

15 December 2005

Kirstie Macfarlane  
Scottish Executive  
Environment and Rural Affairs Division  
SEPA Sponsorship and Waste Division  
Area 1-J (North)  
Victoria Quay  
Edinburgh  
EH6 6QQ

Dear Ms Macfarlane,

## **CONSULTATION ON THE SUSTAINABLE MANAGEMENT OF WASTE FROM BUSINESS & PUBLIC SECTOR ORGANISATIONS IN SCOTLAND**

On behalf of the Scottish Food and Drink Federation (SFDF) I would like to thank you for the opportunity to comment on the aforementioned consultation.

### **Background**

As you will be aware, SFDF represents the common interests of the food and drink manufacturing industry. We work to improve the environment in which the individual companies who make up the industry operate: be it legislative, economic, social or political. In so doing, we aim to help maximise the competitiveness and profitability of the industry.

59,300 people are employed in the food and drink sector in Scotland (54,000 in food industry alone) – some 11.8% of total British food and drink sector employees. The industry in Scotland also accounts for annual sales of around £4.2 billion (exc. whisky).

### **Scottish Food Chain Group**

Due to the importance of this issue, SFDF has been actively involved in promoting sustainable waste management to our members along with the partner organisations of the Scottish Food Chain Group. I have provided an overview of the SFCG work currently being undertaken below.

The group consists of representatives of SFDF, the National Farmers Union Scotland, the British Hospitality Association, the Scottish Grocers Federation, the Scottish Retail Consortium and the Sea Fish Industry Authority and promotes regular dialogue along the food chain as well as providing a mechanism for collaboration on issues of common interest. One of the key initiatives of the SFCG is the development of a Strategic Framework for Action on Waste, working in partnership with Envirowise. The initiative consists of a research project that seeks to map waste streams (and their impacts) across the food chain.

Ecodyn (the organisation co-ordinating the project on behalf of the Scottish Food Chain Group and Envirowise) are currently interviewing companies from the manufacturing, food service and retail sectors with a survey that looks at areas such as water and effluent, packaging, solid and hazardous waste and energy. Data will also be generated from a series of site visits to companies.

It is the Scottish Food Chain Group's intention to use the outputs of the research project to inform the structure and content of a programme of workshop / training based events on key waste minimisation / resource efficiency issues. It is also hoped that the research findings and subsequent events can be used to provide practical advice to companies on waste reduction and identify cost savings to the food and drink industry, which is consistent with the broad thrust of the Scottish Executive's commercial waste policy towards waste prevention.

As part of the programme of events, the Scottish Food Chain Group recently hosted a seminar on the Animal By-Products Regulations and the issue of former food stuffs. As you may be aware, this seminar featured presentations from expert authorities including Sheila Voas (Veterinary Advisor, Scottish Executive) and Dr Peter Olsen (Senior Policy Officer, SEPA).

### **Comments**

SFDF would urge the Scottish Executive to take a strategic approach to the Sustainable Management of Commercial and Industrial Waste in Scotland. Such an approach is necessary in order to map the current infrastructure of waste management / treatment facilities across the whole of Scotland so that the gaps in provision can be identified. The consultation acknowledges that more infrastructure will need to be provided in order to move commercial and industrial waste away from landfill. At present, there is a general lack of cost effective, viable alternatives that are available to business in Scotland. By adopting a strategic approach it will allow the Scottish Executive to identify where provision can be improved and how best this can be achieved. Through working with SEPA, local authorities and the commercial waste management sector, the Scottish Executive can act as a driver to ensure that this improved infrastructure is delivered which provides cost effective alternatives to the industry in Scotland.

I have provided comments on behalf of SFDF in response to the consultation questions below and trust that these will be taken into consideration. If you require further input or comments please do not hesitate to contact me.

Yours sincerely,

**Steven Birrell**  
**Executive**

# **SFDF RESPONSE TO SCOTTISH EXECUTIVE CONSULTATION: SUSTAINABLE MANAGEMENT OF WASTE FROM BUSINESS AND PUBLIC SECTOR ORGANISATIONS IN SCOTLAND**

## **Section 1: Introduction**

- **Where new waste treatment facilities are required, the Scottish Executive must ensure that the land-use planning system delivers fair decisions on where these should be sited**
- **The Scottish Executive will provide better information for businesses on the recycling options open to them**
- **The Scottish Executive does not intend to dedicate long term significant financial resources to this area [commercial and industrial waste], in the way that we have for domestic waste.**

SFDF welcomes the commitment to ensuring the needs of the economy and Scottish businesses are considered when decisions are taken on the location of new treatment facilities. The location of waste management facilities is a key factor for companies when determining whether or not a service is viable. In parts of the country, such as the North-east, there is a severe lack of recycling facilities available to companies. The additional cost of transporting waste for recycling can be prohibitive for companies in these locations, particularly SMEs.

If the amount of waste being disposed of to landfill is to decrease, it is vital that efforts are taken to develop the waste management infrastructure across Scotland so that companies have a range of options available to them. However, it is also important to note that these options must be cost effective and that if they are more expensive than what companies incur at present, it is unlikely to increase the uptake of alternative options of waste treatment / disposal. The commitment to providing better information to companies on the options available to them is also welcomed. It is important however, that this information provides companies with a comprehensive account of the all options available for waste treatment and disposal.

The consultation notes that the Scottish Executive does not intend to dedicate long term significant resources to addressing the issue of commercial and industrial waste. SFDF would recommend that the Scottish Executive considers providing incentives to encourage the commercial waste management sector to invest in new facilities. It has been suggested that the start-up costs associated with facilities such as In-Vessel Composting plants can be considerable and therefore financial assistance in the form of grants or low interest loans may encourage companies to invest in new facilities.

### **Question 2: “Do consultees consider there is more that SEPA and the Scottish Executive could do to collect data in relation to the amount of commercial and industrial waste arisings?”**

The lack of data on waste streams was one of the motivating factors for the Scottish Food Chain Group’s decision to undertake the research project outlined above. Generating the data was considered to be an essential first step that would allow the group to identify and understand the key waste minimisation and resource efficiency issues with a view to providing solutions to the industry.

SFDF would welcome any work from SEPA that looks to develop comprehensive data on waste streams in the food and drink industry in Scotland. SEPA representatives have been made aware of the SFCG project and meetings have taken place to ascertain how the work of both organisations can be developed further. There is clearly a role for both industry, via the SFCG and SEPA in generating data and mapping waste streams but it is important that there is on-going dialogue between both organisations to improve the quality of the work being carried out and to avoid duplication.

A SEPA initiative that seeks to map the wider commercial and industrial waste outputs across Scotland would be beneficial. It would generate data that could be used to demonstrate to waste management companies the level of demand that exists for waste management technologies and may encourage them to invest in new facilities.

In response to part b) of Question 2, there may be a role for waste contractors in providing detailed information on waste types that would assist SEPA in this type of study. This could be done on a confidential basis so that individual waste producers are not identified. Waste contractors will have accurate records of waste quantities and types collected from business and indeed some currently provide waste tonnage figures to their customers. Contractors may be in a position to provide information on waste quantities and also the types of waste – cardboard, plastic, etc.

**Question 3a: Are the potential barriers for SMEs achieving more sustainable waste management, outlined in paragraph 2.04 above, accurate?**

The summary of key issues provides an accurate assessment of some of the barriers facing SMEs in achieving more sustainable waste management. In particular, the problems of mixed waste streams and a lack of local recycling facilities are cited as key concerns of the food and drink manufacturing industry.

**Question 3c: What action can be taken to tackle these barriers**

The consultation rightly recognises that in order to move commercial and industrial waste away from landfill, more infrastructure will need to be provided to ensure that recycling/composting or other waste treatment facilities are available to industry. SFDF believes that this is the key barrier that needs to be overcome. As noted previously, the facilities also need to be cost effective to industry if they are to be viewed as viable alternatives to landfill.

In areas of the country where there is a distinct lack of alternative facilities available, action needs to be taken to ensure that businesses in these locations are not unfairly disadvantaged and incur additional costs such as those involved with transporting waste. By identifying the infrastructure needs and problem areas, the Scottish Executive could work with the commercial waste management sector to develop alternative options to landfill.

The Scottish Executive considers that when promoting waste management services, local authorities should promote services offered by the private and voluntary sectors but also its own services. SFDF would urge the Executive to adopt a strategic approach that involves working with the local authorities to identify infrastructure needs and also to develop the additional facilities required that could be offered as a commercial service to industry. The consultation advises that the local authorities would be expected to recover costs from the

waste producers rather than from Government but financial assistance from the Scottish Executive may be necessary in order to develop existing local authority facilities or establish new ones in the first instance. Providing similar assistance to waste management companies may also be beneficial in encouraging them to invest in new developments.

**Question 4a: Can local authorities do more to provide advice to businesses on available local services for recycling and waste prevention**

Any initiative which increases the awareness of options available should be welcomed, provided it is not a duplication of information being provided by another source or organisation. The focus on waste management should be on developing practical, viable facilities and ensuring that industry is made fully aware of the options available.

**Question 5: Could trade associations do more to encourage businesses to address waste managements?**

As noted in the covering letter, SFDF is an active participant in the Scottish Food Chain Group's work to develop a Strategic Framework for Action on Waste. The outcomes of the research project will be used to generate four interactive workshops that will give practical advice on waste minimisation and resource efficiency.

**Question 6: Is it practical for businesses to share collection and storage facilities to encourage recycling**

Such a proposal may be a practical and cost effective solution for companies but much would depend on both the location of the business and the waste types. If central collection points can be established in areas across Scotland, this may be cost effective to recycle waste streams of smaller quantities.

**Question 8a: Is there any more the Scottish Executive and SEPA or other agencies could be doing in relation to the provision of infrastructure to deal with commercial and industrial waste?**

In his presentation to the SFCG Animal By-Products Seminar, Dr Olsen advised delegates of the options for disposal of animal by-products and former food stuffs. He also advised of the current infrastructure in Scotland with regards to In-Vessel Composting plants, Anaerobic Digestion plants, Mechanical & Biological Treatment and Thermal Treatment facilities.

With regards to In-Vessel Composting plants, it was noted that of the 12 facilities in Scotland not all have been approved for treating Animal By-Products and that accreditation can be a time consuming process. Any action which reduces the length of time associated with the accreditation process as well as the overall bureaucratic burden to waste management providers should be encouraged. SFDF welcomes reports that there would be a review of the current regulations with a view to easing the regulatory burden.

Although several are planned, there are currently no Mechanical & Biological Treatments in Scotland. Such facilities and indeed all of those listed above cannot be developed overnight and therefore if businesses are to consider alternative disposal / treatment options other than landfill, it is vital that these facilities are in place as quickly as possible. As noted elsewhere in this response, the Scottish Executive should consider providing start up assistance to companies interested in developing new plants.

If new facilities which are cost-effective are made available to industry, then there is evidence to suggest that these will be considered. We were recently advised of an In-Vessel composting plant currently being developed that is already pre-booked to capacity.

By adopting a strategic, nationwide approach, the Scottish Executive can identify infrastructure needs throughout Scotland and act as a driver, working with local authorities and the commercial waste management sector, towards fulfilling these needs and developing facilities across the country that can be utilised by industry.

**Question 8b: Is there any more the Scottish Executive and SEPA or other Government agencies could be doing to take account of potential synergies between domestic waste and commercial industrial waste**

The Scottish Industrial Symbiosis Programme (SISP) currently looks to identify possible synergies between different industry sectors. Extending this programme to include the domestic waste sector may result in a greater number of potential synergies being identified.

**Question 11: Are voluntary agreements a way of reducing waste arisings' or reducing waste going to landfill or encouraging recycling?**

Voluntary agreements are unlikely to be effective. There needs to be a suitable driver to encourage companies to reduce waste going to landfill and ultimately, this is the provision of better recycling facilities or other waste treatment options.

**Question 13: Do consultees believe that it is feasible to introduce bans on the landfill disposal of certain materials?**

The consultation identifies the considerable problems that could occur as a result of a ban and SFDF would not encourage this course of action. It would be more productive to focus resources on developing the waste management infrastructure in Scotland so that viable alternatives to landfill can be provided.

## The Food and Drink Manufacturing Industry

The Scottish Food and Drink Federation (SFDF) represents the food and drink manufacturing industry in Scotland.

The food and drink manufacturing industry in Scotland has a gross output of around £6.5bn and accounts for circa £2.5bn of total UK exports and 11.8% of the UK sector workforce.

SFDF is a devolved division of the Food and Drink Federation (FDF), the voice of the UK food and drink manufacturing industry. As the largest manufacturing sector in the UK, food and drink manufacturers employ over 500,000 people and have a combined annual turnover of in excess of £69bn. UK food and drink exports in 2003 were almost £10bn.

The following organisations are members of the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BCCCA	Biscuit, Cake, Chocolate and Confectionery Association
BOBMA	British Oats & Barley Millers Association
BSIA	British Starch Industry Association
CFA	Chilled Food Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers Association
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
FF	Frozen Food Group
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
LDT	Lifestyle and Dietary Trends Group
MSA	Margarine and Spreads Association
MG	Meat Group
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
OHG	Out of Home Group
ORG	Organics Food and Drink Manufacturers' Group
SB	Sugar Bureau
SG	Seafood Group
SIBA	Society of Independent Brewers
SMA	Salt Manufacturers' Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTA	UK Tea Association
VEG	Vegetarian and Meat Free Industry Group