



16 September 2010

STAGE TWO: CONSULTATION ON THE TRANSPOSITION OF THE REVISED WASTE FRAMEWORK DIRECTIVE (DIRECTIVE 2008/98/EC)

INTRODUCTION

1. The UK Environmental Law Association (**UKELA**) aims to make the law work for a better environment and to improve understanding and awareness of environmental law. UKELA's members are involved in the practice, study and formulation of environmental law in the UK and the European Union. UKELA attracts both lawyers and non-lawyers and has a broad membership from the private and public sectors.
2. UKELA prepares advice to government with the help of its specialist working parties, covering a range of environmental law topics. This response has been prepared with the help of the Waste Working Party.
3. UKELA makes the following comments on the joint Defra/WAG Stage Two: Consultation on the transposition of the revised Waste Framework Directive (Directive 2008/98/EC) (**rWFD**).

GENERAL COMMENTS

4. UKELA would welcome the opportunity to meet with and discuss the draft Waste (England and Wales) Regulations 2010 (**Regulations**) further with Defra and/or WAG, if this would be of assistance.
5. UKELA notes from paragraph 2.5 of the consultation document that Defra intends to issue for consultation draft guidance on the implementation of the post-consultation transposing Regulations. UKELA is concerned that this draft guidance has not been included in this consultation, as it is not possible to properly consider the effectiveness of the transposition of the rWFD in the absence of the full transposition "package" of regulations and guidance, which must be considered together. It is now unlikely that the guidance can be consulted on and adopted before the 12 December 2010 transposition date, when it is noted that the Regulations are intended to come into force. This also leaves those affected by the Regulations in the position of having to comply with them with no guidance as to how they are expected to do so.
6. The consultation document makes references to the Defra/WAG "Consultation on the legal definition of waste and its application" published in January 2010 (in paragraphs 2.7, 2.11, 2.62 and 2.135). UKELA notes that Defra has not yet published a summary of responses to this consultation or its own response. UKELA has real concerns about the practice of making decisions on the transposition of the rWFD on the basis of draft guidance for which there is no clear timetable for formal adoption and urges Defra to progress the guidance on the legal definition of waste and its application as a priority. This is particularly important in the light of Defra's/WAG's proposed transposition of Article 3(1) of the rWFD (see comments in paragraph 7(a) below).

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QUESTION 1: DO YOU AGREE THAT THE DRAFT TRANSPOSING REGULATIONS CHAPTER 3 OF THE PAPER (PAGE 59) FULLY AND CORRECTLY TRANSPOSE THE REQUIREMENTS OF THE rWFD? IF NOT, PLEASE IDENTIFY THE SPECIFIC REQUIREMENT OF THE rWFD AND GIVE REASONS TO SUPPORT YOUR VIEW THAT IT IS NOT FULLY AND CORRECTLY TRANSPOSED IN THE DRAFT REGULATIONS.

7. UKELA notes that Defra's/WAG's view is that existing policy and legislation in England and Wales already transpose various Articles of the rWFD, particularly those Articles which Defra/WAG has deemed reflect the equivalent Articles of Directive 2006/12/EC (with or without revisions). UKELA makes the following comments in respect of the transposition of the remaining provisions of the rWFD in the draft Regulations:

- (a) As noted in paragraphs 2.7 to 2.11 of the consultation document, Articles 2(1), 2(2) and 2(3) of the rWFD exclude specified wastes from the scope of the rWFD. However, these Articles do not declassify such substances as "waste". UKELA notes that regulation 3(1) of the draft Regulations does not define such substances as "waste", thereby adopting a narrower definition of waste than the rWFD. Whether this is a correct transposition of Articles 2(1), 2(2), 2(3) and 3(1) of the rWFD is arguable, but UKELA suggests that it is likely that confusion and legal uncertainty will arise over the definition of the term "waste" if the term is given a narrower meaning in the draft Regulations than in the rWFD. UKELA recommends that the term "Directive waste" be used in the draft Regulations instead of the term "waste" to describe waste that is subject to the controls of the rWFD and the draft Regulations; in this regard it is noted that the draft guidance in the "Consultation on the legal definition of waste and its application" used the term "Directive waste" to describe waste that is subject to the existing WFD's controls (paragraph G3.25).
- (b) Please refer to UKELA's responses to questions 3 to 7 in respect of the proposed transposition of the waste hierarchy set out in Article 4 of the rWFD.
- (c) UKELA notes that, as outlined in paragraph 2.107 of the consultation document, Defra will keep under review, and reassess in 2015, developments relating to the collection, sorting and recycling of mixed plastics in terms of transposing the relevant separate collection requirements of Article 11(1) of the rWFD.
- (d) Article 16(1) of the rWFD requires Member States to:

"... take appropriate measures, in cooperation with other Member States where this is necessary or advisable, to establish an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal waste collected from private households, including where such collection also covers such waste from other producers, taking into account best available techniques."

Regulation 20 of the draft Regulations proposes transposing this requirement in the context of the exercise of planning functions, by requiring planning authorities to have regard to Article 16(1), but ignoring the words "taking into account best available techniques", when exercising their planning functions where these functions relate to waste.

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In UKELA's view, this proposed approach represents a departure from the requirements of the rWFD and would arguably mean that the rWFD has not been fully and properly transposed in England and Wales. In any case, UKELA considers it prudent that planning authorities be required to take into account best available techniques when exercising their planning functions. Such a requirement is consistent with:

- (i) Defra's/WAG's proposals at paragraph 2.30 of the consultation document to require local authorities to have regard to the waste hierarchy – which should necessarily involve a consideration of best available techniques relating to waste treatment – when preparing Waste Development Frameworks (in England) and Local Development Plans and Regional Waste Plans (in Wales); and
 - (ii) paragraph 5(1) of Part 1 of Schedule 1 to the draft Regulations in respect of waste prevention plans and waste management plans.
- (e) Article 18(2)(c) of the rWFD states that for a derogation from the ban on the mixing of hazardous waste to be allowed, a number of requirements must be satisfied, including that the mixing operation must conform to best available techniques (Article 18(2)(c)). Paragraph 2.165 of the consultation document highlights that this requirement is additional to the requirements under the existing WFD and that:

"Defra and the Environment Agency consider that the Agency should initially take a pragmatic approach to the enforcement of this requirement until the actual impacts are clearer."

UKELA agrees that Defra/WAG should take a pragmatic approach to the enforcement of the derogation requirement introduced by Article 18(2)(c). However, to provide certainty for businesses dealing with hazardous waste, Defra/WAG should provide further clarity as to how this requirement will be enforced in practice and whether consequential policy/legislative amendments (such as to regulation 19 of the Hazardous Waste (England and Wales) Regulations 2005) will be required to ensure that Article 18(2)(c) of the rWFD is fully and correctly transposed.

- (f) Paragraph 2.169 of the consultation document notes that Article 35 of the rWFD extends the relevant record keeping requirements – currently set out in regulation 49 of the Hazardous Waste (England and Wales) Regulations 2005 – to waste dealers and brokers. Defra/WAG propose to deal with this amendment through Paragraph 17 of Part 3 of Schedule 2 to the draft Regulations. However, paragraph 2.170 of the consultation document states that:

"Defra's/WAG's view, which is shared with the Environment Agency, is that we should consider adopting a pragmatic approach towards the implementation of this new requirement in order to ensure a proportionate application of Article 35."

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Again, while UKELA agrees that Defra/WAG should take a pragmatic approach to applying Article 35 in the context of the proposed amendments to the Hazardous Waste (England and Wales) Regulations 2005, greater clarity is required as to how this will work in practice.

QUESTION 2: DO YOU CONSIDER THAT ANY OF THE PROVISIONS IN THE DRAFT REGULATIONS CHAPTER 3 OF THE PAPER (PAGE 59) DO MORE THAN IS NECESSARY TO TRANSPOSE THE REQUIREMENTS OF THE RWFD (E.G. GOLD-PLATE)? IF SO, PLEASE IDENTIFY THE PROVISION IN THE DRAFT REGULATIONS, AND THE REQUIREMENT OF THE RWFD, AND GIVE REASONS TO SUPPORT YOUR VIEW THAT THE PROVISION DOES MORE THAN IS NECESSARY TO TRANSPOSE REQUIREMENT.

8. UKELA notes that Defra/WAG propose to use the draft Regulations to give effect to the 2005 judgment of the European Court of Justice (**ECJ**) in Case C-270/03 relating to the requirement for professional waste carriers who "normally and regularly" transport waste to be registered (paragraphs 2.194 to 2.196 of the consultation document). Whilst the changes proposed by Part 8 (Chapter 2: Registration) of the draft Regulations are not strictly required to transpose the rWFD, UKELA agrees that the draft Regulations are an appropriate forum to give effect to the ECJ's judgment.

QUESTION 3: DO YOU AGREE WITH THE PROPOSAL TO GIVE EFFECT TO THE WASTE HIERARCHY (A) BY UPDATING PPS10 IN ENGLAND AND TAN21 IN WALES; AND (B) THROUGH SPATIAL PLANNING WHICH WILL REQUIRE WASTE DEVELOPMENT FRAMEWORKS (IN ENGLAND) AND THE LOCAL DEVELOPMENT PLANS AND REGIONAL WASTE PLANS (IN WALES) TO HAVE REGARD TO THE WASTE HIERARCHY? IF NOT, PLEASE GIVE REASONS TO SUPPORT YOUR ANSWER.

9. UKELA agrees that the proposal to update national planning policy (PPS10 in England and TAN21 in Wales) to reflect the waste hierarchy in Article 4 of the rWFD is an appropriate way to ensure that the principles of the rWFD are transposed for the purposes of spatial planning.
10. UKELA notes that there is a distinction between the requirements in Regulation 8(2)(a) of the draft Regulations for waste management plans to include a statement of policies to attain the objectives in Part 2 of Schedule 1 to the draft Regulations (which closely follow the wording of Article 16 of the rWFD) and reference to a planning authority having regard to Article 16 as amended by deletion of the reference to "best available techniques". UKELA considers that national planning policy should clarify the reason for the distinction so that local planning authorities are clear that the requirement to comply with Article 16 as a whole is outside the land use planning system (please also see UKELA's comments in respect of draft regulation 20 in paragraph 7(d) above). UKELA expects and assumes that this responsibility will ultimately lie with the Environment Agency as indicated in paragraphs 2.31 to 2.34 of the consultation document.
11. Article 16(3) of the rWFD provides that a network of waste management facilities shall be established to enable waste to be disposed of or recovered in one of the nearest appropriate installations by means of the most appropriate methods and technologies in order to ensure a high level of protection for the environment and public health. This principle of proximity (transposed in Paragraph 5(3) of Part 2 of Schedule 1 to the draft Regulations) has been

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considered in a number of planning decisions and UKELA considers that any national planning policy should take account of these decisions¹.

12. Article 4(2) of the rWFD provides that the waste hierarchy can be departed from when this is justified by life cycle thinking on the overall impacts of the generation and management of such waste. The “Consultation Draft Guidance on Applying the Waste Hierarchy” provides helpful background as to what waste management facilities are considered appropriate as departures from the hierarchy and makes particular reference to anaerobic digestion (Section 2.1 on page 10). UKELA considers that regulation 8 of the draft Regulations should make specific reference to the content of waste management plans having reference to Article 4(2) of the rWFD and also that PPS10 and TAN21 should incorporate comments on the lifecycle referred to in Article 4(2), to demonstrate that factors such as protection of resources, technical feasibility, economic viability and the protection of the environment and human health (as provided for in Article 1) are factors that should be taken into account when considering whether there should be a departure from the waste hierarchy. UKELA considers that without this clarity planning authorities may misdirect themselves as to how to incorporate the rWFD into regional plans.
13. As the Government is promoting anaerobic digestion (Section 2.4 of the “Consultation Draft Guidance on Applying the Waste Hierarchy”) planning policy should explain the position of this technology in the waste hierarchy. For example, is a different position in the hierarchy afforded for anaerobic digestion which produces digestate with the potential to meet PAS110 and incorporates energy recovery over anaerobic digestion which produces a digestate with no appreciable benefits, or are these minor distinctions that can be elevated up the waste hierarchy by application of the life cycle considerations?

QUESTION 4: DO YOU AGREE WITH THE PROPOSALS IN RESPECT OF EACH OF THE CATEGORIES OF PERMITS/EXEMPTIONS DESCRIBED AT (A) TO (C) ABOVE? ARE THE ASSUMPTIONS MADE ABOUT COSTS REASONABLE (PLEASE SEE THE ACCOMPANYING IMPACT ASSESSMENT FOR MORE DETAILS). PLEASE GIVE REASONS OR ALTERNATIVE DATA TO SUPPORT YOUR ANSWER.

14. UKELA repeats its assertion made in its response to the Stage One Consultation that the application of the waste hierarchy by waste producers will necessarily determine the nature of the treatment operation to which waste is subjected.
15. As regards the generation of waste by waste operations, UKELA suggests that the waste hierarchy needs to be considered both in the planning consent process and in the permitting process. As cases such as Harrison v Secretary of State for Communities and Local Government² indicate, the boundary between the planning and permitting regimes is not always easy to identify, so the hierarchy should be considered in both. The planning consent process will consider whether a waste treatment facility is appropriate in the context of the hierarchy (for example, is there a need for that type of facility), whereas the permitting process will consider whether the operations to be carried on by the proposed facility can be

¹ Appeal reference APP/Z0645/A/07/2059609 Ince Marshes, Cheshire paragraph 11.125
Appeal reference APP/W2275/A/09/2101443 Blaise Farm Quarry paragraphs 17 to 27
Appeal reference APP/Q3060/A/08/2063129 Cattle Market Road, paragraphs 235 to 238

² [2009] EWHC 3382 (Admin)

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carried out in such a manner as to minimise the generation of waste and so as to ensure that any waste generated is itself treated in accordance with the hierarchy.

16. If environmental permits for waste treatment facilities are to include a condition of the type suggested in (b) on page 17 of the consultation document, UKELA suggests that guidance is needed on how to comply with such a condition. UKELA does not believe that the "Consultation Draft Guidance on Applying the Waste Hierarchy" is the appropriate place for such guidance and suggests that guidance be included in the relevant environmental permitting guidance for waste treatment facilities.
17. UKELA has no comments on the assumptions made about costs.

QUESTION 5: DO YOU AGREE WITH THE PROPOSAL TO GIVE EFFECT TO THE WASTE HIERARCHY, AND ARTICLE 15(1) OF THE RWFD, BY ADDING A DECLARATION TO THE DUTY OF CARE WASTE TRANSFER NOTE, SO THAT WASTE HOLDERS AND PRODUCERS ETC. ARE REQUIRED MAKE A SHORT STANDARD DECLARATION ON THE TRANSFER NOTE CERTIFYING THEY HAVE TAKEN THE WASTE HIERARCHY INTO ACCOUNT IN MINIMISING WASTE AND IN THEIR DECISION ABOUT THE TREATMENT WHICH THE WASTE IS BEING CONSIGNED TO, HAVING HAD REGARD TO THE GUIDANCE FOR ENGLAND, OR SECTOR PLAN(S) FOR WALES? (NOTE: THE REQUIREMENT WILL NOT APPLY TO HOUSEHOLDERS AND HOUSEHOLD WASTE PRODUCED ON THEIR PROPERTY.)

ARE THE ASSUMPTIONS MADE ABOUT COSTS REASONABLE (PLEASE SEE THE ACCOMPANYING IMPACT ASSESSMENT FOR MORE DETAILS)? PLEASE GIVE REASONS OR ALTERNATIVE DATA TO SUPPORT YOUR ANSWER.

18. Although UKELA accepts that option (b) as outlined in paragraphs 2.43 to 2.46 of the consultation document is a better option than option (a) as outlined in paragraphs 2.40 to 2.42, UKELA does not see what the proposed declaration will achieve, other than possibly inducing some waste holders and producers to make enquiries of those taking their waste about the destination of that waste. Whilst it is appreciated that the waste hierarchy commences with "prevention", from a waste management perspective prevention has no application, since it is beyond the ability of those involved in the industry to prevent the creation of waste. The duty to take into account the waste hierarchy seems to be a more appropriate duty for public authorities in the exercise of their planning and permitting functions rather than for waste holders and producers. For most waste holders and producers, waste minimisation and decisions about the treatment to which their waste is consigned are determined by economic factors and not the waste hierarchy – in most cases a waste holder or producer will normally choose the cheapest treatment option rather than that which lies higher in the waste hierarchy. Also, in many cases the holder or producer may have no knowledge of the treatment to which their waste is to be consigned. Moreover, a holder of waste may have no knowledge as to whether that waste has previously been subjected to treatment before it comes into its hands.
19. UKELA also has concerns about the enforceability of the proposed declaration. How do Defra/WAG propose that waste holders and producers demonstrate that what they are certifying in the declaration is in fact true? Will holders and producers be expected to keep an 'audit trail' or 'evidence pack' of decisions about treatment options? If a waste holder or producer cannot produce evidence that it has taken into account the waste hierarchy in

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minimising waste and in making decisions about waste treatment options, UKELA believes that this could be sufficient evidence for a competent authority to take enforcement action. Guidance on this issue is therefore required as a priority (please also see the comments in paragraph 24 below).

20. UKELA has no comments on the assumptions made about costs.

QUESTION 6: DO YOU AGREE WITH THE LEGISLATIVE PROPOSALS UNDERPINNING THE GUIDANCE IN ENGLAND AND WALES ON THE APPLICATION OF THE WASTE HIERARCHY?

21. New sub-section 2E inserted into Section 34 of the Environmental Protection Act 1990 requires a person discharging his legal duty in new sub-section 2B to have regard to the guidance produced by Defra on applying the waste hierarchy. Where the reasons for departing from the hierarchy apply, there is no guidance, but just a note that these considerations are not covered and will be determined on a case-by-case basis. UKELA suggests that it would be helpful for Defra to consider plugging this gap in the guidance on these "other" environmental considerations (such as sustainability, technical feasibility and economic viability), which may represent the best environmental option and justify a departure from the hierarchy, as a lack of clarity could lead to confusion on how to discharge the legal duty imposed by sub-section 2B.
22. UKELA is also concerned that it is not clear how the legal duty in sub-section 2B is to be discharged in respect of those waste streams for which the guidance on applying the waste hierarchy advocates a departure from the waste hierarchy, namely food and green (garden) waste. Will an operator choosing to treat such waste in strict accordance with the waste hierarchy (i.e. putting composting above anaerobic digestion) rather than in accordance with the guidance (which puts anaerobic digestion above composting) face enforcement action? UKELA cannot see that the guidance can take precedence over the provisions of Article 4 of the rWFD, or that a court could afford the guidance the same status as legislation.

QUESTION 7: (ENGLAND ONLY): WHAT ARE YOUR VIEWS ON THE DRAFT GUIDANCE ON THE APPLICATION OF THE WASTE HIERARCHY IN CHAPTER 4 OF THIS CONSULTATION PAPER? IN PARTICULAR, WHAT ARE YOUR VIEWS ON:-

- i WHETHER IT COVERS THE RIGHT WASTE STREAMS;
 - i WHETHER AND HOW IT COULD BE MADE EASIER TO READ AND USE;
 - i THE SUBSTANCE OF THE GUIDANCE; AND
 - i THE WAY SECTION 2 OF PART 2 (**SWITCHING TO BETTER OPTIONS: IDEAS AND SOURCES OF SUPPORT**) IS ORGANISED. WOULD USERS PREFER TO HAVE IT LAID OUT BY MATERIAL (SO IT GOES THROUGH THE STEPS OF THE HIERARCHY FOR EACH MATERIAL IN TURN), OR THE WAY IT IS NOW, WHICH IS DESIGNED TO ALLOW USERS TO LOOK AT THE SAME ACTIVITY FOR SEVERAL MATERIALS AT A TIME?
23. As already mentioned in paragraph 19 above, if Defra intend to proceed with adding a declaration to the duty of care waste transfer note along the lines set out in Question 6, then guidance is required to assist waste producers and holders and others involved in applying the waste hierarchy. UKELA notes that any such guidance will need to be relevant to and usable by a broad range of organisations, from construction companies producing large quantities of waste in different waste streams to small office-based businesses producing

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small amounts of waste similar in nature to waste produced by households. While this 'one size fits all' approach may be helpful from the perspective of providing uniformity, it is questionable whether the guidance is pitched at the right level for many organisations which need to have regard to it. UKELA notes that many of the reference documents are of a highly technical nature and hence will be incomprehensible to many waste producers without specialist advice.

24. UKELA suggests that the guidance should provide waste producers and holders with an indication of what evidence will be required to demonstrate that the producer/holder has taken the waste hierarchy into account. For example, will enforcing authorities expect to see an 'audit trail' recording how producers and holders have taken the waste hierarchy into account in minimising waste and in deciding on treatment options? UKELA is concerned that the lack of such an 'audit trail' will be taken by enforcing authorities as *prima facie* evidence of a failure to have had regard to the guidance, which could have serious legal consequences for those involved.
25. UKELA believes that the current structure of the guidance is logical, but hopes that it will be expanded in due course to cover more materials and products.
26. Please also see UKELA's comments in paragraphs 21 and 22 above.

QUESTION 8: DO YOU BELIEVE THAT:-

- A) CIVIL OFFENCES AND SANCTIONS AT THE LEVELS PROPOSED ARE APPROPRIATE IN RELATION TO THE PROVISIONS ON THE SEPARATE COLLECTION OF COMMERCIAL AND INDUSTRIAL WASTE; OR**
B) WOULD YOU PREFER TO SEE THE SEPARATE COLLECTION REQUIREMENT IMPLEMENTED AS A CONDITION IN THE WASTE CARRIER REGISTRATION AND PERMITTING REGIMES?

27. UKELA does not understand why Defra's/WAG's preferred option is option (a). Making it a condition of registration as a waste carrier to collect waste paper, metal, plastic and glass by way of separate collection where it would be technically, environmentally and economically practicable to do so, and an environmental permit condition not to mix separately collected waste, would provide enforcement bodies with a wider and more flexible range of penalties than civil sanctions alone if civil sanctions of the level proposed in paragraph 2.114 of the consultation document were introduced for breaches of the proposed condition. As stated in paragraph 2.115 of the consultation document, revocation of a registration would be a more severe penalty than a fixed monetary penalty or a variable monetary penalty, and a number of proportionate penalties would be available for breaches of the permit condition prohibiting the mixing of separately collected waste.
28. Although there is currently no requirement for those who "normally and regularly" transport their own waste to be registered as waste carriers (except for those transporting construction and demolition waste), as mentioned in paragraph 8 above UKELA notes that Defra/WAG intend to give effect to the ECJ's judgment in Case 270/03. A potential loophole for those collecting their own waste paper, metal, plastic and glass would therefore be closed.
29. UKELA also does not understand why private companies should be subject to civil sanctions, but not local authorities. The Local Government Ombudsman/Public Services

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Ombudsman complaints procedure is lengthy (since the complainant must first exhaust the local authority's own complaints procedure) and the Local Government Ombudsman/Public Services Ombudsman has no power to make a local authority take action. Judicial review is a costly procedure and does not allow the merits of decisions to be examined. In comparison, civil sanctions are supposed to provide a quick and cost-effective solution. Treating local authorities and private companies differently would also put local authority Direct Services Organisations (**DSOs**) at a competitive advantage over private sector waste collection contractors, as a DSO would not be subject to civil sanctions, but a private sector waste collection contractor contracted by a local authority would be. UKELA suggests that DSOs collecting waste should be subject to the same penalties as private sector waste collection contractors.

30. Without prejudice to the comments in paragraphs 27 to 29 above, if Defra/WAG do proceed with option (a) on the basis set out in the consultation document then UKELA wishes to draw their attention to a drafting error in the draft Regulations. Regulation 12(2) refers to the duty on waste collection authorities and regulation 12(3) refers to the duty on waste carriers; however, regulation 15(1) imposes civil sanctions for breaches of regulation 12(2) (i.e. the duty on waste collection authorities). There is no sanction provided for breaches of regulation 12(3) by waste carriers. The references in regulation 15(1) should therefore be to regulation 12(3) or 13(1), although UKELA's position is that the references should be to regulation 12(2), 12(3) or 13(1).

QUESTION 9: DO YOU CONSIDER THAT THE COSTS AND BENEFITS OF THE TRANSPOSITION AND IMPLEMENTATION OF THE PROVISIONS OF THE RWF D THAT ARE ADDRESSED IN THE IMPACT ASSESSMENT HAVE BEEN ACCURATELY ASSESSED? IF NOT, PLEASE PROVIDE WHATEVER EVIDENCE YOU CAN TO ENABLE A MORE ACCURATE ASSESSMENT TO BE MADE IN THE IMPACT ASSESSMENT THAT WILL ACCOMPANY THE POST-CONSULTATION DRAFT OF THE TRANSPOSING REGULATIONS THAT IS LAID BEFORE BOTH HOUSES OF PARLIAMENT AND THE WELSH ASSEMBLY GOVERNMENT.

31. UKELA has no comments on this question.

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