



**ECODESIGN CENTRE WALES /
CANOLFAN ECODDYLUNIO CYMRU**

Response to Defra's consultation on Controls on the Handling, Transfer and Transport of Waste.

A Second Consultation, June 2008.

Prepared by Ecodesign Centre Wales 4 September 2008





Ecodesign Centre Wales

Following a sustained programme of activity over a number of years in Wales Ecodesign Centre Wales (EDC) was established in September 2006 as part of the Welsh Assembly Government's commitment to sustainable development¹ and via funding from the Materials Action Programme (MAP)².

EDC mission:

EDC aims to proactively inspire and lead the Welsh Assembly Government, public sector organisations and higher education to enable effective ecodesign in Welsh Industry. We facilitate the open sharing of knowledge and experience with fresh thinking and integrity.

EDC advocate a joined up multi-stakeholder approach and focuses on building capacity and capabilities so that effective ecodesign can happen in Wales. Our message is:

Ecodesign = good design = good business practice

Central to the activities of EDC is the delivery of an **ecodesign initiative** that promotes creative approaches to resource efficiency through four core elements:

- Industry: enabling ecodesign
- Education: embedding ecodesign
- Research: international best-practice
- Communication: positioning and promoting ecodesign

¹ Ecodesign is a key assistive measure in meeting the statutory obligations in relation to sustainable development (SD) through designing out waste and reducing our carbon footprint.

² EDC staff are employees of University of Wales Institute, Cardiff (UWIC) who manage and administer the funding.





EDC Response

This response is primarily based on the experiences of the EDC team of engaging with business, in particular small and medium sized enterprises (SMEs), over a diverse range of sectors (including electronics and electrical equipment, design, general manufacturing, food and drink, fashion and textiles, consumer products) over the past number of years.

EDC are not in a position to make informed comments on the costs, time implications or the enforcement procedure. There are however, three specific areas that EDC would like to take this opportunity to comment upon.

Q11. Do you have any comments on the effectiveness of the proposed requirement to prevent breaches of TFS controls?

Illegal exports of poorly sorted recycled waste should be stopped. As well as enforcement measures it is critical that we find ways to improve Material Recycling Facilities (MRFs) to ensure that all waste is appropriately sorted and therefore not a landfill burden.

Taking steps to prevent unsorted or poorly sorted municipal waste arising from MRFs will require a policy mix of push/ pull mechanisms: more stringent licensing arrangements in partnership with systems innovation and infrastructure investment. The work commissioned by the government should help to illustrate this joined up approach.

Q15. Do you think it is proportionate to introduce fines for householders?

Considering the proportion of household waste fly tipped it seems appropriate to include householders into this regime. It will be necessary for householders to be made more away of the role that they play thereby extending the concept of 'producer responsibly' to 'user responsibility'. To be effective, as recognised in the report, a strong communication campaign will be required. Householders will need to be given clear disposal choices to avoid creating any further fly tipping burden. Please see response to Q20 for additional information.

Q20. Do you have any comments on the proposed content and format of the guidance?

Proposal 12, 'Developing a national and/or regional awareness raising campaign' is absolutely critical. EDC appreciate that guidance data is





available for various stakeholders but for a variety of reasons this information does not always reach the target audience.

Many public communication / information strategies have not been as successful as hoped, whether they have been based upon public health campaigns or energy efficiency. EDC recommend that a design led approach is taken when developing this guidance to ensure that the needs of the 'user' (the user of the information) always remain key.

In terms of sustainable development, waste and recycling activity are actually very tangible and very visual indicators. The public (which includes employers and employees) can, through informed choice, make a positive impact. The management of waste is a useful vessel upon which to include the sustainable consumption and production message and encourage user / consumer responsibility. For this reason the idea to involve retailers such as DIY stores is deemed to be an excellent approach. Some of the work being undertaken by M&S under their 'Plan A' and the communication successes of eco labels such as the Forest Stewardship Council (FSC) could be interesting case studies. Working with retailers will undoubtedly strengthen the message across the complete supply chain.

The challenge is, through good communication design, to find ways to keep people up to speed with best disposal practice, reduce bad practice and encourage proactive behaviour. It will be important to not ostracise those that already comply. Using new models such as retail stores and concepts of sustainable consumption EDC believe that the message can be successfully pitched at a variety of end users, those that are striving to improve and those that are non-compliant.

The guidance will need to communicate clearly all the options available within a municipality and the choices each individual can make. As commented upon in the report, the 'What's in it for me?' question will have to be addressed. Any guidance should focus upon enabling people to make informed choices rather than focussing on disassociation and inactivity.

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