## ****Call for Evidence to support the near elimination of biodegradable waste to landfill: Questions****

**May 2023**

**When responding to questions without a free text box, please put a cross against your answer. Where there is a free text box, please use this to give us as much information as you can. Where possible, please provide links to supporting evidence or data. Where data is numerical, i.e. data related to the composition of mixed wastes, please can you share this in a spreadsheet (.xlsm, .xlsx, or .csv format) in as granular data as possible. For example, if you own or operate more than one landfill site and you are willing to do so, please do share data for each site.**

**Please submit all data on an annual basis where possible, including the year the data are drawn from. If you are able to, please include detail on the methodology, including granularity used and any limitations on the data.**

**Please return your completed response to** [residualwaste@defra.gov.uk](mailto:residualwaste@defra.gov.uk)

## ****About You****

1. Would you like your response to be confidential? Please refer to the information on confidentiality and data protection at page 5 of the CfE document.

Yes

No

1. If you have answered ‘Yes’ above, please give your reason.

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1. What is your name?

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1. What is your email address?

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1. Which of the options below best describes you? Please tick only one option. If multiple categories apply to you, please choose the one which best describes you and which you are representing in your response. (Required)

* Academic or research
* Business representative organisation/trade body
* Charity or social enterprise
* Community group
* Consultancy
* Distributor
* Exporter
* Individual
* Landfill operator
* Local government

Unitary Authority

Waste Collection Authority

Waste Disposal Authority

Other local government body

* Non-governmental organisation
* Product designer/manufacturer / pack filler
* Retailer including online marketplace
* Waste management company
* Other (please provide details)

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1. If you are responding on behalf of an organisation, what is its name?

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## Landfill Allowance Trading Scheme

1. Does your organisation/authority have in place an active policy to minimise or avoid the landfilling of biodegradable waste?

Yes

No

Not applicable

If you are happy to do so, please can you provide a copy, or details of this policy.

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1. If you do actively divert biodegradable waste from landfill, how is this waste treated?

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1. If you do not have an active policy, does your organisation/authority have any plans to implement policies or actions to divert biodegradable waste from landfill?

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## Residual waste treatment

1. Do you manage biodegradable waste?

Yes

No

If your answer is no, please go to the next section entitled ‘The mixed waste codes’.

1. If you do manage biodegradable waste, what proportion (%) of this waste do you usually send to:

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|  | 0-20% | 21-40% | 41-60% | 61-80% | 81-100% |
| Incineration with energy recovery |  |  |  |  |  |
| Incineration without energy recovery |  |  |  |  |  |
| Landfill |  |  |  |  |  |
| Anaerobic Digestion/composting |  |  |  |  |  |
| Other treatment (please state below) |  |  |  |  |  |
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1. If applicable, can you describe any factors or issues that influence your choice of biodegradable waste disposal routes?

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1. If you do not routinely send your waste to landfill, how often do you use landfill as a disposal method where there is no alternative option?

Never

Sometimes (less than monthly, but at least once a year)

Often (monthly)

Very often (more than once a month)

1. What are the circumstances in which you have used or would consider using landfill as a contingency or emergency disposal option?

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1. If there are seasonal fluctuations, including seasonal novelty wastes, that impact your waste disposal options, do you have any evidence as to the quantities and composition of these wastes, as well as how they are treated and coded before being disposed of in landfill?

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1. If you manage biodegradable waste, how often do you send waste for inter-UK disposal in landfill (i.e. from England to Scotland, Wales, or Northern Ireland)?

Never

Sometimes (less than monthly, but at least once a year)

Often (monthly)

Very often (more than once a month)

1. Are there specific circumstances that influence decisions to send biodegradable waste for inter-UK disposal?

Lack of available treatment capacity in England

Existing contracts

Cost effectiveness

Other (please state)

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## The mixed waste codes

1. Do you have any evidence or data that details the composition of the 20 03 01 and 19 12 12 waste codes dating from 2011 onwards/that is less than 10 years old?

Yes

No

If yes, please share the evidence and/or data

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1. Do you have a view on why significantly more 19 12 12 waste is sent to landfill than EfW?

Yes

No

Please provide information or evidence to support your view.

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1. Do you know of any innovations, solutions or ideas as to how mixed wastes could be treated or sorted, or existing sorting improved, to remove biodegradable material from these waste streams?

Yes

No

If yes, please share details, including any information as to why these innovations or solutions are not already widely adopted if applicable.

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## Waste Fines

1. Do you have any evidence or data that details the composition and sources of the waste code 19 10 04: fluff-light fraction and dust from shredding of metal-containing wastes?

Yes

No

If yes, please share the evidence and/or data

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1. Do you support the establishment of a specific waste code(s) for waste fines?

Yes

No

Please explain your view, including evidence or data to support your view if available.

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1. Do you have any evidence or data to support or oppose the use of separately engineered cells for the landfilling of waste fines only?

Yes

No

If yes, please share the evidence and/or data

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1. Do you have any evidence or data to support or oppose the introduction of waste acceptance criteria that sets stringent controls on the amount of sulphur bearing waste present in waste fines?

Yes

No

If yes, please share the evidence and/or data

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## Identification of biodegradable waste and enforcement of policies

1. Would you recommend a particular method by which biodegradable waste could be identified prior to disposal at landfill?

**Please share any evidence or data that supports your recommendation**

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1. Are there, in your opinion, any avoidant behaviours or unintended consequences that may occur as a result of using a particular method of identifying biodegradable waste?

**Please share any evidence or data that supports your view**

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## Municipal and non-municipal wastes received at landfill

**Municipal waste**

1. What are the barriers to using alternative treatments for the materials shown in Table 1 of the CfE document other than landfill?

**Please share any evidence or data that explains your view.**

20 03 07 Bulky waste

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19 05 03 Off-specification compost

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20 02 01 Biodegradable waste

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20 03 03 Street cleaning residues

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20 01 08 Biodegradable kitchen and canteen waste

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20 01 38 Separately collected wood

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19 12 07 Wood from mechanical treatment

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19 12 10 Combustible waste (refuse derived fuel)

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1. Do you have a view on how government could help support alternative treatments for this waste?

Yes

No

If yes, please share the evidence and/or data

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1. Do you have any evidence or data that can help identify the materials and sources of the waste codes shown in Table 1 of the CfE document that denote ‘biodegradable waste’ and ‘Off-specification compost’?

Yes

No

If yes, please share the evidence and/or data

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## Bulky waste

1. Do you have any evidence or data on how much non-POPs containing biodegradable bulky waste is sent for disposal in landfill?

Yes

No

If yes, please share the evidence and/or data

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1. How can government support the movement of these materials for treatment further up the waste hierarchy?

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## Non-municipal waste

1. Do you have any views, evidence or data that explains why the materials shown in Table 2 of the CfE document are sent to landfill as opposed to alternative treatment higher up the waste hierarchy?

Food effluent and biodegradable industrial sludges

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Non-inert fines

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Mixed residual waste

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Miscellaneous combustible

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Commercial and industrial paper and card

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Commercial/industrial food; abattoir waste

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1. How can government support the movement of these materials for treatment further up the waste hierarchy?

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1. Do you have any evidence or data that details the composition of materials within each category of waste received at landfill as listed above and their origins/sources?

Yes

No

If yes, please share the evidence and/or data

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1. Do you have any evidence or data that details the composition of the mixed non-municipal waste code:

19 02 03 – premixed waste composed only of non-hazardous waste

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19 08 01 – Screenings

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1. Do you have any evidence or data that details the origins/sources of these two waste codes?

Yes

No

If yes, please share the evidence and/or data

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## The five key biodegradable materials recommended for elimination from landfill by the Climate Change Committee

1. Are you aware of any barriers to expanding the list of separately collected wastes that are prohibited from disposal at landfill (or incineration) without some form of treatment process to include wood, card, textiles, food, or garden waste?

Yes

No

Please explain your answer.

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1. In addition to the materials detailed in Q37, are there any other potentially recyclable wastes which, when separately collected, could be prohibited from being sent to landfill (or incineration) without some form of treatment process?

Yes

No

If so, please provide any evidence to support this, including details of alternative treatment of these materials

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## Textiles municipal waste

1. Which of the two mixed waste codes (20 03 01 and 19 12 12) are most household and commercial municipal textiles landfilled under?

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1. For textiles recorded under the 19 12 12 waste code, where does this usually come from, i.e., a Household Waste Recycling Centre (HWRC), or a Materials Recovery Facility (MRF)?

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1. Can you provide any data on the biodegradable composition of textiles in the two mixed waste codes?

Yes

No

If yes, please share the data

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1. Based on your experience, what is the general quality of textiles found in these two mixed waste codes? If you find there is a mix of quality, please detail a percentage against each category.

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|  | 0-20% | 21-40% | 41-60% | 61-80% | 81-100% |
| Very poor quality and contaminated – unusable |  |  |  |  |  |
| Poor quality but not contaminated – in need of repair |  |  |  |  |  |
| No view |  |  |  |  |  |
| Good quality – usable but showing signs of wear/use |  |  |  |  |  |
| Very good quality – like new |  |  |  |  |  |

1. Is there any difference, in your experience, between the quality and type of household and commercial municipal textiles waste?

Yes

No

Please explain your view

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1. Do you have any suggestions for incentives government could introduce to divert textiles, particularly biodegradable textiles, from landfill and for treatment that offers better environmental outcomes in accordance with the waste hierarchy?

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1. Should businesses be required to present textiles waste separately for collection?

Yes

No

Please explain your answer

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1. In your experience, what would be the opportunities and difficulties associated with this?

Do you have any evidence to support your response?

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## Interaction with other waste policies

1. Based on your perspective, to what extent do you think that the government’s committed policies, taken collectively, will achieve the near elimination of biodegradable waste to landfill?

* Not at all (no change in current situation)
* Somewhat (will divert some (less than half) biodegradable waste going to landfill, but not all)
* Will ensure that a significant majority (more than half) of biodegradable waste, for which there are alternative treatment options, is diverted from landfill
* Completely (will divert nearly all (more than 90%) biodegradable waste, for which there are alternative treatment options, from landfill)

Please explain your view

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1. Do you have a view on alternative bio-recycling routes for the diverted biodegradable waste other than anaerobic digestion and composting in line with the government’s priority uses for biomass?

Yes

No

If yes, can you provide evidence to support your view?

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1. Are there any instruments you could suggest that would be effective in eliminating biodegradable waste to landfill?

Yes

No

If yes, please can you explain your thinking, including what financial mechanism would be appropriate and how this could work

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## Timing of policies to eliminate biodegradable waste to landfill

1. Do you have any thoughts or evidence as to how policy interventions could be sequenced so as to achieve the near elimination of biodegradable waste to landfill?

* Focus on municipal waste only
* Focus initially on municipal waste before expanding policies to non-municipal waste
* Focus on non-municipal wastes only
* Focus on all biodegradable waste
* Target specific wastes (municipal and non-municipal) now that can be diverted to alternative treatment
* Other

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Please explain your answer

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1. Having considered the timing of other policies, are there circumstances that may arise as a result of interaction with these policies that you would like us to be alert to?

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1. Notwithstanding your response to Question 50 above, in achieving the near elimination of biodegradable waste to landfill, do you have any evidence or thoughts of materials or waste codes that could be targeted before others, or should all biodegradable municipal waste be targeted at the same time?

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1. Are there materials that should be considered at a later stage or for exemption because there is no possible current or likely future alternative means of disposal for that waste?

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1. Are you aware of any barriers to bringing forward implementation of policies to achieve the near elimination of biodegradable waste to 2026, taking account of necessary lead in times to prepare the sector?

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1. Do you have a view as to whether we can and should seek to align biodegradable waste to landfill policy scope, timing and implementation in England to those being implemented across the UK?

Yes

No

If yes, please explain your view and provide evidence and data if available to support your reasoning.

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## Waste Infrastructure

1. How can government support the development of infrastructure required to manage biodegradable waste diverted from landfill?

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1. How do you consider infrastructure development might impact on the potential phasing in of policies to eliminate biodegradable waste to landfill?

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1. Do you have a view on how government could support the prevention of biodegradable waste from arising in the first place?

Yes

No

If yes, please explain your answer

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## Soils to landfill

1. Do you agree that soils and mineral wastes are excluded from the scope of policies to achieve the near elimination of biodegradable waste to landfill (with other cross-government policies focussed on the prevention and reuse of soils and mineral wastes, where appropriate)?

Agree

Disagree

Please share your views and any evidence or data that supports your reasoning.

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## Cost of achieving the near elimination of biodegradable waste to landfill

1. Are you aware of any potential costs that may arise as a result of the near elimination of biodegradable waste to landfill that should be taken into account?

Yes

No

If available, could you provide evidence to support your answer?

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1. Do you envisage any unintended consequences that the government should seek to avoid when developing policies to achieve the near elimination of biodegradable waste being sent to landfill?

Yes

No

If yes, please explain your answer

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## Any additional information of views to share

1. If you hold any evidence, data, views, or thoughts outside of direct requests for evidence, data and views contained in this document that you believe will help us in our ambition to achieve the near elimination of biodegradable waste to landfill, please add this here.

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## Supplementary section: The future of landfill

1. Would you be interested in taking part in any conversations around the future role of landfill and other topics relevant to landfill policy?

Yes

No

If your answer is yes, we will use the contact details provided by you when replying to this consultation.