



*The Association of Manufacturers
of Domestic Appliances*

Draft Waste Strategy Consultation
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City Hall
The Queen's Walk
London SE1 2AA

14 January 2011

Dear Sir/Madam

Mayor's draft Municipal Waste Management Strategy

AMDEA is the UK trade association for large and small domestic appliances; heating; water heating; floor care and ventilation. We represent manufacturers at UK, European and International level; with government and EU political institutions; in standards and approvals; with non-governmental organisations; with consumers and in the media. AMDEA protects and promotes its members' interests in all these fields.

All our members are fully committed to reducing waste and encouraging recycling but we have some member companies with a particular interest in the segregation of food waste as they manufacture domestic food waste disposers (FWD). FWD can grind practically all food waste into minute particles that are easily carried away by the wastewater system, directly to wastewater treatment where the majority of sludge is treated by anaerobic digestion. We are aware that one of our member companies has submitted a detailed commentary on the draft strategy and we fully endorse this.

While AMDEA's main interest in this strategy is the food waste aspect, our members' products are also subject to the WEEE (Waste Electrical and Electronic Equipment) Regulations and it is possible that impending changes to these Regulations will have an impact on Local Authorities. In these times of severe reductions in funding for public services it is important to understand the implications for the domestic waste stream and for consumer attitudes to recycling.

We have commented on those questions that we feel are most pertinent to our industry.

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1. What do you think are the key issues that need to be addressed in order to achieve this vision?

It is essential to learn lessons from other large municipalities that are currently at the forefront of waste management innovation while appreciating that London is a very old and densely populated city with ageing infrastructure.

In terms of household waste collection there are two key issues: the difficulties faced by residents in high rise or terraced properties with limited waste storage capacity and the difficulties faced by Local Authorities with limited budgets, increasingly onerous targets for waste segregation, public health commitments and political pressure to deal with what is arguably the most important service that they provide to their taxpayers.

In order to enable participation by the maximum number of Londoners the options have to be simple and convenient with minimal impact on residents' lifestyles if they are to be successful. Promoting separate kerbside collection of food waste is difficult as householders are unhappy about storing food waste inside the house yet may have no storage capacity outside. This is exacerbated by those boroughs that have fortnightly collections, particularly in the light of recent adverse publicity about urban foxes and other threats to public health.

At the end of 2010 we saw major disruption of domestic refuse collection in some areas with some collections suspended for several weeks. Fortunately the health risks were mitigated by the severe temperatures which caused the problems but nonetheless putrefying food waste attracts vermin in addition to breeding bacteria. Persuading householders to participate in separate kerbside collection of food waste requires more frequent collection - in some areas of Barcelona, household waste is collected daily, while parts of Somerset cope with a weekly food waste collection that has a relatively good take-up but is not feasible in more densely populated areas. Additional kerbside collections congest residential streets with heavy goods vehicles, generate polluting emissions and increase fossil fuel consumption - in some London Boroughs the waste is transported considerable distances, adding to these effects.

We agree that consumers should be encouraged to reduce the need for disposing of unused food but there will always be a residue and it is vital that London has policies to manage this waste stream. In addition, food waste has potential value - the organic matter can be retained and treated for re-use in agriculture as well as being a valuable source for renewable energy.

Where storage space is limited and collection infrequent, one approach is to remove food waste from the household waste stream at source. A domestic food waste disposer can be a valuable tool for residents wishing to maximise their recycling options. They are a simple and environmentally friendly way for residents to segregate virtually all food waste in their kitchen and are an attractive option for those who struggle with waste segregation (those in high rise buildings, the elderly, infirm, busy, without storage space or just not interested).

One aspect of London's population is that it is highly mobile so even if a resident in one Borough is a committed waste segregator, if they move to another Borough they face a different scheme with different collection schedules and segregation regimes. And the new resident in the vacated property will face the same issue. However FWD units once installed will last at least a decade and remain installed when tenants or owners move. Their performance does not deteriorate with age and they are themselves 95% recyclable.

The addition of food waste to the wastewater system increases biogas production and enhances the nutrient content of organic fertiliser. By weight, AD is the most common method of treating sewage sludge. The fertiliser nutrients contained in the food waste are retained in the digestate, the majority of which (over 85%) can be recycled as nutrient-rich soil improver.

2. Do you think these are the correct objectives, is there anything additional that the Mayor should be focusing on?

We support these objectives but would emphasise the desirability of maximising use of existing infrastructure (such as the sewerage system) and avoiding the carbon impact of further construction of energy hungry processing plants. Transporting food waste via the sewer system to existing waste water treatment works with their established anaerobic digestion plants eliminates the need for additional construction, as well as road transport. The majority (by weight) of London's sewage sludge is already treated by AD and that proportion is increasing.

A particular example of a successful approach to domestic refuse collection is Surahammar in Sweden where the municipality has saved on costs of kerbside collection, transporting the waste to a treatment site, and waste treatment, while the waste-water treatment plant has incurred no extra costs; the biogas output has increased by 46%; and the sewage system has recorded no increase in odour, blockages, or build up of fats, oils or grease. Overall Surahammar's waste strategy has decreased the tonnage of waste to landfill from 3600 tonnes in 1996 to 1400 tonnes in 2007.¹

With reference to encouraging the re-use of items, while we support the concept we are wary of encouraging refurbishment and re-use of electrical appliances. We are concerned about the implications - not only the safety aspects but also the desirability of prolonging the life of items that use a lot of energy. In the past 10 years the energy efficiency of many large domestic appliances has improved to such an extent that a 10 year old fridge freezer will use at least twice as much electricity as a modern one. It is actually better environmentally to dispose of this appliance via a WEEE processing station rather than to continue its use. There are also particular issues around the environmental impact of older refrigerant gases where appliances may be damaged.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

The targets are ambitious but potentially achievable if policies are sufficiently adaptable. However, individual Boroughs already have widely divergent policies for dealing with household waste and they will need assistance (and funds) to implement a range of solutions. FWDs offer a rapid and cost-effective solution that could significantly affect the success rate of reaching these targets in London.

It is worth noting that while post collection separation of dry-recyclables is a cost effective means of working towards a *zero waste economy*, the yield of reusable or recyclable materials is seriously limited by contamination from wet, putrescible food waste. In contrast FWD remove food waste at source. Another argument in their favour is that users consistently express high satisfaction rates. They are not a solution for everybody: some households will tolerate food

¹ Evans, T D; Andersson, P; Wievegg, A; Carlsson, I (2010) **Surahammar – a case study of the impacts of installing food waste disposers in fifty percent of households**. Water Environment Journal. 241 309-319

caddies, some with gardens adopt wormeries or compost heaps/bins but for many people the FWD is an ideal solution to reducing their household waste.

7. What do you think about a CO₂equivalent approach to managing waste? What are the pros and cons and considerations that must be taken into account with this approach?

We welcome an approach that includes calculations of the wider implications of collection regimes.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives.

All processes must be simple and convenient. Composting is not an option for flat dwellers or those in terraced housing with no amenity space. Likewise recycling is difficult without storage space.

If the waste streams become mixed, or there is cross contamination, the cost of separation increases the carbon cost of processing and reduces their market value.

It is also essential that taxpayers believe that their money is being well spent. Waste collection is the one service that affects all Council tax payers and they are therefore particularly averse to the imposition of new conditions/costs. However, many residents are already committed to recycling and merely need not to be discouraged. The challenge is to persuade those residents that will not and to assist those that cannot to achieve participation in waste reduction and segregation.

16. Do you think London should be working towards a vision where it manages most of its waste within its boundaries?

While it is praiseworthy that London should reduce its impact on the rest of the country it seems unlikely that most waste will be managed within its boundaries. Indeed it could be argued that if sufficient energy is generated by London waste this could advantageously be used elsewhere. However it cannot be disputed that minimising the distances that waste is transported has to be a key priority.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The housing density and large proportion of flatted properties; high volumes of traffic; high land prices; a shortage of available sites; ageing infrastructure; and wide variations in personal wealth are all factors that affect London's ability to contain its waste management.

We would suggest that managing London's waste within its boundaries is not a primary objective.

In conclusion AMDEA would reiterate that householders need simple, convenient and affordable solutions to the challenge of dealing with domestic waste.

Encouraging people to reduce their waste is laudable and the present economic climate is likely to encourage many to assess their profligacy - offering simple solutions for dealing with unavoidable waste is the key to achieving the objectives in this strategy.

Yours faithfully

A handwritten signature in black ink that reads "Douglas Herbison". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Douglas Herbison
Chief Executive