

General comments on the responses to SWWGP questions

Wiltshire Council responses leave many questions unanswered, as well as generating more uncertainty as to its strategy on waste management.

This needs to be seriously challenged by the Environment Select Committee and they will be failing in their duty as a scrutiny committee of the Council if they allow the present status of long term contracts and lack of flexibility in approach to remain.

Principal areas of concern that remain are:

1. Reduction of waste and tonnages reported

- Application of the waste hierarchy is a legally binding requirement. The primary action in the hierarchy is reduction of waste at source to prevent ever increasing costs and environmental damage in the long term. This does not appear as a major element in this survey.
- Tonnages are presented by the Council to present the most favourable position, not the real one. Analysis of data available on Wiltshire Council's website demonstrates a very different picture.

The council agrees that the Waste Hierarchy is an important and legally binding requirement. It is the aim of the new strategy to ensure that the waste hierarchy and the principles of sustainable waste management practices that it promotes are central to the new waste management strategy, as they were in the previous strategy.

The council's commitment to the waste hierarchy is evident from the start of the development of the new strategy. The development of the strategy began with council member engagement sessions, at which the discussion questions were based on managing waste in accordance with the hierarchy by making best use of recycling services and encouraging residents to reuse and reduce their waste. The outcome of these workshops was documented in a report which was considered by Environment Select Committee members in September 2017. The themes which emerged were used to develop the questions asked in the consultation survey. The first question asks residents about their priorities for the waste service. Throughout the survey there are references to how the council can better engage with residents to reduce the waste they produce. Behavioural change to protect the environment is challenging to achieve but the results of the survey will help us to design practical and deliverable initiatives to engage residents and encourage them to reduce the waste they produce.

The most recent update report provided to Environment Select Committee members outlines the key themes that have been noted from the consultation results. Many of these themes relate to working with residents and partners to reduce waste and encourage reuse, therefore managing waste higher up the hierarchy.

2. Incineration

- Signing up to 25 year plus contracts for residual waste disposal by incineration is NOT a sustainable solution. Waste composition will change and new technologies will become available making the old technologies redundant in significantly less than 25 years.
- Use of incineration as a long term solution to disposal of waste that can be processed in more appropriate ways is wrong and should be revisited in detail for both commercial and environmental reasons, particularly when emissions add to existing local air pollution.

Because of the capital investment required for energy from waste facilities, longer term contracts sought to make the price per tonne of waste processed affordable and ensure that developers can obtain the significant investment necessary to fund the building of such facilities. Given the current lack of UK-based treatment capacity and the uncertainty associated with export of refuse derived fuel and solid recovered fuel, the council benefits from longer term certainty over provision of landfill diversion options that these 25 year contracts bring. Waste treatment facilities that comply with the relevant emissions standards are likely to remain a viable waste management option, and have the potential to contribute to the UK becoming a self-sufficient energy producer. In terms of the waste hierarchy they enable energy to be produced from processing waste which is less damaging to the environment than landfilling waste.

3. Food waste

- Delivery of a successful food waste collection as part of a circular economy is both demonstrable in the market place and essential to reduce total waste tonnage going to landfill or incineration. This should be a priority for WC to cut final residual waste volume.

In line with the waste hierarchy, Wiltshire Council's current waste management strategy prioritises waste prevention over the collection of any waste either for recycling or disposal. This is especially extended to food waste. The strategy encourages residents to prevent food waste from being produced in the first place and to compost any food waste that they have at home. It is possible for many residents to waste much less food (and thereby save their family an average of £700 per year) by following a number of simple steps and we are campaigning to encourage residents to do this through the tips promoted by WRAP's Love Food Hate Waste campaign (www.lovefoodhatewaste.com).

The council also subsidise the sale of food waste composters to residents. This super compost bin can digest all food waste, including leftovers, meat, dairy, fish and bones, as well as garden waste. The council has sold in excess of 8,000 food waste composters to Wiltshire residents since the council started subsidising the cost of them in 2007.

These food waste prevention methods provide significant benefits to many residents as well as diverting food waste from bins, providing savings for residents and the council.

The collection of food waste does not encourage some residents to reduce the food waste that they produce, in fact sometimes it perpetuates the problem of excessive food waste as they believe that there is an environmentally acceptable way of treating this. Contamination can be a problem as residents do not always remove the packaging that the food waste is in before putting it into the food waste container. Such contamination can cause significant operational problems for the anaerobic digestion plants that this waste is usually delivered to. On the other hand, being confronted by how much food some families waste can promote significant behaviour change, with a number of councils reporting a substantial reduction in the tonnage of food waste they collect once a scheme has been operating for a period of time. This may mean that inefficiency is built into the collection rounds as there has to be sufficient capacity to collect peak tonnages when the service is introduced.

As you are aware, question 13 of the consultation survey asked respondents how they would like to manage the food waste that they produce. The results of the survey showed that 57% of respondents would prefer to reduce their food waste and manage their food waste at home. 16% would prefer separate food waste collections either in town and city centres only or county-wide. The remainder preferred to put food waste in their bin for non-recycled waste without the need for a separate collection.

4. Contracts

- Such Long term contracts and minimum tonnage requirements will stop behaviour change in Council, Contractor and people behaviour. By encouraging reduction of waste at source and enabling households to maximise recycling, plant will inevitably become obsolete early.

There are examples where contracts with **no** minimum tonnages drive **Contractors'** behaviour change to ensure that their investment remains sound rather than relying on Council support.

The presence of 25 year waste treatment contracts will not prevent Wiltshire Council from continuing to focus on the waste hierarchy and ensuring that waste prevention and minimisation activities are delivered. Continued growth in housing and population means that there will remain a long term requirement for non-recycled waste treatment in order to avoid sending waste to landfill. This sits alongside our continuing focus on waste prevention and efforts to further increase the amounts of waste recycled. Last year four million tonnes of solid recovered fuel and refuse derived fuel were exported to energy from waste plants due to a lack of capacity in the UK. Should the council reduce the quantity of non-recycled waste collected from households due to success with waste minimisation and increased recycling, negotiations would take place with the operators of energy from waste plants and other waste producers to ensure that tonnage requirements continue to be met.

5. Housing

- WC raise the issue of additional homes in the County. This is an opportunity for the Council to demonstrate forward thinking with new, more efficient ways of dealing with waste in the new estates that will be created. There are many examples in UK and other countries.

The council has recently now approved a Supplementary Planning Document aimed at encouraging house builders to actively consider the layout of proposed developments to ensure that adequate waste storage is provided at properties, including storage for recyclable materials to facilitate kerbside recycling collections. The document also sets out minimum access requirements to ensure that waste and recycling collection vehicles can ensure kerbside collection services are available to all.

6. Strategy

- We agree with the statement that “the time required to procure new services.... is significant”. We think a proper strategy based upon a wide ranging change of direction for waste management is vital to deliver commercial and environmental benefits.

The recent Councillor’s workshops and public survey will not deliver this. It will simply underline the proposed strategy as the correct one, leading to stagnation and no savings whatsoever. Bold thinking is required and proper challenge by the Environment Committee essential to deliver a robust plan.

The development of the council’s new waste management strategy will be based on applying the statutory principles of managing waste in accordance with the waste hierarchy, whilst balancing the constraints of reduced budgets and supporting delivery of the council’s priorities which are contained within the business plan.

Environment Select Committee members have been involved in the development of the new waste strategy from the initial scoping meetings. Regular updates have been provided, and will continue to be provided, until the council finalises a strategy for adoption.

Questions remaining unanswered on Council Waste Strategy

Supporting waste reduction and increases in recycling

1. Q. Has WC given any consideration to how it can encourage or incentivise behavioural changes? For example:

- Lead Wiltshire change by becoming a ‘single-use plastic free’ council and phase out the use of unnecessary and unrecyclable single-use plastic (SUP) products in all council activities by April 2018. Encourage facilities’ users and local businesses to do the same by championing alternatives.
- Set a target for zero household waste to landfill by 2020.
- Set a target for recycling 70% waste by 2020.
- Set targets for Wiltshire retailers and manufacturers to reduce and replace plastic packaging.
- Set targets to phase out single use, non recyclable plastics and film.
- Join with Wiltshire shops to introduce deposit return schemes on plastic and glass bottles to reduce the amount of glass and plastic in our waste and cut down waste collection costs.
- Encourage reuse and refilling of containers.
- Measure performance publicly to give communities confidence that Wiltshire Council are taking waste management seriously.

Emerging themes from the waste strategy consultation survey are being presented to Environment Select Committee members at the meeting on 16 January. The key themes that have been highlighted in the report start to give the council direction on how it can encourage and incentivise behaviour change. The key aim of the survey was to gather a valuable insight into residents’ behaviours and opinions on waste management in Wiltshire. The information collected will help the council design deliverable initiatives to promote behaviour change.

A key theme from the survey is that respondents felt that the council should be working in partnership with Wiltshire residents as well as local and national organisations to help reduce the amount of packaging and single use plastics that residents are left to manage at home. Officers replied to a question to full Council and presented a report to Environment Select Committee

members on 13 June and again on the 19 September which referred to reducing single use plastics in Wiltshire.

The government's 25 year Environment Plan was published on 11 January 2018. The plan refers to eliminating any avoidable plastic waste by 2042, where technically, environmentally and economically practicable to do so. The council shall review the requirements of the Environment Plan and follow this and other national drivers with interest and respond accordingly. The council's new waste management strategy will need to be flexible in order to respond to such emerging priorities.

A target of zero waste to landfill is unachievable. Unfortunately there will always be a requirement to send some types of waste to landfill, for example asbestos and some un-reusable bulky items. It is therefore not practicable for the council to suggest this as a target in the new strategy. The council's research has shown that those organisations, for example Zero Waste Scotland, which are working towards a Zero Waste to landfill strategy define zero waste as less than 5% of waste sent to landfill. The council has reduced the amount of waste it sends to landfill significantly during the life of the last strategy. This will continue to be a priority in accordance with ongoing application of the waste hierarchy.

Legislation in England and Wales states that local authorities should achieve a national target of 50% of waste recycled by 2020. This is the target that Wiltshire Council is aiming to achieve. A new EU target of 70% recycling has been debated as part of the negotiations on new waste legislation for the EU. Agreement has not yet been reached on whether this will be adopted by the EU, or by the UK following exit from the EU.

Given the likely changes in waste legislation during the period of the new strategy, this will be based on key principles with a statement of intention to review and implement new targets as they are transposed into UK law. Officers propose that they produce an annual performance monitoring report to present to members. This would report performance in the previous year, set out proposals for future performance and provide an update on changing national and local drivers.

New ATT plant

1. Hills have completely changed their plans for the ATT plant since planning was given.

The whole process will change, from waste delivery to final disposal of bottom ash. Waste composition may well need to be different for a different plant type; the plant outputs, including emissions, will inevitably be different and the physical and carbon footprints will change. This must require a new planning application once the details are known and the people deserve the right to challenge such a plan through this process. Allowing major changes to the technology through on subsequent Section 73 planning amendments does nothing to increase public confidence.

Q. Will the Environment Committee challenge the planning position and ensure the opportunity for public scrutiny?

The statutory planning process provides the opportunity for public consultation on proposed development.

2. WC has a statutory obligation to protect air quality in Westbury.

Q. Will the Environment Committee insist on commissioning a new and independent health risk and air quality assessment for the proposed plant paying particular attention to the ultra-fine particulate emissions?

The Environmental Permit (to be issued, monitored and enforced by the Environment Agency) will define the permitted emission levels that the facility must meet. These will be set by the EA to ensure that any development minimises damage to the environment and human health. The EA has undertaken to carry out a public consultation on the application for an environmental permit for the ATT plant.

3. Q. Is there any connection between the recent outline planning application by Tarmac to redevelop the Westbury Cement works including a possible biomass boiler and the production of refuse derived fuel from the proposed ACT plant?

The council's waste management team is unaware of any connection between the proposals from Northacre Renewable Energy and Tarmac, or proposals for future partnership working between the

two commercial operators. The Northacre ATT would take solid recovered fuel (SRF) from the existing Northacre Resource Recovery Centre (MBT plant) and other non-recycled waste.

4. Q. Will the cumulative effects of both industries and associated traffic on Westbury's air quality be considered and by whom?

Emissions from both facilities would be governed by the Industrial Emissions Directive and subject to limits defined in the Environmental Permits to be issued and enforced by the Environment Agency. The ATT proposed by Northacre Renewable Energy already has planning permission, and air quality was considered as part of the application process.

In the case of the proposed ATT, due to the nature of the proposal for the ATT and the requirement to vent emissions to air, the application was accompanied by an Air Quality Assessment (AQA).

Planning Policy WDC2 requires that proposals for waste management development in Wiltshire and Swindon will be permitted where it can be demonstrated that the proposal firstly avoids, adequately mitigates against, or compensates for significant adverse impacts relating to air quality and climate change.

National Planning Policy for Waste states that when determining waste planning applications, waste planning authorities should: consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies; Appendix B sets out the factors waste planning authorities should consider in determining planning applications:

g. air emissions, including dust

Considerations will include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles. Detailed atmospheric dispersion modelling has been undertaken to assess the effects of emissions from the proposed development.

It was considered that the ATT proposal is unlikely to lead to demonstrable harm to air quality in the area.

5. Q. Will the Environment Committee review the potential waste supply contract with Hills to ensure that flexibility is paramount for the Council, to avoid locking into costly long term commitments?

The current contracts provide opportunities for annual review and can be varied through a formal contract change mechanism as required, in order to ensure the contract remains fit for purpose. The council would not enter into a contract with Hills Waste Solutions (HWS) to deliver waste to the proposed ATT plant. Under the contract for mechanical and biological treatment (MBT) of non-recycled waste, HWS have to secure outlets for the solid recovered fuel (SRF) produced by the process. Provided HWS could demonstrate that the ATT plant meets the requirements under the MBT contract for treating the SRF, the council would not object to the fuel being delivered to the ATT plant.

6. There is a risk that recyclates otherwise recoverable will be used as fuel for the ATT plant to maintain volume throughput. This may be a principle commercial position for the plant to be viable that should not be supported by WC. The plant has already been awarded a 15 year subsidy in the recent Contract for Difference auction and WC should not have to prop up its commercial viability.

Q. Will the Environment Committee review the potential contract with Hills to ensure that there is no subsidy built into the pricing?

We do not anticipate any separate contract between the council and Northacre Renewable Energy in respect of waste into the facility. As set out above, the ATT facility could become an approved SRF contract under the existing MBT contract in order that the SRF from the MBT is delivered to the ATT instead of being exported to other European countries as is currently the case. The council would ensure that any proposal would provide value for money.

7. Q. Will the Environment Committee ensure that all reasonable endeavours are required to extract recyclates from the waste stream, from WHATEVER source, before considering incineration.

The council provides a kerbside collection of dry recyclable materials and will extend the range of materials to be collected from 30 July 2018. Removal at source remains the best option for separating high quality recyclable materials. In the context of the Northacre Resource Recovery Centre (MBT plant) metals will continue to be extracted from the residual waste for recycling. ATT facilities would typically have measures in place in order to extract certain materials from the waste delivered, where feasible to do so.

8. Q. Would the bottom ash from the proposed ATT plant be classed as active waste?

This detail would be specified as part of the application for an Environmental Permit, and any active material would need to be managed in accordance with strict environmental standards, and as specified in the permit. However, many waste treatment technologies enable significant recycling and re-use of ash for use as a building aggregate.

9. Q. What are the projected tonnages of ash and how would it be treated and disposed of and at what financial cost?

As this is a commercial facility, Wiltshire Council does not have this technical detail regarding tonnages of ash, as it was not provided as part of the planning application process. The pollution controls employed to ensure the necessary emissions standards are met would be monitored by the Environment Agency. The proposals for treatment and their costs would be the responsibility of HWS, given the ATT plant will be operating as a commercial merchant facility. If the council does not object to the terms of the proposed contract the gate fee paid for the treatment of the SRF would encompass all costs associated with the process.

Food Waste Management

1. You say “offering a food waste collection service does not guarantee that all food waste will be collected”. We agree, but **NO** food collection **does** guarantee that this resource is wasted and the residual bin remains heavily contaminated with organics, virtually guaranteeing that it will go to incineration.

Q. Will the Council revisit the food waste collection feasibility study of 2009 with vigour as part of the strategy review planned ?

The council will continue to focus on encouraging residents to reduce their food waste and to compost it at home, as these are the most environmentally beneficial ways of managing this waste stream.

2. Q. As part of the strategy review will the Council consider a trial food waste collection in Trowbridge, Warminster and Salisbury and/or a rural area?

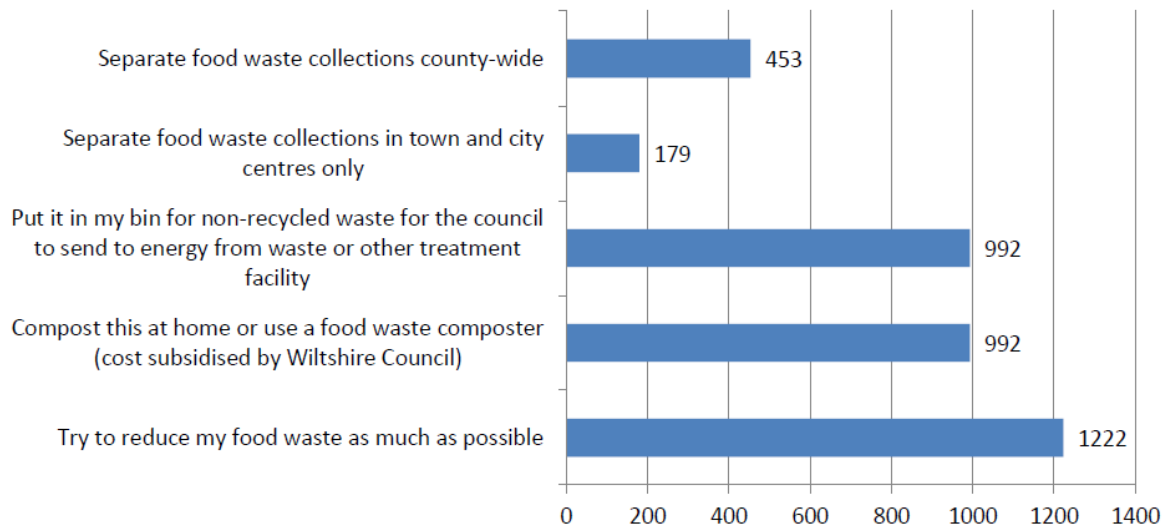
The results that have emerged from the public consultation have demonstrated that the majority of residents do not want a separate food waste collection service to be implemented.

Please see the extract from the survey and results below.

Qu 13. Currently the council does not collect food waste separately. The reason for this has been that separate collections are very expensive to operate, particularly in large rural counties such as Wiltshire and it is usual practice to collect food waste weekly. In addition, other local authorities have introduced food waste collections but found they did not collect as much food waste as hoped due to people reducing their food waste once they saw how much they were throwing away, people not producing much food waste, or people not wanting to store food waste in a separate container.

How would you prefer to manage your food waste?

(one option could be chosen)



From 3838 responses to this question, 632 respondents expressed a desire for a separate food waste collection, be that in town and city centres only or county-wide. This amounts to 16% of total respondents with 32% expressing a preference to reduce their food waste, raising this up the waste hierarchy.

It would therefore be inefficient to trial food waste collections or to review the feasibility study at the present time. In addition, we know that, if implemented, this service would not be used by all residents and therefore would not capture all food waste. This means that the residual waste would still be contaminated by food and thus be unsuitable for treatment other than energy from waste.

3. Q. Has WC recently approached local biodigester businesses to explore the possibility of food waste collections and to establish the likely Anaerobic Digestion gate fees?

Local anaerobic digesters have been approached. Whilst local businesses were keen to speak to the council, they do have concerns about the quality of product which would be collected from Wiltshire residents. Contamination from a local authority's food waste collection is generally high as residents will include food waste packaging with the food waste itself and this is difficult to manage for these digesters. Experience from other local authorities suggests that residents struggle to separate food waste from its packaging waste, therefore resulting in high levels of non-target product being collected. Many digesters have had to introduce a front-end cleaning and separation facility to remove this contamination before the separated food can be treated. The largest, and arguably most consistent quality feedstock for these types of facilities tends to be food waste from restaurants, food producers and supermarkets whereby high volumes of similar waste is collected, without the risk of high levels of contamination.

4. Q. What comparisons did the council make with other mixed rural and urban authorities to determine affordability?

We haven't made comparisons with other similar local authorities. The affordability of such a service would be based on an assessment of the cost to provide this service for Wiltshire residents.

5. Q. Will the council, as a part of the strategy review, compare the financial and environmental benefits of a food collection reducing the contamination of dry recyclates and reducing the volume of residual waste against the 'risk' of redundant capacity in a food waste collection? Note that this "risk" can be further offset by ensuring that the Contractor is required to have sources of organic waste available from the commercial sector built into the contract to make up shortfalls.

The provision of a separate food waste collection service would not guarantee that all food waste would be captured. As such we would not be able to reduce the contamination by food waste of the remaining residual waste to enable us to further sort this for recycling. The best way to improve the quality and quantity of recyclable materials collected is to encourage residents to separate these items at home and place them together in a clean container for collection.

In addition, we would not be supportive of council tax payers subsidising commercial business food waste disposal so would not consider entering into a contract in which this was a factor.

Hills collections contracts

1. Hill's charged the Council £103502 in vehicle repairs and maintenance according to the most recent open data (Aug 16-July 17)^[1].

Q. Have the Council bought, or leased the waste and recycling collection vehicles and, if so, why were the associated costs for maintenance charged?

Under the current contract for recycling and landfill services, Hills have operated kerbside collection vehicles that were procured by the council. Routine maintenance and running costs were borne by Hills as the service provider. Hills have recharged a total of £103,502 for the period August 2016 to July 2017 for non-routine servicing and maintenance to the kerbside collection fleet. The kerbside fleet utilised by Hills Waste Solutions to deliver the county-wide black box service is an aged fleet, with the majority of the vehicles being over 10 years old. The current age of the vehicles is in excess of typical industry practice and therefore additional costs are being incurred to keep the fleet in service and legally compliant, until new arrangements commence and a new fleet is deployed. The council has awarded a collection contract which includes the introduction of a co-mingled mixed dry recycling service with glass separate. The life span of the existing kerbside sort (black box) fleet has had to be extended to cover the additional service delivery period until the new contract commences on 30 July 2018.

2. It would increase contract flexibility if WC owned/leased the vehicles, enabling changes to be made to maximise recovery

Q. What consideration did WC give to joint procurement between councils for such vehicles and will the new strategy address the leasing or purchasing of new vehicles?

No consideration was given to jointly procuring vehicles (either direct purchase or leasing) with other local authorities. Each council has different requirements for vehicle configuration to meet their method of collections, coupled with vehicles having to be replaced at differing timescales. The strategy will embody the principle of monitoring technical developments and methods of procurement for future contracts

3. Q. How will Hills process the increased recyclates introduced by the new collection contract?

Hills have been awarded a contract to manage and sort the recyclate collected and to ensure it is sent to appropriate re-processors. This contract does not require Hills to process the recyclable materials direct but permits the sub-contracting of materials re-processing.

4. Q. What % increase in recycling rates is anticipated by new collection contract?

A number of factors influence the level of recycling performance which can be achieved in an area. Wiltshire Council is committed to meeting the statutory target of 50% of household waste to be recycled by 2020.

5. Q. Will whatever plant is used to process the new recyclates stream be flexibly designed to enable adjustments as the waste stream changes over time?

Each re-processor of individual waste streams (for example a paper mill treating recyclable paper) requires different plant and equipment to enable them to re-process the material or materials to be treated. Should different materials be collected over time, Hills will be required to source an appropriate re-processor to manage any new or differing materials.

MBT, Lakeside and landfill contracts

1. You say 'The MBT plant is designed to treat non-recyclable waste and it was never anticipated that a significant amount of recyclable material would be separated'.

Q. How does this plant meet future needs if it's not designed to extract recyclates?

The plant is designed to treat the residual waste left over after recycling. It does not compromise the council's continued efforts and activities aimed at encouraging its residents to reduce waste at source, and to increase the current levels of recycling. Even with increased levels of recycling, the

plant will continue to meet the council's future needs for treatment of non-recycled waste, as housing grows and residents continue to produce waste which cannot be recycled.

2. You say 'There is a financial imperative to find an alternative, more sustainable, way for this material to be treated'

Q. Please explain your definition of 'sustainable' and also the alternatives that WC are pursuing at the present moment.

More sustainable ways of treating material would be those which further reduce any environmental impact. The council encourages Hills to identify suitable facilities in the UK for treatment of the fuel produced by the MBT plant, in order to avoid the current export of this material to energy from waste plants in other European countries. Currently there is a lack of UK-based capacity for such material, and an ATT facility in Westbury would be a possible recipient, and immediately adjacent to the source of the fuel.

3. Q. How will 'continued affordability' be determined by the council with regard to gate fees at Hill's MBT plant and Lakeside EfW?

Continued affordability would be determined by comparison of gate fees to other alternatives for treating residual waste.

4. Q. What are the gate fees for Lakeside and Hill's MBT and why are these figures deemed commercially sensitive when they are met by public money?

The waste management service is seeking legal advice on whether the gate fees could be disclosed. They are commercially sensitive as to disclose them would impact on the contractors' competitive position in tendering for future contracts.

5. Q. What are the contractual financial penalties for not meeting minimum tonnages for Lakeside and Hill's MBT?

The provider may make a claim for payment if they are able to prove they have incurred a loss through a reduction in tonnage delivered by the council.

6. Q. How and by how much will the new contracts reduce waste going to landfill?

The new waste collection and waste management contracts include provision of a revised kerbside recycling collection service which has been designed to make it easier for householders to participate. This will enable the collection of a wider range of recyclable materials including plastic pots, tubs and trays and food and drink cartons, in addition to the materials already collected for recycling. We anticipate reaching a recycling rate of 50% by 2020 following the implementation of these new services during 2018/19. A new materials recovery facility will be provided allowing better separation of materials collected through a new co-mingled service.

7. Q. How will WC and the Wiltshire community benefit from this?

Wiltshire Council and Wiltshire council tax payers will benefit through increased opportunities to recycle at the kerbside, and further avoided landfill disposal costs.

8. Q. How much Landfill Tax did Wiltshire Council pay Central Government in 2016- 17?

£3,192,666

General

1. Wiltshire Municipal Waste Management Strategy was updated in 2016.

Q. How will the new strategy address future needs when a key element in waste treatment and recovery, Hill's current MBT plant, does not and did not do so?

The MBT successfully diverts and treats a significant amount of Wiltshire's residual waste which would otherwise be destined for landfill.

2. Q. By what method are domestic, municipal, commercial and industrial waste tonnages recorded and accounted for? When do the council review such tonnages?

The council as waste disposal authority records and reports to the Environment Agency all household waste tonnages and the tonnages of commercial waste which the council collects. All waste tonnages are monitored by the Environment Agency. The council does not monitor waste tonnage it has no direct responsibility for, including the vast majority of commercial and industrial waste.