Recycling:** Increase composting and recycling of unavoidable wastes.
- **Recovery:** Increase the resource efficient recovery of remaining unavoidable waste.

The JC&IWS includes key policies, objectives and commitments for all the partners. It provides an action plan; which follows the waste hierarchy of: waste prevention, reuse, recycling and composting, and recovery, to strive towards a zero waste economy. The action plan will become part of the core business plan for each Local Authority.



## **Introduction**

Since the late 1990s West Sussex County Council (WSCC) and its partner District and Borough Councils have engaged with the community in a widespread debate about what should be done to manage household waste (more formally known as Municipal Solid Waste (MSW)).

The Joint Materials Resource Management Strategy (JMRMS) 2005-2035 was developed in partnership with the District and Borough Councils, to focus predominantly on the management of MSW through two key contracts. Since 2004 Viridor, (a private sector waste management company), has been managing the county's recycling through a network of Household Waste Recycling Sites (HWRSs), Transfer Stations (TFS), and a Materials Recycling Facility (MRF), and process in the region of 180,000 tonnes per annum. In 2010 WSCC signed a contract with Biffa Waste Services (another private sector waste management company) to build processing capacity to deal with 330,000 tonnes per annum of non recyclable waste.

In 2002 nationally the UK recycled less than 7% of its domestic waste. At that time, in West Sussex we achieved 13% and there were few specific collection systems, few processing plants, a limited market place and great uncertainty whether the aim of achieving 25% recycling levels for household waste could be reached.

In 2009/10 the West Sussex household waste recycling, composting and reuse rate reached 43% and this continues to rise. With new collection systems, upgraded HWRSs and ongoing promotion of recycling options, there is confidence that the target of 45% by 2015 will be met.

Systems have been introduced to boost recycling, such as standardised kerbside collections of recyclables from households, more bring bank systems, better services, staff training schemes, and space at the HWRSs. But the key to this improved performance has been the communication plan that supported the new services helping householders change their behaviour with respect to recycling. Participation and contribution rates are high and much of it is due to a planned and concerted behaviour change campaign which has used leaflets, radio and TV, personal visits by trained waste prevention advisors and general publicity of achievements.

## **Purpose of this Strategy**

The focus of the Joint Commercial & Industrial Waste Strategy (JC&IWS) is to build on the success of the JMRMS, follow the same approach of the behaviour change process through partnership working, and targets the Commercial & Industrial (C&I) sectors. Full public consultation accompanies the development of this document.

The West Sussex local authorities work as a successful partnership in the prevention, collection, recycling and processing approximately 436,000 tonnes of MSW. However, approximately 716,000 tonnes per annum (AEA Technology, 2010) is produced by the C&I sectors in the county, 44% of which is still landfilled (AEA Technology, 2010).

The JC&IWS is a key step in the development of the process for dealing with the County's overall waste arisings, and prescribes a framework that contributes to the overall management of C&I waste over the next 25 years. In order to support the aim of the JC&IWS, it includes key policies, objectives and commitments for all the local authorities and stakeholders in West Sussex and provides an action plan, reflecting the waste hierarchy, focused on waste prevention, re-use, recycling, and recovery – ultimately to reduce waste to landfill.

## **Section 1.0 Process Issues**

### **1.1 Partnership Arrangements – Key Roles and Responsibilities**

The JC&IWS has been developed in partnership with the:

- Waste Regulatory Authority – Environment Agency;
- Waste Planning Authority and Waste Disposal Authority – West Sussex County Council; and the
- Waste Collection Authorities – Adur District Council, Arun District Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, and Worthing Borough Council.

The County Council has a wide range of other roles, such as economic and social well being of its community, which has influenced it in taking the lead in the development of this Strategy. The means by which it fulfils this role is through the Local Strategic Partnership. This partnership involves public and private sector leaders/stakeholders and produces a plan of actions it deems necessary to make the County a better place. It sets and monitors targets which are binding on all the parties. These agreements are then made formally with Government and the County Council derives funding to help deliver based upon progress. This process will be used to discuss needs and targets for the processing of commercial and industrial (C&I) wastes.

#### **1.1.1 Waste Regulatory Authority**

The Environment Agency is responsible for the licensing and monitoring arrangements related to controlled wastes in West Sussex.

#### **1.1.2 Waste Planning Authority**

The County Council has a statutory duty to plan for the management and disposal of all wastes within the county. As the Waste Planning Authority, it is responsible for producing the Minerals and Waste Development Framework (MWDF).

#### **1.1.3 Waste Disposal Authority**

WSCC is a Waste Disposal Authority (WDA) with a responsibility to:

- ⇒ Arrange for the disposal of the controlled waste collected by the Waste Collection Authorities (WCAs);
- ⇒ Provide places at which the public in West Sussex may dispose of their bulky household waste and recyclables (Household Waste Recycling Sites – (HWRS)); and
- ⇒ Carry out environmental monitoring of WSCC operated and/or owned closed landfill sites to reduce their impact on the environment.

As a Waste Disposal Authority, WSCC does have a duty to receive and arrange for the disposal of any commercial waste collected by the District and Borough Councils of West Sussex.

#### **1.1.4 Waste Collection Authority**

District and Borough Councils in West Sussex, as Waste Collection Authorities (WCAs), are required to facilitate trade waste collections, where requested to do so, (for a fee) as part of their service of collecting wastes. This service provision is offered within a competitive market with private waste management companies. The County Council has a duty to receive and arrange disposal of any such waste collected under these arrangements.

#### **1.2 Effective Partnership Working**

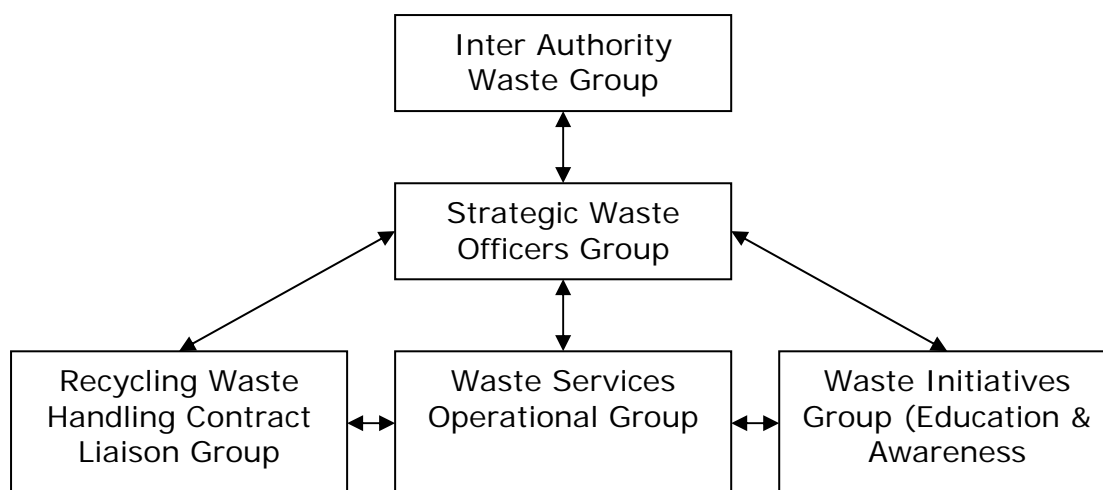
To ensure the effective joint working of these agencies, a number of county-wide inter-authority working groups were established some years ago. These are:

- Inter-Authority Waste Group (IAWG) – the Council members responsible for the waste management portfolio across the West Sussex authorities;
- Strategic Waste Officers Group (SWOG) – the directors/senior managers responsible for waste management policy from across the local authorities, and the Environment Agency;
- Recycling Waste Handling Contract (RWHC) Liaison Group - the waste managers from across the local authorities;
- Contract Management Liaison Group- the waste operational officers from across the local authorities; and
- Waste Initiatives Group for Education and Awareness (WIGEA) - the recycling/waste prevention officers from the local authorities. This group also addresses implementation of waste prevention and education issues.

These groups enable the effective communication and ownership of operational and strategic waste issues across West Sussex.

#### **1.3 Decision-Making & Management Structure**

The organisational structure and processes behind the on-going development and delivery of the Joint Materials Resource Management Strategy (JMRMS) are illustrated below.



#### 1.4 Stakeholder Engagement

A wide and varied number of stakeholders have been engaged throughout the development of the JMRMS and the JC&IWS for West Sussex.

As part of its ongoing commitment to community consultation, in January 2007 the partnership hosted a 'Waste and Planning Roadshow' where key Members and Officers from the County, District and Borough Councils were brought together to debate and prioritise the issues relating to wastes management in West Sussex.

This event identified C&I waste as a key issue to be addressed, particularly as there are so many Small to Medium Enterprises (SMEs) within the County and many wish to recycle wastes. Now that the long-term future of MSW has been planned for, it is considered an appropriate time for the partnership to turn its attention to C&I waste.

A workshop was hosted by the partnership on 13<sup>th</sup> July 2009 at which key stakeholders were invited to consider various issues relating to the development of the JC&IWS. The first draft of the Strategy was then circulated to identified stakeholders during October 2009, with a stakeholder engagement event being held on 21<sup>st</sup> October 2009, to seek wider input and feedback to the draft Strategy. A second draft was then issued in January 2010 requesting feedback from stakeholders by end of February 2010. Since then, the partnership has been working with identified delivery partners such as waste contractors and trade associations, to finalise the Strategy and develop the first 3 years action plan.

The local authorities within West Sussex are committed to maintaining this high level of engagement, and view stakeholder involvement as crucial to the development and implementation of this Strategy.

#### 1.5 Hierarchy of Waste Policy

The JC&IWS sits within a range of other key relevant strategies and policies.

## **European**

### **EU Waste Framework Directive**

Government is required to transpose the requirements of the European Union's revised Waste Framework Directive (rWFD) by 12 December 2010. The purpose of the rWFD is to promote waste prevention, increase recycling, and ensure better use of resources. For further detail, please refer to para. 2.1.7 below.

## **National**

### **Existing National Policies:**

#### **Waste Strategy for England, 2007**

The main aim of the Waste Strategy is to reduce the amount of waste going to landfill by applying the waste hierarchy to the way that waste is managed. The Strategy does not set targets for the management of C&I waste. The Waste Strategy for England 2007 is further discussed below in para. 2.1.1.

#### **Planning Policy Statement 10: Planning for Sustainable Waste Management, 2005 (PPS10)**

PPS10 sets out the Government's national policies which need to be taken into account by waste planning authorities and forms part of the national waste management plan.

### **Emerging/Review of National Policies:**

#### **Decentralisation and Localism Bill**

The Decentralisation and Localism Bill is due to be introduced in November 2010 and is expected to be passed in November 2011. The Bill will devolve greater powers to councils and neighbourhoods and give local communities control over housing and planning decisions.

#### **Review of Waste Policy**

The Government is carrying out a full review of waste policy in England. The review will look at all aspects of waste policy and waste management in England to ensure that we are taking the right steps to delivering the Government's ambition of 'working towards a zero waste economy'. For further information see para. 2.1.8 below.

## **Regional**

### **Regional Spatial Strategy - The South East Plan**

The South East Plan (2009) set targets for the management of C&I waste. The Secretary of State announced the revocation of Regional Spatial Strategies (RSS) on 6 July 2010. A subsequent successful high court challenge has found this decision to be unlawful and RSS are effectively re-established as part of the development plan. However the Secretary of State wrote to Local Planning Authorities on 27 May 2010 informing them

of the Government's intention to abolish RSS in the Decentralisation and Localism Bill, which is expected to begin its passage through Parliament before Christmas 2010. This should be regarded as a material consideration in planning decisions.

The Decentralisation and Localism Bill will result in further changes to the planning system and the government has also begun a review of national waste policy which will result in changes to waste policy in the future. However, until further detail is provided regarding these changes, national and local policy drivers remain in place.

### **1) Waste Targets**

When the South East Plan is abolished through the Localism Bill, targets for the management of waste will be developed through the preparation of the new planning policy documents within the Minerals and Waste Development Framework (MWDF).

### **2) London Waste**

When the South East Plan is abolished through the Localism Bill, the County Council will no longer be required to identify non-inert landfill capacity for residual waste from London.

## **Local**

### **Sustainable Community Strategy**

The Sustainable Community Strategy (SCS) sets out a vision for the County and identifies the aspirations of communities and individuals throughout West Sussex. The SCS was endorsed by County Council in October 2008. The SCS aims to minimise waste and pollution, and use resources effectively, efficiently and in a sustainable manner.

### **Minerals and Waste Development Framework (MWDF)**

The MWDF is a collection of current and emerging planning policy documents that outline how minerals and waste development will be managed in West Sussex. The Minerals and Waste Core Strategy is the principal document in the MWDF and will set out the spatial vision, objectives and strategy for delivering waste development in West Sussex. It will play an important role in setting waste targets and enabling the delivery of the infrastructure required to manage C&I waste in West Sussex, primarily through the allocation of strategic sites for managing C&I waste.

The draft West Sussex Waste Local Plan, although not part of the statutory development plan, is part of the MWDF and was approved by the County Council for development control purposes in December 2005. It will be replaced by the Core Strategy.

## **1.6 Strategic Environmental Assessment**

A key requirement is for local authorities to subject draft Municipal Waste Management Strategies to a Strategic Environmental Assessment (SEA).

**Joint Commercial & Industrial Waste Strategy for West Sussex 2010-2035**

This ensures that local, environmental, social and economic issues are considered in the drafting of a new strategy.

As the JC&IWS is a Sub-Strategy to the JMRMS and follows the same principles, it was not necessary for this Strategy to be subject to an SEA.



## **Section 2.0 Where Are We Today?**

### **2.1 Drivers for Change - Legal Obligations**

In recent years there has been a raft of legislation aimed at encouraging more resource efficient use for unwanted resources such as materials, goods and products. This legislation is aimed at environmental protection, conservation and reuse of materials as well as avoiding the need to find new void space for landfill sites. It has been aimed at producers and consumers alike and seeks a radical change in resource use by 2020.

Most legislation on waste and resources has been developed within the EU and transferred into UK Law. Successive Governments have also used policies, targets and fiscal means to ensure implementation e.g. packaging targets and landfill tax.

#### **2.1.1 Waste Strategy for England 2007**

Since the JMRMS was developed in 2004, the Waste Strategy for England 2007 builds on the Waste Strategy 2000 and the progress since then, but aims for greater ambition by addressing key challenges for the future through additional steps. One of the main elements of this Strategy is to “increase the engagement of business and the public by communicating and supporting the changed behaviour needed by us all – with Government taking the lead.”

The Waste Strategy 2007 goes on to talk about “encouraging local authorities to take on a wider role (in partnerships) to help local (particularly smaller) businesses reduce and recycle their waste with cost savings through more integrated management of different waste streams.”

#### **2.1.2 EU Landfill Directive**

The European Commission has set challenging targets to ensure that the necessary steps towards sustainable waste management are made. The EU Landfill Directive, which came into force on 16th July 2001, is the main driver behind this. The Commission introduced the following mandatory targets to reduce the amount of biodegradable municipal waste (BMW) going to landfill.

- By 2010\* reduce biodegradable municipal waste landfilled to 75% of that produced in 1995.
- By 2013\* reduce biodegradable municipal waste landfilled to 50% of that produced in 1995.
- By 2020\* reduce biodegradable municipal waste landfilled to 35% of that produced in 1995.

\* Includes 4 year derogation

When biodegradable (organic) waste decays it gives rise to methane and CO<sub>2</sub>, major greenhouse gases, and a liquid leachate that can pollute ground and surface water.

The Landfill Directive requires that landfill sites are classified as hazardous, non-hazardous or inert and effectively ends the co-disposal of hazardous and non-hazardous wastes. It also bans the landfilling of certain wastes such as tyres from 2003, and requires that all waste going to landfill will have to be pre-treated to reduce its environment impact. The UK is implementing these targets for BMW through the tradable allowances scheme.

### 2.1.3 Waste and Emissions Trading Act

To ensure that local authorities comply with the requirements of the EU Landfill Directive and 'Waste Strategy 2000', the Government introduced a system of tradable allowances for the landfilling of BMW as part of the Waste and Emission Trading Act 2003. An allocation of the amount of BMW that can be landfilled each year from 2005/06 to 2019/20 was provided to WSCC, and these are shown below, along with the actual BMW tonnages landfilled to date.

Landfill allowance allocation

Year	Allocation tonnes of BMW	Actual tonnes of BMW landfilled	Year	Allocation tonnes of BMW
Base Year	265,565	N/A	2012/13	119,663
2005/06	256,974	219,282	2013/14	114,530
2006/07	244,087	209,143	2014/15	109,397
2007/08	226,905	197,986	2015/16	104,264
2008/09	205,428	178,101	2016/17	99,131
2009/10	179,655	157,804	2017/18	93,998
2010/11	159,657		2018/19	88,865
2011/12	139,660		2019/20	83,732

It is possible to trade allowances between authorities to alleviate any local shortfall of treatment capacity. The penalties for having insufficient allowances for the BMW landfilled are costly, having been set at £150 per tonne. The implication of this is that most authorities plan to meet these targets and thus trading is likely to be minimal in the longer term. It was anticipated that in the short term there may be potential for trading whilst infrastructure for waste treatment is developed. However, due to the significant decrease in national household waste arisings, little trading has actually taken place to date, resulting in relatively low cost permits being bought and sold. WSCC has not undertaken any trading activity to date.

To ensure that local authorities comply with the requirements of the EU Landfill Directive, the Government introduced a system of tradable allowances (LATS) for the landfilling of BMW as part of the Waste and Emission Trading Act 2003. An allocation of the amount of BMW that can

be landfilled each year from 2005/06 to 2019/20 was provided to the County Council.

Currently the implication of LATS on local authorities wishing to support the C&I waste sector in diverting waste from landfill, would place an additional financial burden on those authorities. This has historically led to authorities pricing the risk of exceeding allowances into their charges, thus making their rates uncompetitive when compared to the private sector.

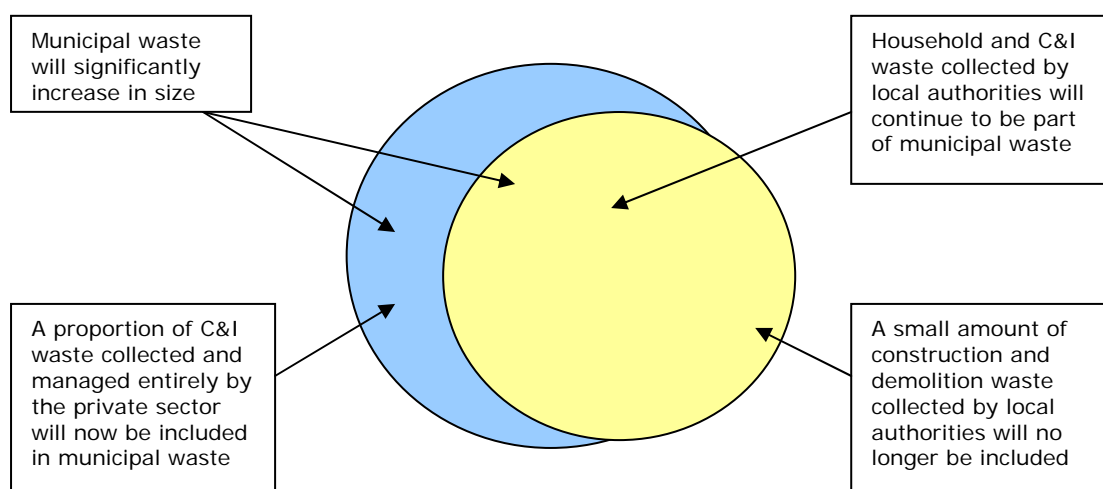
However, a recent consultation issued by Defra, 'meeting EU landfill diversion targets', proposes not to extend the coverage of LATS as they acknowledge LATS may have understandably acted as a disincentive for local authorities to collect and treat C&I waste.

#### 2.1.4 Definition of Municipal Waste (MSW)

In November 2009, the Government consulted on the possibility of changing the definition of municipal waste to bring it into line with European countries and will include biodegradable wastes that are 'similar commercial and institutional wastes' and 'other waste which because of its nature or composition is similar to waste from households'.

This change in the UK would bring a further 68m tonnes of wastes into the municipal category. The aim of the recent consultation on the legal definition of waste and its application is to help businesses and other organisations take the right decisions about the classification of substances as waste, particularly in the more difficult cases. The partnership is already working closely with the Department for Environment Food and Rural Affairs (Defra) on this issue and will continue to develop this Strategy in conjunction with Defra so delivery can be underway at the earliest opportunity.

The diagram below illustrates the affect of a change in the definition of municipal waste:



#### 2.1.5 Landfill Restrictions/Bans

In March 2010, Defra issued a consultation on the introduction of restrictions on the landfilling of certain wastes. The aim of the consultation was to consider landfill restrictions for nine waste streams – WEEE, garden waste, paper and card, textiles, metals, wood, food waste, glass and plastics.

In response to this, the consultation included the following options:

- Do nothing and rely on current measures e.g. landfill tax;
- Introduce bans on their own or accompanied by a requirement for waste to be sorted.
- Introduce a sorting or tougher pre-treatment requirement without a landfill ban; or
- Introduce producer responsibility requirements for certain wastes.

If introduced the restrictions will have an impact on waste management practices that will need to time to put in place. This will include the need to ensure the C&I sector are aware of their responsibilities under duty of care. The implications of this potential new legislation would be a key driver for C&I waste producers to actively seek alternative treatments to landfill.

The consultation also raised questions around the funding and policing of any system introduced.

### **2.1.6 Landfill Tax**

Landfill tax is a tax payable for each tonne of waste sent to landfill and was introduced by the Government in 1996 as a way of encouraging more sustainable means of waste management through recognising the hidden financial effects of the environmental impact of landfill. The landfill tax is currently £48 per tonne for 2010/11, and it will increase by £8 per tonne each year until the tax reaches £80 per tonne by April 2014. After April 2014, there will be a floor of £80 per tonne, and the rate will not fall below this but could viably increase.

This increase in landfill tax will cause a significant increase in waste disposal costs and will provide a further incentive to move to more sustainable means of waste treatment in the near future.

Businesses and their representative bodies, e.g. Chambers of Commerce, have been concerned not only about the rising costs of waste disposal due to annual increases of £8 per tonne in landfill tax, but also the difficulty of finding the means to avoid higher costs through alternatives such as recycling or improved resource and raw material management.

### **2.1.7 EU Waste Framework Directive**

The UK has to bring in domestic legislation giving effect to the revised EU Waste Framework Directive (WFD) by 12<sup>th</sup> December 2010. Defra and the Welsh Assembly Government (WAG) are consulting on draft Regulations to bring the revised WFD into effect in England and Wales.

The aim of the revised WFD is to promote waste prevention, increase re-use and recycling, and ensure better use of resources through recovery, while protecting human health and the environment. It re-enacts much of the existing WFD, and leaves the legal definition of waste unchanged, but it also contains a number of new features.

This is a short summary of the key points of the draft Regulations on which Defra and WAG are seeking views.

The main new features of the revised WFD are that it requires Member States:

- To apply the “waste hierarchy” as a priority order in waste prevention and management legislation and policy;
- To set up “separate collections” of waste for at least paper, metal, plastic, and glass by 2015 where technically, environmentally and economically practicable. This applies to both household and business waste;
- To recycle 50% of waste from households by 2020;
- To recover 70% of construction and demolition waste by 2020.

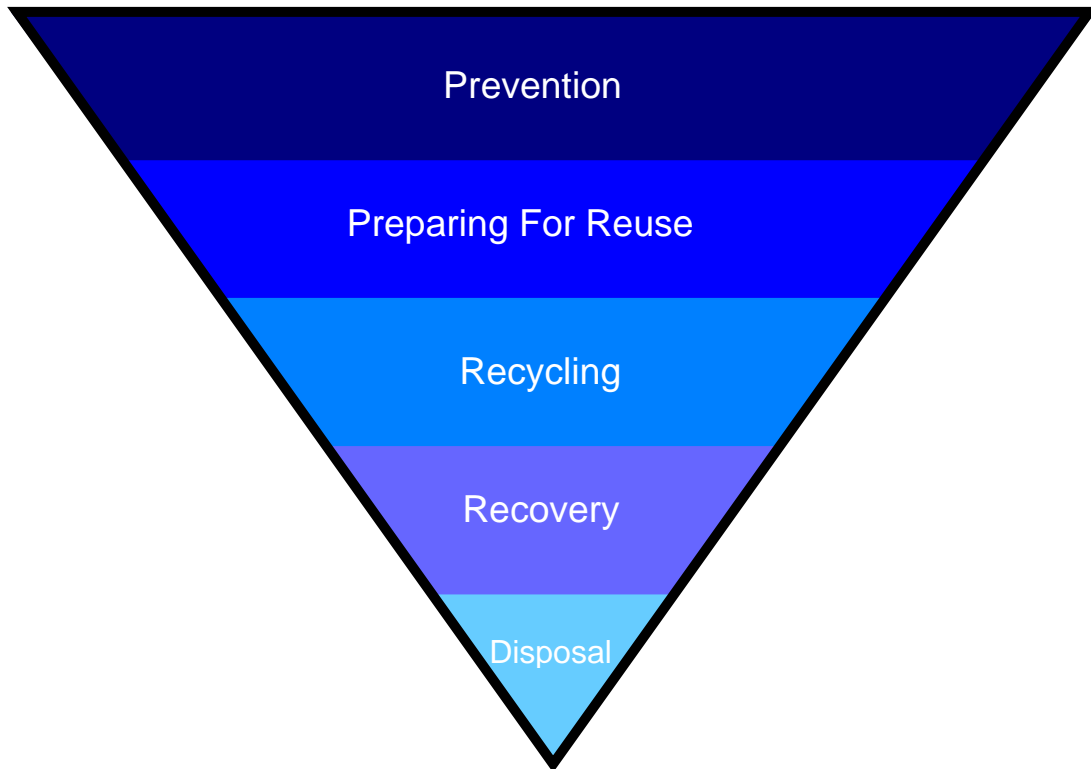
The draft Regulations would place a new requirement on local authorities and private waste companies that collect waste from commercial and industrial premises to offer “separate collections” (which can be co-mingled collection) of paper, metal, plastic and glass by 1 January 2015. The terms on which the collection would be offered and its pricing would be left for commercial decision.

The revised WFD requires Member States to take measures to achieve a target of preparing for re-use and recycling at least 50% of waste from households (including at least paper, metal, plastic, and glass) by 2020.

The Commission has clarified that Member States may interpret this target in one of four ways; by applying the 50% target to each of the four waste materials individually; by applying it to the four in aggregate; by applying it to the totality of waste from households; or by applying it to all municipal waste. The approach that Defra and WAG propose to take is to apply the 50% target to all waste from households. No additional measures are proposed to meet the target at this stage, as England and Wales are on course to achieve the target thanks to existing measures, notably the landfill tax.

#### **2.1.7.1 The Waste Hierarchy**

The waste hierarchy has to be given legal effect as a priority order. The priority order is: waste prevention; preparing for re-use; recycling; other recovery (e.g. energy recovery); and finally disposal. The revised WFD allows for departure from the hierarchy where that would deliver a better overall environmental outcome.



Source: <http://www.defra.gov.uk/corporate/consult/waste-review/100729-waste-review-call-for-evidence.pdf>

The consultation proposals would implement this in England and Wales by:

- Updating national planning policy to reflect the new waste hierarchy and requiring local authorities to have regard to the hierarchy in the preparation of waste development frameworks in England and, in Wales, local development plans and regional waste plans;
- Requiring the Environment Agency and local authorities to include a condition in new or revised waste permits placing a duty on the permit holder to take measures to minimise waste and treat any waste generated by a permitted waste operation in accordance with the hierarchy;
- Amending the existing “duty of care” requirement which applies to those who produce, hold and carry waste, to add a declaration on their Waste Transfer Notes confirming that they have taken the hierarchy into account;
- When meeting their duty of care, requiring businesses and local authorities to have regard to Government guidance on the practical application of the waste hierarchy, including on the circumstances in which departure from the hierarchy is likely to give a better environmental outcome.

### **2.1.8 Review of Waste Policy**

In June 2010 Defra announced a full review of waste policy in England, looking at the most effective ways of reducing waste and maximising the money that can be made from waste and recycling.

The Government's ambition for waste management in England was defined in the Coalition's Programme for Government and Defra's Structural Reform Plan as 'working towards a zero waste economy'.

Environment Secretary, Caroline Spelman, said: "There is an economic and environmental urgency to developing the right waste strategy. We have been slowly moving in the right direction with recycling rates. We need to go faster and we need to go further. We need a new approach to waste – one which works for the new economy."

The review covers the effect of waste policies on local communities and households; maximising the contribution of the waste and recycling industries to the UK economically and environmentally; working towards a 'zero waste economy'; and new approaches to dealing with commercial waste and promoting 'responsibility deals', reducing the amount of waste generated by production and retail.

The purpose of the review is to look at all aspects of waste policy and waste management in England to ensure that we are taking the right steps to delivering this ambition.

### **2.1.9 EC Directive on Packaging and Packaging Waste**

The EC Directive on Packaging and Packaging Waste (94/62/EC, as amended – hereafter referred to as "the Packaging Directive") aims to harmonise the management of packaging waste by minimising the impact of packaging and packaging waste on the environment and by avoiding obstacles to trade and distortion and restriction of competition within the Community.

The Directive as amended set down minimum recovery targets (60%) and recycling targets (55%) for packaging waste, to be met by 31 December 2008, as well as material-specific recycling targets. These are 60% for glass, 60% for paper and board, 50% for metals, 22.5% for plastics, and 15% for wood.

From 2008, Member States must continue to meet these minimum targets, but they have the freedom to set higher targets if they so choose.

The Producer Responsibility Obligations (Packaging Waste) Regulations (the Packaging Regulations) implement the Packaging Directive through a system of 'producer responsibility', which is an extension of the 'polluter pays' principle. This system makes producers (businesses that handle more than 50 tonnes of packaging per annum and have an annual turnover of over £2 million) responsible for meeting their share of the targets listed above, based on their role in the supply chain and the amount of material handled in the preceding year.

The Packaging Regulations transpose the Packaging Directive targets into a set of UK '*business targets*' which reflect the UK packaging market and waste arisings. These targets currently run until 2010. The UK therefore need targets for 2011 onwards, to ensure that the UK continues to

achieve the Directive's recovery and recycling targets, and to encourage greater resource efficiency and reduction in greenhouse gas emissions.

### 2.1.9.1 The Packaging Strategy - The way forward for packaging recycling

Making the Most of Packaging: a Strategy for a Low Carbon Economy was published in June 2009. The key aim of the Strategy is to minimise the environmental impact of packaging over its whole life cycle, without compromising its ability to protect the product. This can be achieved through optimising packaging, and through maximising the recycling of packaging waste. On the latter, the Strategy sets out the UK's ambition to work towards the recycling rates achieved by the best EU performers. As the following table shows, in 2008 the UK met, and in some cases exceeded, the targets set by the Packaging Directive.

#### UK packaging recycling and recovery achievement, 2008

	Total Waste	2008 Summary	Directive Target	Achievement
Paper	3,839,000	3,062,946	60%	79.8%
Glass	2,630,000	1,613,310	60%	61.3%
Aluminium	145,000	50,214		34.6%
Steel	676,000	417,261		61.7%
Metal	821,000		50%	56.9%
Plastic	2,185,000	516,841	22.5%	23.7%
Wood	1,198,000	940,460	15%	78.5%
<b>Total Recycling</b>		<b>6,601,032</b>	<b>55%</b>	<b>61.7%</b>
EfW		426,891		
<b>Total Recovery</b>		<b>426,891</b>		
<b>Total</b>	<b>10,695,000</b>	<b>7,027,923</b>	<b>60%</b>	<b>65.7%</b>

Source: <http://www.defra.gov.uk/environment/waste/producer/packaging/data.htm>

The UK recycled 61.7% and recovered 65% of its packaging waste in 2008. In 1998, these figures were 27% and 30% respectively. This increase is a significant achievement, and a key milestone in the UK's progress on packaging recycling. It is helping in the fight against climate change, saving roughly 6.4 million tonnes of CO<sub>2</sub> equivalent<sup>6</sup> from being emitted into the atmosphere.

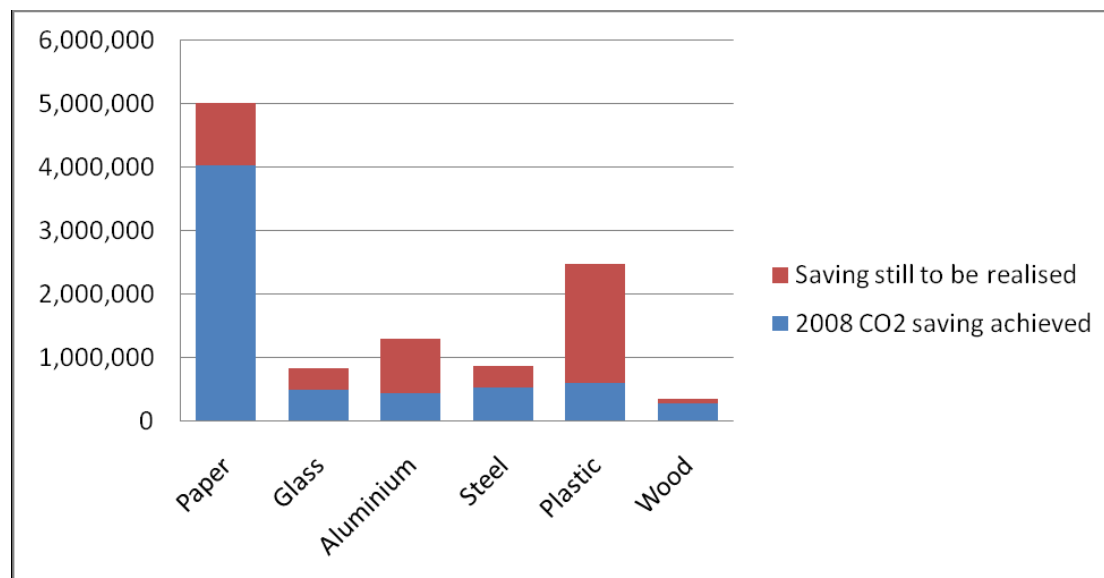
Yet, analysis within the Strategy shows that more can be achieved over the next 10 years for the benefit of consumers, businesses and the environment. Recycling reduces the need to extract virgin raw materials, which helps prevent natural resource depletion. And most recycling processes are less energy-intensive than the manufacture of virgin materials, which saves both money for businesses and greenhouse gas emissions.



Consultation on implementing the Packaging Strategy: recovery and recycling targets, funding transparency and technical changes was issued in March 2010. The consultation discussed the possibility of introducing new recovery and recycling targets for packaging waste for 2011-20 for obligated businesses.

The chart below shows the potential CO2 savings that could be made by recycling more packaging waste, based on 2008 actual recycling rates.

### Actual and potential CO2 equivalent savings from packaging recycling, 2008 tonnages (CO2eq tonnes)



Using the carbon factors listed in Annex A of the Packaging Strategy

Source: <http://www.defra.gov.uk/environment/waste/producer/packaging/data.htm>

#### 2.1.10 Waste Electrical and Electronic Equipment Directive

The aims of this Directive are to require hazardous components to be removed from Waste Electrical and Electronic Equipment (WEEE), and to reduce the amount sent to landfill by introducing recovery and recycling targets. Some types of WEEE items, such as washing machines, were already being recycled, but additional systems for recycling items such as televisions and computers needed to be provided. Member States are required to collect 4kg of electrical and electronic equipment per head of population and per year, and local authorities are required to provide facilities at household waste recycling sites to collect these items from householders. The recycling and recovery targets vary according to the material category.

UK manufacturers were required to meet the treatment and recycling costs from 2007.

WSCC currently offers a WEEE recycling service at HWRSs, and will seek to ensure any further opportunities arising from the implementation of the Directive. The campaign has led to West Sussex residents recycling an average of 11kg (about 22lbs) of WEEE per person – almost twice the national average. This recycling drive won an the Electrical and Electronic

Recycler of the Year category at the National Recycling Awards. The awards recognise the achievements of recycling and waste management projects across the country from both the public and private sectors.

This Directive currently targets household waste only.

### **2.1.11 Batteries and Accumulators Directive**

The European Commission adopted a proposal for a new Directive on Batteries in 2004. This sets targets for the collection and recycling of spent batteries, and thus reduces the disposal of batteries through the municipal waste stream. The Directive was adopted during 2006. Facilities for recycling batteries are now located at HWRSs.

This Directive currently targets household waste only.

### **2.1.12 Waste Minimisation Act 1998**

The Waste Minimisation Act enables local authorities to implement schemes to minimise the amount of household waste which is generated. However, the Act does not place an obligation on authorities to carry out such initiatives, nor does it allow councils to impose any requirements on businesses or households in their area.

This Directive currently targets household waste only.

### **2.1.13 Business Response to the Above Legislation**

Business responses to these legislative issues have been variable. Some large organisations, with a capability to make substantial savings by minimising waste, have introduced changes in business practices. SMEs feel that they have less opportunity to do so for cost as well as practical reasons, but could potentially still make savings by reviewing their materials use and waste management practices. Many do try to recycle as much as possible but often have to look for MSW outlets e.g. bring banks or make inappropriate use of HWRSs and household collections which transfers the cost to the domestic taxpayer.

## **2.2 Drivers for Change - Others**

### **2.2.1 Minerals and Waste Development Framework (MWDF)**

The County Council is required to prepare the MWDF (see Section 1.5). A formal decision was made on 15 October 2010 to suspend the preparation of the key document within the MWDF, that is, the Minerals and Waste Core Strategy. This was due to uncertainties that had arisen, including:

- the impact of the Government revoking the South East Plan;
- possible changes to the planning system arising from the Decentralisation and Localism Bill;
- the proposed national review of waste policy; and
- the need for further discussions on joint working with the South Downs National Park Authority.

The Core Strategy will play an important role in enabling the delivery of the new and improved infrastructure required to manage C&I waste in West Sussex. A new timetable for the Core Strategy will be prepared when the implications of the above issues are clearer.

### **2.2.2 Recyclate Markets**

The market place for recyclates can be global, national or local depending on the material stream and demand. The processing of recyclables might therefore be seen as a business opportunity, one that could create income and economic growth within the county.

Materials for the C&I sector are, in the main, well traded commodities. The market place ranges from global, national, regional and local (sub regional). Markets do not need to exist in the county but preparation of materials for the market is a necessity. The role of the JC&IWS is to enable materials to be recovered so that they can be sent to the appropriate market.

This Strategy and the work of Pathway to Zero Waste (PTZW) a regional body set up by the Regional Development Agency (RDA), Waste Recycling Advisory Programme (WRAP) and the Environment Agency (EA) aim to assist the delivery of appropriate supporting infrastructure. Already, the County Council, through Better Tomorrows, has been involved in investigating opportunities for the processing of organic and packaging materials from the hotel and catering sector as a result of engagement with PTZW and the EA.

Several opportunities present themselves to make further contributions in this area:

- Will engage with PTZW and neighbouring councils and materials organisations and their agents to ensure consistency of approach and to seek sharing of strategic information and delivery opportunities.
- There is opportunity to consider networking material exchanges to better effect based on the experience of the National Industrial Symbiosis Programme (NISP) who link together wastes from one organisation to be the raw material for another.
- There is also the opportunity to support and promote the work of those who are seeking to expand the range of materials that are recyclable (in terms of research, technology development and market stimulation).
- The partnership is also aware that there is public concern about the fly tipping of wastes and the poor collection and delivery of materials which are then shipped to developing nations where materials are recovered. The partners will ensure that the collection of material for recycling is done so in the optimum way, where possible, to prepare materials for the market and that if exported they will not be processed under adverse working conditions.

### **2.2.3 Sense of Responsibility**

The County Council has received third party requests to make recycling facilities available to the C&I sector. The benefits of making such provision are supported by a Defra sponsored study which estimated that businesses nationally could save an estimated £6.4 billion a year through low cost or no cost resource efficiency measures, mainly on energy and waste measures.

These demands and the findings of the study have led the partnership to review and reconsider its role and responsibilities to its business community and as a result this Strategy has been developed.

By assisting with the provision and promotion of more local services available to the C&I sector, the introduction of the JC&IWS could help to discourage fly-tipping.

### **2.2.4 Community Engagement**

Whilst the partnership has no formal powers over the treatment for C&I waste, community feedback indicates that local authorities in West Sussex should now turn their attention to facilitating, where possible, improved arrangements for more sustainable, resource efficient ways to deal with this waste.

The JC&IWS seeks to ensure that the partnership is in a position to utilise both its role and its influence to assist the business community, to reduce the use of landfill by enabling arrangements for waste prevention, reuse, recycling and recovery.

## **2.3 Waste Data & Analysis**

The estimated waste arisings in West Sussex in 2009/10 were:

- Municipal Solid Waste (MSW) – 436,000 tonnes (excluding commercial waste collected by local authorities)
- Commercial and Industrial (C&I) Waste – 716,000 tonnes
- Construction and Demolition (C&D) Waste – 1,340,000 tonnes

This was a total arising of 2.49 million. Of this 48% (a total of almost 1.2 million tonnes) was estimated to have been recycled in 2009/10, and 41% was estimated to have been landfilled. All of the MSW was either recycled or landfilled, some C&I waste was either treated or sent to thermal recovery plants, and some C&D waste used at registered exempt sites.

The estimated arisings of waste in West Sussex in 2025/26 are projected to be:

- MSW – 436,000 tonnes per year
- C&I – 767,000 tonnes per year
- C&D – 1,340,000 tonnes per year

This is a total arising of 2.54 million tonnes per year (in 2025/26), which is an increase of 50,000 tonnes over the estimated arisings in 2009/10.

The lack of yearly data on the arisings of C&I waste makes it difficult to predict future arisings using historic trends. However, the current trend identifies that:

- the total arisings of C&I waste are reducing; and
- the percentage of commercial waste arisings had increased over the last 10 years whereas the percentage of industrial waste had decreased. This trend over the last decade is likely to hold true due to the continuing shift towards a service-based economy.

All figures are from AEA Technology's Waste Forecasts for West Sussex 2010-2026 Report.

### 2.3.1 C&I Waste Composition

The table below shows the typical management of each of the categories of C&I waste.

Material	Recycled (%)	Treatment (%)	Landfill (%)	Total (%)
Chemical wastes	44	43	13	100
Metallic wastes	98	1	1	100
Non-metallic wastes	93	1	6	100
Discarded equipment	77	16	7	100
Animal & vegetable wastes	91	4	5	100
Mixed (ordinary) wastes	12	1	87	100
Common sludges	67	8	25	100
Mineral wastes	80	1	19	100

#### Typical items in each category

Category	Included wastes
Chemical wastes	Solvents, acids/alkalis, used oil, catalysts, wastes from chemical preparation, residues and sludges
Metallic wastes	Metallic wastes
Non-metallic wastes	Paper & card, glass, rubber, plastic, textiles, wood
Discarded equipment	End of life vehicles (ELVs), waste electrical and

	electronic equipment (WEEE), batteries, other discarded equipment
Animal & Vegetable wastes	Food, manure, other animal and vegetable wastes
Mixed (ordinary) wastes	Mixed waste (mainly from offices and canteens), sorting residues
Common sludges	Sludges and dredgings
Mineral wastes	Combustion residues, contaminated soils, solidified mineral wastes, other mineral wastes

The table below shows the typical options for the overall commercial and industrial waste arisings. The overall recycling rate for industrial was estimated to be 63%, and the overall recycling rate for commercial waste was estimated to be 45%. The lower overall recycling rate for commercial waste is because only 12% of the mixed waste stream was being recycled.

	Recycling	Treatment	Landfill	Total
Industrial	63	5	32	100
Commercial	45	4	51	100
<b>Total</b>	<b>51</b>	<b>5</b>	<b>44</b>	<b>100</b>

The overall recycling rate for the total C&I waste stream was 51%.

The table below shows the typical composition for the mixed waste element of commercial and industrial waste in West Sussex:

Material	Mixed waste stream for C&I waste (%)
Paper and cardboard	32
Plastic film	7
Dense plastic	8
Textiles	2
Other combustible materials	16
Glass	4
Other non-combustible	6
Food waste	13
Other organics	2
Metal	4
Household hazardous	1
WEEE	1
Fines	4
<b>Total</b>	<b>100</b>

The main components are paper & card and food waste and these are the main materials that will need to be targeted for recycling in order to increase the recycling rate for this stream.

### 2.3.2 Brew Project

WSCC alongside East Sussex County Council (ESCC) and Brighton and Hove City Council (BHCC) received a grant from Business Resource Efficiency and Waste (BREW) to enable a project to assist with the available data collection for C&I waste. By working in conjunction with ESCC and BHCC it was thought that the project could secure at least a better than average data set to make plans and forecasts. Unfortunately this was not the case and data surrounding C&I waste remains fragmented. Defra are to conduct a nationwide data survey in 2010 for publication in 2011.

## **2.4 Waste Contracts & Existing Arrangements**

### **2.4.1 Waste Collection Contracts**

C&I material recovery is dependent on the collection and treatment services to enable it to happen. At the moment such services are immature because it is costly and, in some cases, impracticable for SMEs to separate a range of materials. This can be due to limitations on the space available within a business premises to store separate bins / materials and or the perceived time it takes to set-up and maintain segregation systems. The default is that much material that is recyclable is put in one bin for disposal.

Waste companies do offer recycling services but the total cost of this, as well as disposal, is often higher than paying for one service. This may be because the volumes and tonnage are not sufficient to be cost effective. The routing of vehicles is another factor, with more rurally located businesses often finding they have to pay high collection costs to cover the transport costs involved in physically reaching them and transporting their materials away. For businesses with low levels of waste and recyclables, these costs can seem prohibitive.

WCAs have a duty to collect trade waste where requested by a business and may make a reasonable charge for this. WCAs may also offer a trade waste recycling service, operating under the same rules as commercial companies and with similar economic considerations. There is also a disincentive for some councils because the Government's targets for land filling depend on the total amount of waste collected irrespective of source. Therefore if a Council is close to its limits, it may be hesitant to offer a trade waste service if this is likely to penalise them.

Despite these difficulties, and with initial pump-priming funding from the Business Resource Efficiency and Waste (BREW) Centre, the County Council, together with the District and Borough Councils and Viridor, established a countywide trade waste recycling system and set up several trade waste reception facilities for recyclables. The JC&IWS will look to further build on the success of this award-winning scheme.

Frequently it is a lack of access to collection services or 'disposal' options and the cost of these services that are the barriers to businesses joining recycling schemes. Some businesses are aware of recycling options, but simply express little interest in pursuing them.

#### **2.4.2 Recycling & Waste Handling Contract**

Currently, by prior arrangement, it is possible for businesses to bring their recyclable and non-recyclable materials to two Transfer Stations within the County.

#### **2.4.3 Materials Resource Management Contract**

The County Council has entered into a contract with Biffa to develop a Mechanical Biological Treatment (MBT) facility (including Anaerobic Digestion (AD) as the 'biological' stage of the process) at Brookhurst Wood, near Warnham.

#### **2.4.4 Landfill Capacity**

Available landfill capacity in the county is predicted to last for 4 to 5 years. Available adjacent landfill is estimated to be 7 years in Hampshire (Hampshire County Council AMR 2008-09), 9 years in Surrey (Surrey County Council AMR 2008-09) and approximately 3 years in East Sussex and Brighton and Hove (East Sussex AMR 2008/09). Landfill capacity is increasingly difficult to find, expensive to manage and is the treatment process now least favoured as an option due to its environmental disadvantages. There will, however, be a continued but declining need for landfill in the future.



## **Section 3.0 Where Do We Want To Get To?**

### **3.1 Setting The Course – Strategic Aim**

This JC&IWS, sets out a potential direction for the partnership's leadership on C&I waste, and has already been considered by the Cabinet Members. Like the JMRMS it seeks to reduce the use of landfill by enabling arrangements for waste prevention, re-use, recycling and recovery.

The JC&IWS overall strategic aim is:

**That West Sussex becomes a resource efficient County where waste material is either prevented from occurring or is physically recovered from all sectors and reintroduced to the market as either a resource, raw material, electricity or heat.**

### **3.2 Common Aims & Principles**

The following Common Aims and Principles Policy Statement provides a clear framework for all partners of the JC&IWS:

“West Sussex County Council (WSCC) and their partner Districts and Boroughs recognise that there is a need to move towards a more resource efficient approach to managing commercial and industrial (C&I) waste within their areas to strive towards a zero waste economy. The following aims and principles are considered key to achieving this required step change:

- **Education:** Promote opportunities for education and examples of best practice within the business community in order to reduce the amount of C&I waste created in Sussex and to assist businesses in improving their financial efficiency.
- **Information:** Provide practical information to the business community to assist them in minimising resource use and achieving more resource efficient options for dealing with unavoidable wastes.
- **Re-use:** Increase the re-use of materials.
- **Recycling:** Increase composting and recycling of unavoidable wastes.
- **Recovery:** Increase the resource efficient recovery of remaining unavoidable waste.

These aims and principles have been developed to support local needs within a national and local policy framework and to support the waste hierarchy.

They should all assist in achieving the following joint aim:

**That West Sussex becomes a resource efficient County where waste material is either prevented from occurring or is physically recovered from all sectors and reintroduced to the market as either a resource, raw material, electricity or heat.**

By adopting these aims and principles, it is anticipated that a full strategy and action plan for C&I waste can be developed with a view to enabling the various Councils to define their joint and individual approaches to achieving a more resource efficient future for C&I waste."

It should be noted that these policies should not purely focus on 'chasing tonnages' but should target measures where they will provide the highest environmental benefits. This may include a focus on removing from the waste stream materials that have high-embedded carbon, or preventing biowaste from entering landfill.

### **3.3 National Objectives and Targets**

#### **National Objectives**

The Government's key objectives as currently set out in the Waste Strategy for England (2007) are to:

- decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use;
- meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020;
- increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;
- secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste; and
- get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.

#### **Targets**

The current Waste Strategy for England does not include targets for C&I waste but states that the Government will shortly be setting a new national target for the reduction of C&I waste going to landfill. It states that on the basis of the policies set out in the strategy, levels of C&I waste landfilled are expected to fall by 20% by 2010 compared to 2004.

The South East Plan (SEP) set out targets for the management of C&I waste and the diversion of C&I waste from landfill in West Sussex, however the Government has announced its intention to abolish RSS's in

the forthcoming Decentralisation and Localism Bill (see section 1.5). These targets were to be used by the County Council, as Waste Planning Authority, to identify the number of facilities required to meet the recycling, composting and treatment capacity shortfall in the County. Instead, locally specific targets will be developed and tested through the preparation of the Core Strategy of the Minerals and Waste Development Framework. These targets will then be incorporated into the JC&IWS.

### **3.4 Meeting Objectives – Common Aims & Principles**

The JC&IWS aims to meet the above national objectives as well as taking into account wider sustainable development issues important to West Sussex. Fundamentally, it aims to develop a sustainable and cost effective waste management approach. Achieving our strategic aim would:

- Enable people, businesses and local authorities to spend less money on waste management;
- Improve resource efficiency in the local economy; and
- Reduce greenhouse gas emissions and other environmental impacts.

Achieving the aim will require businesses, local authorities and the Government to work together.

Education and behaviour change will also be key to the delivery of a successful JC&IWS. The partnership will seek to work with those organisations already providing training and awareness programmes and who are focused on providing information to local businesses, such as Better Tomorrows; the West Sussex Sustainable Business Partnership; and Business Link.

The partnership will hope to stimulate behavioural change and awareness through the use the messages that can be delivered by the Community Interest Company - Better Tomorrows. It will maintain support for the West Sussex Sustainable Business Partnership to keep working with other business advisory bodies to promote C&I waste reduction and recycling as part of their overall resource efficiency work with the business community. Subject to resources the partnership will use local delivery bodies to influence the national bodies, such as Envirowise to coordinate messages. If additional resources are made available, the partnership with Better Tomorrows, will encourage local business organisations to engage with waste reduction initiatives and communicate these initiatives with their membership.

The partnership will also stimulate local social enterprises such as office furniture and electronic equipment recycling schemes which, in addition to their core business, may be seen to be part of a wider whole in bringing about behaviour change in local businesses. Commitment to investigating extending these services, through discussions with the current providers, may lead to them developing to the point where they can operate regionally and have a wide impact on reducing C&I waste levels.

The partnership will promote best practice via its business networks and its own means of communication with the householders and businesses such as the newsletter 'Connections', web based information, and direct meetings/events.

It will also be important to liaise with business organisations (such as the Chamber of Commerce, Federation of Small Businesses etc) as well as umbrella organisations to ensure that they set out to achieve high standards within their membership. There are clear cost savings to be made from good wastes management practices and this message needs to be further spread by such organisations.

### **3.4.1 Education**

The JC&IWS seeks to educate business leaders of the need to change behaviour from both a management and a strategic point of view. This Strategy considers the increasingly efficient use of material resources within the production process, sorting and separation of recoverable material thus improving a business's profitability. The strategic approach would be to push businesses to review the design of their products to incorporate recovered resources, procurement of recovered materials in a more cost effective way, perhaps via forming supply chain partnerships, and how to change the philosophy towards waste as part of the overall culture of the business.

The first step to any improvement relating to waste or resource use is to ensure that only what is needed is used. Consideration of appropriate resource use should be part of the production process and of consumer choice. Producers should consider the type, amount, and carbon and energy impacts of the materials they use at both the design and production phases. They should also inform the consumer what best to do at the end of life of the product.

Many global producers have embraced this ethic into their thinking and have made substantial improvements in all aspects of their business. It is more difficult for SMEs to make such an impact, but there can still be reduction in wastage by more careful consideration and management of material use. Organisations such as Business Link, Envirobusiness, the Sustainable Business partnerships, The Environment Centre, the Olive Consultancy, SE ReMade, and others have well developed advice on web sites and also provide direct training (often free) for businesses.

The partnership has been very successful in the reduction of municipal waste through the creation of Better Tomorrows, with a specific remit to advise householders on how to reduce their waste. Consideration is being given to extending this experience and service to SMEs as well as using it to harness the various delivery bodies in the County towards a comprehensive coverage of education and advice.

The partners wish to see a reduction in volumes arising from the C&I sector, taking account of industrial activity and the growth in the local

economy. Waste prevention should be the first consideration in implementation of this Strategy.

### **3.4.2 Information**

The JC&IWS aims to inform and educate SMEs of their responsibilities under the Duty of Care regulations, and therefore additional support could help businesses to avoid prosecution for non-compliance.

A key area to review, is the varying ways by which businesses (particularly SMEs) may be assisted in assessing their waste to enable them to make more informed sustainable choices. This will mean a number of the delivery partners working cohesively together to liaise with businesses directly. This provision of information through face-to-face advice and support will be a key role during the first year of adopting this Strategy. This information could also be provided through workshops or briefing sessions.

The West Sussex Sustainable Business Partnership (WSSBP) already holds a regularly updated 'Recyclers List', which comprises of known companies that are able to offer recycling services within the West Sussex area. This list is relatively low cost to maintain, easily accessible to businesses and very effective in providing the level of support businesses require.

### **3.4.3 Re-use**

The action plan will explore opportunities for re-use. A potential tool to aid the re-use of C&I waste could be through development of an online 'Swap-Shop'.

The partners will take every opportunity to lobby Government to examine the possibility of trialling take-back schemes such as refillable bottles.

### **3.4.4 Recycling**

The new Materials Recycling Facility (MRF) at Ford currently has some spare capacity. There is potential to offer this capacity to process C&I material for the medium term, subject to current planning permission, particularly relating to any potential increase in vehicle movements.

The partners will also consider what opportunities exist for utilising spare capacity within the rest of the existing MSW infrastructure, subject to any necessary planning permission and the need to offset costs.

### **3.4.5 Recovery**

The Warnham Mechanical Biological Treatment (MBT) facility will open in 2013/14 with some spare capacity initially, and again the opportunity may exist to offer this to deal with C&I waste for the medium term, subject to current planning permission, as above.

This trend of utilising spare capacity is likely to continue as all authorities increase recycling and composting rates.

## **Section 4.0 What Things Do We Need To Do To Get There?**

### **4.1 Following Common Aims & Principles**

In order to deliver the common aims and principles, the partnership has established an action plan focusing on the next 3 years objectives, whilst identifying some longer-term aspirations. The Action Plan is attached as Appendix A.

## **Section 5.0 Implementing the Necessary Actions**

### **5.1 Resource Implications**

The initial three years actions within the JC&IWS will be delivered within the scope of the existing resources committed to waste management. Resources will be reviewed in line with the performance management framework, to support any policy developments.

## **Section 6.0 Keeping The Programme on Track**

### **6.1 Risk Management**

Currently, the County Council does not have any obligations or statutory duties to reduce the amount of C&I waste being sent to landfill. However, this emphasis may change under the current review of waste policy.

The review of waste policy and the revised EU Waste Framework Directive suggest that targets could possibly be established at either a national or local level in the near future.

### **6.2 Performance Management**

This Strategy is intended to cover until 2035, with provision for regular monitoring and 3 yearly reviews. Should there be a significant change in legislation or national waste policy, the Strategy will be reviewed at that time.

The action plan will become part of the core business plan for each Local Authority.

**Delivery Partners**

A&WS	Adur and Worthing Services This is the amalgamation of the previously separate WCAs of Adur and Worthing. A waste collection service is provided by a DSO arrangement.
ADC	Arun District Council With the WCA responsibilities for Arun District. Waste collection services are provided by a contract with Verdant, this contract is due for review in 2016 (runs to 31 <sup>st</sup> January 2017).
Biffa	Materials Resource Management Contractor 2010-2035.
BL	Business Link is a free business advice and support service.
BT	Better Tomorrows A community interest company delivering innovative and collaborative waste reduction, reuse and recycling programmes across the municipal and commercial waste streams in West Sussex.
CBC	Crawley Borough Council With the WCA responsibilities for Crawley Borough. Waste collection services are provided by a contract with Veolia, this contract is due for review in 2012.
CDC	Chichester District Council With the WCA responsibilities for Chichester District. A waste collection service is provided by a DSO arrangement.
DSO	Direct Service Organisation This is a waste collection service owned and operated in-house by the Local Authority for whose area it covers.
EA	Environment Agency An Executive Non-departmental Public Body responsible to the Secretary of State for Environment, Food and Rural Affairs and an Assembly Sponsored Public Body responsible to the National Assembly for Wales. Duties include the regulation and permitting of waste sites.
HDC	Horsham District Council With the WCA responsibilities for Horsham District. A waste collection service is provided by a DSO arrangement.
HWRS	Household Waste Recycling Site These are the 11 sites around West Sussex where members of the public may deposit their waste for recycling and disposal.
IAWG	Inter Authority Waste Group A quarterly meeting of the senior waste officer(s) and their

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	Cabinet Member from each of the WCAs and the WDA.
MSDC	Mid Sussex District Council With the WCA responsibilities for Mid Sussex District. Waste collection services are provided by a contract with SERCO.
Olus	Olus holds a contract with Viridor to compost green waste from HWRSs and a further contract with HDC to compost their collected green household waste. Green and wood waste materials are composted to the British Quality Standard PAS100 and marketed to a variety of end users.
SERCO	To be requested from SERCO – meeting with SERCO to be requested once MSDC give go-ahead to approach them.
SWOG	Strategic Waste Officers Group A monthly meeting of senior waste managers from each of the WCAs, the WDA and the EA.
Veolia	To be requested from Veolia.
Verdant	To be requested from Verdant – joint meeting held with Verdant, WSCC and ADC
Viridor	Recycling and Handling Contractor 2004-2029
WCA	Waste Collection Authority The District and Borough Councils are responsible for collecting municipal waste in their area. Some District/Borough Councils also collect some commercial and industrial waste.
WDA	Waste Disposal Authority With the statutory duty to make arrangements for the disposal of wastes collected by WCAs and to provide Household Waste Recycling sites.
WIGEA	Waste Initiative Group – Education and Awareness
WPA	Waste Planning Authority With the statutory duty to ensure that sufficient provision is made for the management of all wastes in West Sussex. This includes the preparation of the statutory Minerals and Waste Development Framework, determining waste related planning applications and ensuring ongoing compliance with waste related planning permissions.
WPAs	Waste Prevention Advisors Trained volunteers from the community, with an interest in assisting others to reduce waste.
WRA	Waste Regulation Authority See EA (Environment Agency) above.



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WSSC	West Sussex County Council The Authority with WDA and WPA responsibilities for the whole of West Sussex.
WSSBP	West Sussex Sustainable Business Partnership The WSSBP was created in 1998 to help businesses make savings through better resource efficiency whilst ensuring they operate profitably and competitively in a sustainable manner.