

INSTITUTE for ZERO WASTE in AFRICA

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For Kind Attention:

Jane Richards
Policy Advisor
Waste Strategy Unit
Welsh Assembly Government

10 July 2009

Dear Ms. Richards

Please be assured that the effort by the Welsh government in choosing a Zero Waste future is warmly welcomed by our Institute – however, we believe that the policy needs re-working in some key areas, to allow your government to achieve their stated objectives.

Please find (below) our comments, critique and suggestions in this regard. Please do not hesitate in contacting me for further information or clarity.

Kind regards

Muna Lakhani
National Co-ordinator

Comments by the Institute for Zero Waste in Africa – South Africa – on the Welsh document “Towards Zero Waste – One Wales: One Planet – a consultation on a new waste strategy for Wales – April 2009”

Ministerial foreword:

The timelines for the targets are too conservative, and need re-focussing. The steps must happen SIMULTANEOUSLY, as building a “business as usual” recycling economy, as opposed to a materials based system, will delay and possibly fatally wound a ZW economy process.

The fastest way to change behaviour is not to spend fortunes on educating people – do you educate 10 million individuals, and hope they change, or change the production and packaging processes of 20 companies? Worldwide, it is shown that without Extended Producer Responsibility based on tight legislation and enforcement, means you WILL fail.

We believe that the Minister is keen on Wales being responsible for their “Earthshare” – this is highly commended, and is encouraged, as we Africans are notorious for under utilising our Earthshare. However, it is clear by supporting both the destruction of resources through incineration and other thermal treatments, and by not implementing robust Extended Producer Responsibility, the “Earthshare” of Wales will continue to be an unjust one.

Your achievements to date:

Unfortunately, all are focussed on end of pipe – that will never lead to any substantial reduction of waste volumes, nor of toxicity. The requirement to get to Zero Waste is to focus on source – i.e. design and manufacture of waste – remember, all waste is deliberately made!

Your definition of Sustainable Development:

While a selective quote from Gro Harlem Bruntland, what she really said was:

"Fundamentally, sustainable development is a notion of **discipline**. It means humanity must ensure that meeting present needs does not compromise the ability of future generations to meet their needs." My emphasis – it is the notion of discipline that is missing from most attempts to reach Zero Waste, including this one.

Ecological footprinting:

Do ensure that the way this is measured is ALSO your impact elsewhere in the world – the Sustainability Index showed Scandinavian countries to be the most sustainable within their borders, but their global impact made them losers – countries like the Democratic Republic of Congo and Mozambique, are some of the few countries living within their physical footprint – i.e. all their needs are supplied from within their borders. That would be a successful move on footprinting, rather than the generic 1.88 hectares per person – is Wales physically large enough to allow that for each Welsh person? Or will some / most of that be external?

Under the strategy (P 11), the endpoint must be nothing to landfill or incineration – that sets the bar, or else you will have a moving target, meaning you can possibly never get there!

Under Tackling Climate Change, it is also useful to include emission during use – i.e. all electrical appliances are responsible for emissions through use of electricity, for example.

(Pity the words “waste management” are still there – it implies that you will never get to Zero Waste – no waste to manage!)

A general statement:

While not spelt out in detail, merely hinted at - agriculture and land use, for example, but nothing about changing consumption patterns – depending on whose figures you use, meat production generates between 18% and 40% of all GHG's – but will people be asked to eat less meat?

Approach – page 14

A critical omission – waste AVOIDANCE - once one has proven that waste cannot be avoided completely (can happen more often than one would think!) then one should move down the hierarchy – minimisation etc..

Huge problem:

“high efficiency energy from waste plants for residual waste” – is not only an oxymoron, appropriate word, but also goes directly against Zero Waste and GHG avoidance. If anything “requires” incineration, then that product or process must be re-designed – it is a key indicator with problematic waste streams, and the energy balance will always be negative – many studies confirm that ZW is a far better option than the destruction of resources, together with highly toxic emissions from any waste burning plant – not one such in the world works to spec, and all emit emissions banned under the Stockholm Convention,

particularly dioxins and furans. Further, if the Welsh government took the trouble to do a Life Cycle assessment, they will find that any and all thermal “treatments” of waste are both a toxic and a loss making enterprise, requiring ever growing volumes for waste for so-called “destruction” – the exact opposite of your stated objective.

Sector plans:

Again, these are all end-of-pipe – the closest being retail that is less so. If you do not begin with the source, it will be an expensive and uphill battle, which is probably what waste makers are hoping for – from my perspective, it seems that vested interests control your process, and not government.

How we propose to achieve Zero Waste.

Suggest the following changes:

1) manufacture and import less waste – set minimum standards that are enforceable within exact targets and timelines.

Reduce consumption – this will not suit vested interests, but is critical for success – one key reason why people over-consume, is their lack of positive self-image... remember the US economist Victor Lebow? At the end of World War 2: he said “Our enormously productive economy... demands that we make consumption our way of life, that we convert the buying and use of goods into rituals, that we seek spiritual satisfaction, our ego satisfaction, in consumption.” He succeeded.

2) The indicators still need work – the environmental ones should probably include all pollutants, not just the GHG ones – toxics for example, or endocrine disruptors. Economic indicators should also look to Life Cycle costs and efficiency – while a certain product may generate X number of jobs, they may be hazardous – for example, recycling plastics; but the alternative material may generate more or less, but would be safer. “people in work” is not a great indicator – people with sustainable livelihoods is much better, and more sustainable. Further, some of the social indicators must include reduction in negative health impacts – so you may have more people in “work” and “fewer” emissions, but more people may be harmed by the “fewer” but possibly more toxic, emissions.

Materials to focus on:

Key gap: - organic material (not just food waste)

This represents the quickest win towards Zero waste – I suspect your organic waste is lower, being a more “over developed” country than ours, but still could be in the region of

what, 50% of what normally goes to landfill? Localised composting not only can reduce waste to landfill by that 50% quickly, but can also contribute to emissions reduction by reducing fossil fuel based fertilisers, and the constant move towards organic food production also means reduced emissions generally, while increasing local food security – a must in today's world of fast rising food and oil prices. We have produced documents on this sort of thing, shout if you need copies.

Plastics in their current form can never be sustainable – a move to plastic replacements would be a valuable intervention, from a life cycle perspective – fossil fuel use, toxic chemicals in manufacture (phthalates, bisphenols, etc etc), lack of food safety and re-usability, and the like.

While some may disagree, SCP is not the “best” way in which to produce and consume things – it is only part of the solution, as it excludes many arenas of human activity, such as our economic system and concerns around its sustainability; the way in which we generate good AND services; opportunity and hidden / external costs; the list could go on... SCP is an indicator of possibilities, that is all.

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Ways to approach also has some significant gaps – for example, avoiding the need for the product altogether – i.e. to ask, do we really need this? Other design principles that should be included could be

Design for Disassembly (to allow for repair);

Low energy, water and materials consumption design principles, including renewable energy in production and use

Banning of certain materials (POP's etc)

Sustainable resource use (i.e. phasing out of fossil based and generally non-renewable resource usage)

Proximity principle – produce, use and re-use as locally as possible (i.e. what is the point of making a product in one end of the country, transporting it across the country, and then bringing the packaging back for re-use, when decentralised production would sort out these issues?)

Labour intensity (if you wish to create more sustainable livelihoods)

Human scale development

And most important of all, Cradle to Cradle design

Residual and Hazardous waste.

This implies that any residual OR hazardous waste will be incinerated – this is so off the mark for Zero Waste, I am not sure how to proceed. A genuine ZW model implies NO incineration of any waste, far less hazardous waste. If you have hazardous waste leftover, the design is flawed. That is the way to change this, not by burning it and emitting more GHG than the alternatives as well as poisoning your population and the planet.

Existing landfill sites:

if they are capped, the methane can be captured for local heating, cooking, and process heat – which ever is most local.

They can also be mined for materials, and then capped – thereby reducing the total volume for life.

The targets are very conservative, and unlikely to help in the short term, when the impact is needed most – the diversion of just the commercial food waste (30% +-), home food waste and all other organics, will almost achieve your 2050 target!! Maybe re-think this bit? It also smacks of being a sop, rather than a serious attempt, with these targets and timelines.

I see little, if anything, about enforcement; penalties; and the like – just incentives, so more money to wasters just for doing what is right? Seems wrong, somehow. Similarly, litter – if all waste has a deposit, how much litter do you think there would be? A 95% drop in 30 days?

Would suggest the addition of local organic food production, rather than only focussing on the consumption. This can make a huge impact, if you remember what your country did during times of war... and the challenge is actually greater now than then!

Voluntary targets and agreements:

Short response – these do not work – unless legislated and enforced, you will move at snail's pace, and then be told "Zero Waste cannot work, see?"

Litter

The quickest way in which to solve this problem, is to have a deposit on all packaging – this will drop littering 90% in 90 days – i.e. a financial incentive always works. All other methods are expensive and complex, and unenforceable.

Industry and Commerce.

Without a robust Extended Producer Responsibility programme, your project is designed for failure. Further, no voluntary agreement that we are aware of has worked to date. Unless you are willing to legislate and enforce, this exercise is reduced to a “feel good” proposal, without actually doing anything that will lead to success. Anything up to 90% of waste is produced BEFORE the consumer sees the product, so focussing on the end of pipe solutions is no solution at all. Unless this process tackles waste all along the production chain, it is not possible to reach Zero Waste, nor indeed, 70% recycling.

The public.

The public are the victims of waste, not part of the problem – the public has no say in what wastes they are exposed to, nor which they are required to “manage” – and changing consumption is a critical issue – overconsumption is killing the planet.

Conclusion:

The Institute for Zero Waste in Africa (IZWA) cannot see how the desire of the Welsh Government to reduce their impact to an equitable “earthshare” can be translated into reality, with the proposed programme in its current form. Without the banning of incineration (or any other thermal “treatment” of waste, including the misnamed “energy from waste” more correctly named “waste of energy”); the banning and phasing out of unsustainable and single use packaging and products; a robust and enforceable EPR programme; banning of disposal of organic material; and the direct implementation of Polluter Pays; the Precautionary Principle; and the acceptance the need to reform both consumption and production, this process is bound to fail.

If the Welsh government is serious about it’s commitment to an equitable “Earthshare”, then our perspective as a Southern country with a lower than average share of the global commons, is that the current programme will not achieve this, and will continue to perpetuate the overconsumption of our planet’s resources.

We urge the Welsh government to grasp the nettle fully and firmly, and look to source reduction of consumption in all aspects, to achieve their noble goals, and give short shrift to those who would have you destroy the very resources upon which your share is based through incineration, and make the right moral, ethical and practical choices – genuine Zero Waste.

Please be assured that the Institute will assist in any and all ways possible to make this a reality, given the removal of any thermal “treatment” of waste, or references to “waste from energy”, and a robust EPR programme. Such an approach will deliver the greatest number of sustainable livelihoods while reducing greatly both the volumes and toxicity of negative environmental and health impacts, while protecting Wales from negative impacts from global climate chaos and a wildly fluctuating global economy.

Muna Lakhani
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Institute for Zero Waste in Africa

“It is better to solve a problem before it begins”

Leonardo Da Vinci