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Municipal Sector Plan Part 1

Towards Zero Waste
One Wales: One Planet

Post Adoption Statement for
the Sustainability Appraisal

March 2011

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1. Introduction

1.1 Background

This report forms the Post Adoption Statement (PAS) to accompany the final version of the Municipal Sector Plan (MSP) Part 1. The report fulfils the plan and programme adoption requirements of the European Directive on Strategic Environmental Assessment (SEA)¹, the Environmental Assessment of Plans and Programmes Regulations 2004² and WAG guidance³.

1.1.1 Municipal Sector Plan Part 1

The MSP is being produced to deliver aspects of Towards Zero Waste (TZW), the overarching waste strategy document for Wales. It forms part of a suite of documents called sector plans that together will make up the waste strategy for Wales. The MSP addresses municipal waste collected by local authorities from households, and from some businesses and public bodies and will detail the outcomes, policies and delivery actions for the sector.

The MSP is being split into two parts:

- i. **MSP Part 1** considers waste prevention, preparing for reuse, recycling collection service delivery improvements and sustainable treatment and disposal.
- ii. **MSP Part 2** will consider household hazardous waste (HHW), focussing on prevention, greater reuse and recycling, and reduction in the amount of HHW left in the residual fraction.

The four key areas of municipal waste included in the MSP Part 1 through which the targets set out in TZW will be achieved are:

- **Waste prevention** – *to reinforce the important role of Local Authorities engaging with householders and communities to reduce waste put out for collection, thus helping to meet*

¹ SEA can be seen as being focussed on the environment effects on a plan. By also explicitly considering economic and social effects a broader understanding of the sustainability effects of the MSP can be shown.

² S.I. 2004/1656 (W/170)) ("the Wales Regulations").

³ WAG et al (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

environmental outcomes, increasing opportunities for enhancing social wellbeing through waste reuse and reducing the costs of waste collection and management.

- **Preparing for reuse** – *to ensure that a far greater proportion of wastes collected by Local Authorities is “prepared for reuse”, in order to meet environmental outcomes, increase opportunities for enhancing social wellbeing through involvement in reuse activities and reduce the costs of waste management.*
- **Recycling collection service delivery improvements** – *to deliver sustainable development outcomes in a cost effective way and work towards the new municipal waste recycling targets set in Towards Zero Waste.*
- **Sustainable treatment and disposal** – *to deliver sustainable treatment and disposal of municipal waste in a cost effective way and work towards the targets set in Towards Zero Waste.*

Each of the four key areas of the MSP Part 1 is underpinned by a series of actions and sub-actions setting out measures to be implemented by the Welsh Assembly Government, local authorities and others to meet the Plan’s broader aims and objectives as well as those of TZW. These actions were taken forward for consideration as part of the Sustainability Appraisal (SA) process.

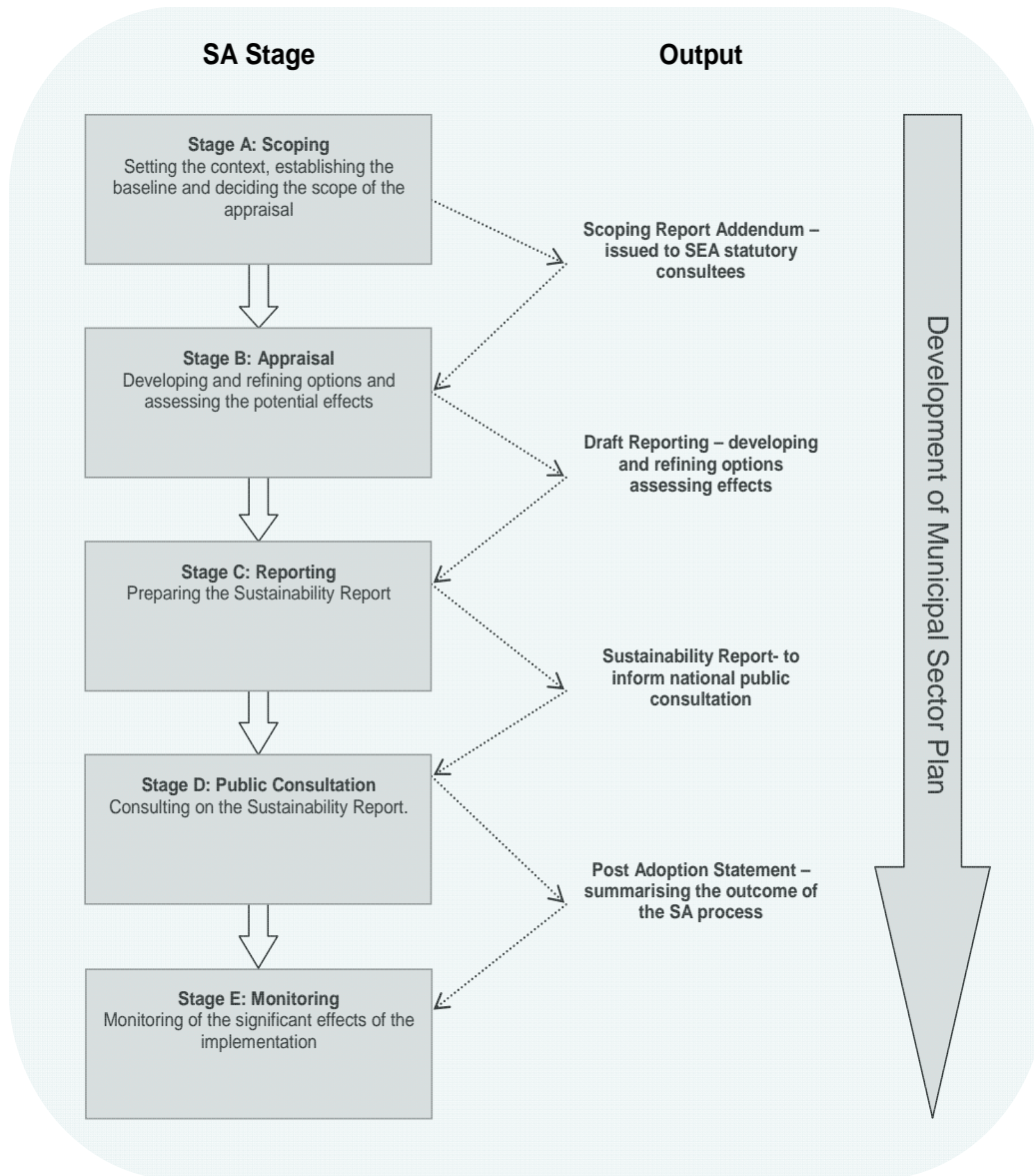
1.1.2 Sustainability Appraisal

The SA is an assessment of the economic, social and environmental sustainability of the MSP Part 1. The SA has been carried out in such a way that it is also compliant with the requirements of the European Directive on Strategic Environmental Assessment (SEA) and WAG guidance⁴ on how this should be applied to plans in Wales. Under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, SEA is mandatory for plans and programmes which are prepared for waste management **and** which *set the framework for future development consent* (normally conditions or criteria which guide the way a consenting authority decides an application) for projects which are listed in Annexes I and II of the Environmental Impact Assessment (EIA) Directive (85/337/EEC). The Welsh Assembly Government has committed to carrying out SA (incorporating SEA) in order to assess the sustainability effects of the MSP and to consider ways in which it can be made more sustainable. The SA also incorporated Health Impact Assessment (HIA) to ensure that the potential socio-economic and environmental health effects of the MSP could be considered in a holistic manner. The requirements of the Habitats Regulations with regard to the MSP were considered in the main Sustainability Report.

The SA process is made up of five key stages which are shown in **Figure 1.1**.

⁴ WAG et al (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

Figure 1.1 Key stages of the Sustainability Appraisal process



Stage D of the SA process included consultation on the Sustainability Report which took place alongside the draft MSP Part 1 from 21 June to 13 September 2010. The Sustainability Report presented the findings of the

assessment of 24 actions / sub-actions⁵ contained within the draft MSP Part 1 (stages B and C above) and had the following aims:

- to meet the Welsh Assembly Government's commitment for all sector plans to be subject to SA;
- to present a summary of relevant environmental, social and economic information in the context of existing plans and programmes, baseline information and consultees' views;
- to ensure that the likely significant environmental, social and economic effects of the draft MSP Part 1 are identified, characterised and appraised;
- to propose measures to mitigate the adverse effects identified and to enhance potential positive effects;
- to outline and describe the ways in which significant effects identified by the SA can be monitored; and
- to provide an opportunity for stakeholders to offer their views on the findings of the appraisal.

1.2 Purpose of the Post Adoption Statement and Compliance with the SEA Regulations

1.2.1 Purpose and structure of the Post Adoption Statement

This report includes information to fulfil the requirements of the SEA Regulations with respect to the Post Adoption Procedures (Part 4, Regulation 16 (4) of the SEA Regulations) and includes:

- how environmental (sustainability) considerations have been integrated into the final MSP Part 1 (**Section 2.1**);
- how the findings of the environmental report (the Sustainability Report) have been taken into account (**Section 2.2**);
- how the opinions expressed in response to the consultation on the Sustainability Report have been taken into account in preparing the final MSP Part 1 (**Section 2.3**);
- the reasons for choosing preferred options in light of the other reasonable alternatives (**Section 2.4**); and

⁵ Some actions were screened out of the assessment process. For further details, see Section 3.2 of the Sustainability Report.

- the measures that are to be taken to monitor any potential environmental effects of the implementation of the MSP Part 1 (**Section 3.1**).

1.2.2 Compliance with the SEA Regulations

Table 1.1 details the SEA Regulations requirements of the Post Adoption Procedures and indicates where relevant information required can be found in this report.

Table 1.1 Compliance of this report with the requirements of the SEA Regulations

SEA Regulations Requirement	Location in the Post Adoption Statement (where appropriate)
Information as to adoption of plan or programme (SEA regulation 16)	
<p>(1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall -</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and</p> <p>(b) take such steps as it considers appropriate to bring to the attention of the public</p> <ul style="list-style-type: none"> - (i) the title of the plan or programme; - (ii) the date on which it was adopted; - (iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained; - (iv) the times at which inspection may be made; and - (v) that inspection may be made free of charge. 	<p>A copy of the MSP Part 1 and accompanying reports and documentation is available at:</p> <p>www.wales.gov.uk/waste / www.cymru.gov.uk/gwastraff.</p> <p>A paper copy of the MSP Part 1, Sustainability Report and this Post Adoption Statement are available for public viewing at:</p> <p>Waste Strategy Branch Department for Environment, Sustainability and Housing Ty-Cambria 29, Newport Road Cardiff CF24 0TP</p> <p>The Welsh Assembly Government will inform the public of the Plan's adoption, together with details as required under (b) opposite, via the Welsh Assembly Government's website.</p>
<p>(2) As soon as reasonably practicable after the adoption of a plan or programme -</p> <p>(a) the responsible authority shall inform -</p> <ul style="list-style-type: none"> - (i) the consultation bodies; - (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and - (iii) where the responsible authority is not the National Assembly, the National Assembly; and 	<p>The Welsh Assembly Government, as the responsible authority, has indicated that it will inform the consultation bodies, public consultees and the Secretary of State by 31 March 2011 on the matters included in (3) below.</p> <p>This Post Adoption Statement addresses (iii) and contains particulars specified in paragraph (4) as outlined below.</p>

SEA Regulations Requirement	Location in the Post Adoption Statement (where appropriate)
<p>(b) the National Assembly must inform the Secretary of State, of the matters referred to in paragraph (3).</p> <p>(3) The matters are -</p> <p>(a) that the plan or programme has been adopted;</p> <p>(b) the date on which it was adopted; and</p> <p>(c) the address (which may include a website) at which a copy of -</p> <ul style="list-style-type: none"> - (i) the plan or programme, as adopted, - (ii) its accompanying environmental report, and - (iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained. 	
<p>(4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are -</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to -</p> <ul style="list-style-type: none"> - (i) the invitation referred to in regulation 13(2)(d); - (ii) action taken by the responsible authority in accordance with regulation 13(4), <p>- have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	<p>Section 2.1</p> <p>Section 2.2 and Appendix A</p> <p>Section 2.3 and appendices B and C</p> <p>Not applicable - no transboundary consultation with other EU Member States took place</p> <p>Section 2.4</p> <p>Section 3.1 and Appendix D</p>
Monitoring of implementation of plans and programmes (SEA regulation 17)	
<p>(1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p>	<p>Monitoring procedures are set out in Section 3.1 and Appendix D.</p> <p>The Welsh Assembly Government will identify effects and undertake remedial action (as necessary) as the MSP Part 1 is implemented.</p>
<p>(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).</p>	<p>The monitoring procedures set out in Section 3.1 and Appendix D will complement existing monitoring arrangements where possible.</p>

2. SEA and the Municipal Sector Plan Part 1

2.1 How environmental considerations have been integrated into the Municipal Sector Plan Part 1

2.1.1 Commitment to sustainable development

Sustainable development is the central organising principle of the Welsh Assembly Government and has formed the approach to the preparation of the MSP Part 1 from the outset. TZW and the MSP Part 1 align with the Assembly Government's Sustainable Development Scheme, 'One Wales: One Planet'. This is prepared under Section 79 of the Government of Wales Act 2006, which places on the Assembly Government a duty to promote sustainable development⁶. The MSP Part 1 promotes sustainable development in line with this duty and to support the obligations placed on local authorities (as Welsh improvement authorities) under the Local Government (Wales) Measure 2009. Section 2 of the Measure includes the requirement that local authorities must have regard to sustainability when seeking to improve the exercise of their functions. Other criteria that local authorities must have regard to are: strategic effectiveness; service quality; service availability; fairness; efficiency and innovation. These criteria are also addressed by the MSP Part 1.

In this context, the actions contained within the Plan are intended to help deliver the sustainable development outcomes identified in One Wales, One Planet and TZW.

2.1.2 On-going environmental assessment and evidence gathering

The MSP Part 1 builds upon a considerable body of work and evidence that has been subject to environmental appraisal. Most notably this has included:

- Future Directions papers;
- Regional Waste Plans; and
- TZW.

⁶ Section 79(1) of GOWA 2006 – 'The Welsh Ministers must make a scheme ("the sustainable development scheme") setting out how they propose, in the exercise of their functions, to promote sustainable development'

Future Directions

The first of a series of three 'Future Directions' papers was published for discussion with local government by the Welsh Assembly Government in 2007. These documents outlined proposals for future targets and approaches for the management of municipal waste collected by Local Authorities; they also presented the evidence base that guided the Welsh Assembly Government's preferred approach (especially for the 70% recycling target for 2024-25). Following a financial, environmental and feasibility appraisal, it was concluded that a minimum level of 70% recycling would be the most cost effective and deliverable level that should be. The 'Future Directions' papers have been debated and discussed in significant detail with Local Authorities and other stakeholders. As a result of these discussions, the second and third 'Future Directions' papers incorporated feedback from Local Authorities and other stakeholders.

Regional Waste Plans

Options for the management of residual waste were subject to SA/SEA and HIA and determined in the development of the Regional Waste Plans that sought to ensure that the planning process enabled the development of the appropriate infrastructure. The first review of the three Regional Waste Plans was completed in 2008 and the revised plans agreed by the Minister for Environment, Sustainability and Housing in 2009.

Towards Zero Waste

TZW builds upon the Future Directions papers and the Regional Waste Plans including the evidence base and sustainability appraisal work undertaken to support their development. TZW itself was informed by SA that incorporated the requirements of SEA.

2.1.3 Consultation with key stakeholders

Consultation has been integral to the development of the MSP Part 1 and in the SA process itself. Consultation has been undertaken with a range of environmental bodies and other key stakeholders which has helped ensure that environmental considerations have been identified and taken into account during the Plan's preparation.

Further details with respect to the consultation undertaken in support of the MSP Part 1 and the SA are provided in **Section 2.3** of this Statement.

2.1.4 Integration of Sustainability Appraisal and plan preparation

The SA process has been utilised to inform the ongoing development of the MSP Part 1. The aim of the SA process has been to identify the environmental and sustainability benefits and disbenefits of proposed actions to inform the development of the Plan.

A range of sustainability objectives and sub-objectives were used to identify key sustainability issues for consideration in the ongoing development of the Plan by assessing actions against these objectives. This SA Framework is shown in **Table 2.1**. Broadly, the SA objectives present the preferred sustainability outcome which usually involves minimising detrimental effects and the enhancement of positive effects where relevant. The sub-objectives were used to provide a detailed framework against which the draft MSP actions were assessed.

Table 2.1 SA Framework used to Assess Draft MSP Actions

Objective	Sub Objectives
<p>Waste Management</p> <p>To increase sustainable waste management and reduce Wales' Ecological Footprint</p>	<p>To raise awareness and understanding of sustainable waste reduction and management and encourage resource efficiency and sustainable consumption</p> <p>To increase infrastructural capacity and facilities for sustainable waste management</p> <p>To encourage behavioural change and participation amongst household, commercial and industrial operators</p> <p>To contribute to the reduction/minimisation of Wales' Ecological Footprint and progress self-sufficiency in waste management</p>
<p>Waste infrastructure</p> <p>To increase the infrastructure and facilities for sustainable waste management and the capacity of people to create and capitalise upon opportunities arising from this</p>	<p>To promote markets for recyclates and recycled goods</p> <p>To encourage the development and deployment of alternative waste technologies and R&D</p> <p>To encourage sustainable design of waste infrastructure and promote the development of the green technologies sector and sustainable procurement</p> <p>To promote equality of opportunity and access to local employment, training and upskilling and volunteering</p> <p>To support existing and develop new social enterprises focusing on waste as a community resource</p> <p>To provide cost-effective and reliable sustainable waste management</p>
<p>Landscape, biodiversity and cultural heritage</p> <p>To protect and enhance urban and rural landscapes and resources, including ecological services and functions</p>	<p>To protect designated landscapes: environmental, cultural and historic</p> <p>To protect and enhance biodiversity, geodiversity, flora and fauna including biodiversity and ecological connectivity</p> <p>To protect designated and undesignated historic assets and their settings, including listed buildings, scheduled ancient monuments, and historic parks and gardens</p> <p>To protect the character and visual identity of landscapes and townscape, including cultural and historic landscapes.</p> <p>To promote the use of brownfield land</p> <p>To ensure the provision of recycling facilities in all new developments and improve capacity in existing built infrastructure</p> <p>To remediate contaminated land</p>

Objective	Sub Objectives
Soil To protect and enhance soil resources	To protect against contamination of soil To conserve and treat source segregated organic waste for improving the quality of Welsh soils
Water To protect and promote the sustainable use of water resources	To promote sustainable flood risk management To protect and enhance groundwater and river quality in the inland, coastal and maritime environments
Air quality, noise and odour To protect and enhance air quality in local, regional and national context	To promote proximity of facilities to local settlements and sustainable transport modes/practices to serve such facilities with preference given to walking and cycling To minimise adverse impacts to air quality arising directly from facilities or transportation of materials to and from facilities To minimise adverse impacts to noise levels within communities To minimise odours arising from waste processing and its impact upon local communities
Climate change To assist with Wales' capacity to adapt to and mitigate against climatic change	To reduce greenhouse gas emissions To contribute to national, regional and local level carbon abatement strategy/objectives To promote the use of on site renewable energy and energy from waste where appropriate To be adaptable to predicted climate change effects including fluvial and marine flooding and extreme weather effects.
Health To protect and enhance the health and well-being of communities	To provide safe, secure, mechanisms for civic engagement To prevent the exposure of members of the public to hazards, noise and odour arising from waste To provide opportunities for those with health issues to gain suitable and meaningful employment To provide safe and healthy working environments for employees within the waste and recycling industries
Civic engagement To increase civic engagement in sustainable waste practice	To raise awareness and understanding of sustainable waste strategy, objectives and management To increase participation in more sustainable waste practice for all members of society, including socially disadvantaged groups and the poor. To increase accessibility to sustainable waste facilities and infrastructure and tackle physical and social barriers to engagement To support and provide opportunities for volunteering in the waste and recycling industries To ensure all promotional literature is published in Welsh as well as English where appropriate To provide community facilities, including visitor and educational centres.

The iterative nature of the plan preparation process has provided a number of opportunities for sustainability mitigation and enhancement measures identified during the SA to be taken into account within draft versions of the MSP Part 1. **Table 2.2** shows how the draft MSP Part 1 was amended to take these measures into account.

Table 2.2 How the draft MSP Part 1 was amended as part of the iterative SA process

Entec Comment	How Draft MSP was Amended	Section of Draft Plan Amended
Offer a commitment to retain or redeploy staff potentially affected by the MSP	New objective added to draft MSP: <i>The waste collection workforce is equipped with the necessary skills, qualifications and training to help support sustainable management of municipal waste (including appropriate re-training where the nature of the job changes).</i>	3.2.2 new specific objective 9 3.3.2 new specific objective 5 3.4.2 new specific objective 10
Offer a commitment to retain or redeploy staff potentially affected by the MSP.	Text added to draft MSP: <i>It is also important that waste collection staff have the necessary training when changes are made to the service.</i>	3.2.5.1 Action a) Service provision changes
Additional facilities should be designed to promote health and minimise any health effects on the local community.	Text added to draft MSP: <i>Local authorities need to take measures to influence and support appropriate and sanitary waste collection through the provision of guidance to householders, and enforcement action where necessary. Local authorities also need to undertake appropriate risk assessments and control measures for the potential impacts on the workforce of a reduced frequency of residual collection.</i>	3.2.5.1 Action c) Ensuring appropriate guidance given to protect health in respect of home composting and fortnightly collection
Investigate the increasing of fines to deter fly tipping.	Text added to draft MSP: <i>Local authorities need to also ensure appropriate enforcement action is taken to prevent increases in flytipping when fortnightly residual collections are introduced.</i>	3.2.5.1 Action c) Ensuring appropriate guidance given to protect health in respect of home composting and fortnightly collection
Ensure that enterprise makes community aware of its service to ensure reuse is undertaken and fly tipping is reduced	Text added to draft MSP: <i>Awareness campaigns can help to reduce the likelihood of flytipping, especially in relation to the relevant laws and penalties that apply.</i>	3.2.5.1 Action c) Ensuring appropriate guidance given to protect health in respect of home composting and fortnightly collection

2.2 How the Sustainability Report has been taken into account in the Municipal Sector Plan Part 1

The Sustainability Report and draft MSP Part 1 were developed in tandem enabling the Plan’s authors to consider the findings of the SA and make amendments to the Plan which was, in turn, then reassessed (as referred to in **Section 2.1.4** above).

A range of further measures were identified in the final Sustainability Report for consideration by the Welsh Assembly Government in developing the final version of the Plan. Several broad types of mitigation/enhancement measures were identified:

- providing employment and training opportunities, including, for example, a commitment to retrain staff potentially affected by anticipated changes to waste management practices and services;
- using potential additional capital generated as a result of the plan’s implementation for social enterprise schemes and waste management related research and development;
- running public awareness campaigns on a range of issues including health and safety;
- supporting community organisations to raise awareness and facilitate behavioural change;
- extensive targeting of businesses including developers to raise awareness of, and make provision for, sustainable waste management;
- promoting the sustainable and safe/healthy location of new facilities;
- facilitating the involvement of disadvantaged groups in sustainable waste management including through the provision of employment opportunities; and
- reducing the need to transport reuse items and recyclable wastes.

Appendix A groups the mitigation/enhancement measures identified for each individual action as appropriate and sets out how the Welsh Assembly Government has taken these into account in preparing the final MSP Part 1. It should be noted that some measures identified through the Sustainability Report have been removed on the basis that they are either a matter for local authorities or are already covered by existing planning policy/environmental permitting.

2.3 Consulting on the SA and Municipal Sector Plan Part 1

Consultation has been integral to the SA process and of the development of MSP Part 1. **Table 2.3** lists the formal consultations on the draft MSP Part 1 and SA together with the dates of the consultation and an overview of responses received.

Table 2.3 Formal SA and MSP Part 1 consultation undertaken

Consultation	Date of consultation	Consultation responses
MSP Stakeholder Event	16 February 2010	A broad spectrum of organisations were invited to attend the event and consider the scope of, and potential actions to be included in, the Municipal Sector Plan.
SA Scoping Report Addendum, which built on a SA Scoping Report previously prepared for TZW, was sent to statutory consultation bodies identified in the	13 April to 18 May 2010	Responses to the SA Scoping Report Addendum were received from:

Consultation	Date of consultation	Consultation responses
SEA Regulations for comment on the baseline information and assessment framework. Although the draft MSP relates solely to Wales, representatives from the English statutory consultees were also consulted as it was expected that they may be able to provide relevant baseline information or identify likely cross border impacts.		<ul style="list-style-type: none"> • Countryside Council for Wales • English Heritage • Environment Agency Wales • Natural England <p>Consultee comments received included requests for further baseline information, other plans to be reviewed and amendments to the appraisal framework. The comments raised in these responses (and the resulting actions) have been summarised in Appendix E of the Sustainability Report.</p>
Sustainability Report published on Welsh Assembly Government website alongside draft MSP Part 1 for comment.	21 June to 13 September 2010	<p>Detailed consultation responses were received from English Heritage and the Countryside Council for Wales (CCW). A summary of these responses and how they have been addressed by the Welsh Assembly Government is included at Appendix B of this Statement</p> <p>In addition to these detailed responses, Question 1 of the draft MSP Part 1 consultation document (see below) asked whether respondents agreed with the findings of the Sustainability Report. A total of 26 responses were received to this question from a variety of consultees. A summary of these responses and how they have been addressed by Welsh Assembly Government is included at Appendix C of this Statement.</p>
Draft MSP Part 1 published for comment.	21 June to 13 September 2010	<p>A total of 47 full written responses were received to the draft Plan. A further 4,237 responses and 16 petitions (comprising a total of 1,173 signatures) were received to Question 22 of the draft MSP Part 1 and, more specifically, the proposal that, in considering future funding of Local Authority services, kerbside sort collection will be promoted by the Welsh Assembly Government. A summary of responses received is available via the Welsh Assembly Government website www.wales.gov.uk/waste/ / www.cymru.gov.uk/gwastraff.</p>
Stakeholder workshops following the launch of the Draft MSP Part 1 consultation document.	12 July 2010 (Cardiff) and 14 July 2010 (Llandudno)	<p>A total of 56 participants attended the workshops, 31 at the Cardiff event and 25 at Llandudno. Summaries of the workshops is available via the Welsh Assembly Government website www.wales.gov.uk/waste/ / www.cymru.gov.uk/gwastraff.</p>

2.4 Justification for the adoption of the final Municipal Sector Plan Part 1

2.4.1 Alternatives considered

TZW considered the overall strategic alternatives for managing waste in Wales and it was not the purpose of the SA of the MSP Part 1 to re-assess the overarching strategy and targets set out in that document. Nevertheless, alternatives within the actions set out in the draft MSP Part 1 were considered that would still deliver the overall strategic targets.

The SA considered two alternative scenarios to the draft Plan: a do minimum and do maximum scenario based on information contained in the WRAP (2009) publication *Meeting the UK climate change challenge: The contribution of resource efficiency*. This document set out 13 key strategies relating to either supply side or demand side measures. Supply side measures tackle the efficiency of production or production structure in the UK. Demand side measures address the level of household consumption or composition of household products. These strategies were categorised into three different levels of intervention to indicate actions that would achieve ‘quick wins’ compared to those which would need to overcome significant investment, infrastructural, technological or cultural barriers. This constructed three scenarios made up of a range of supply and demand strategies to provide an insight into the effectiveness of a combination of measures, reflecting the workings of the economy as a whole, not just an adjustment of supply or demand side. Most of the strategies are included in all three of the scenarios but with differing levels of intervention. A Reference Scenario was also included in the document to act as a benchmark by which to compare the other scenarios, however as the reference scenario will not achieve the targets set out in TZW this was not assessed as a reasonable alternative.

The draft MSP Part 1 was considered to be similar to the best practice scenario set out in the report; the ‘do minimum’ alternative was based on the quick win scenarios (i.e. actions that can be completed relatively quickly and easily) set out in the report and the ‘do maximum’ alternative was based on the ‘beyond best practice’ scenarios it sets out.

The do minimum alternative was assessed as having a less positive outcome in terms of the waste management objective as it will concentrate only on the ‘quick wins’ for reducing food waste, product lifetime optimisation and other awareness campaigns. The do maximum alternative was assessed as having a more positive outcome in terms of the waste management objective as it will consider beyond best practice behavioural changes for reducing food waste, product lifetime optimisation and other awareness campaigns.

The do minimum alternative was assessed as having a less positive outcome in terms of waste infrastructure as it concentrated on ‘quick wins’ only and would not include actions to train / retrain the workforce. The do maximum alternative was assessed as having both positive and negative elements in terms of its effects on waste infrastructure as it will include ‘beyond best practice’ which will lead to more waste infrastructure being developed and potential to train / retrain the workforce but will result in a higher cost.

It was not anticipated that there would be significant differences between the alternatives in relation to landscape/biodiversity/cultural heritage, soil, water or air quality as both alternatives are likely to have positive effects as they will reduce the need for landfill but will also have the potential for negative effects depending on what additional waste infrastructure developments may be needed and their location.

For the do minimum alternative recyclates may not be retained in Wales because there will be less resource expended trying to develop new markets for the materials. This is likely to result in more emissions associated with transportation of recycled materials to markets outside Wales. In the case of the do maximum alternative it is likely that the market for more of the recyclates will be outside of Wales thereby resulting in more transport emissions however this may be offset by the reduction in embedded carbon and manufacturing emissions that will be avoided.

It was not anticipated that there would be significant differences between the alternatives in terms of health.

The do minimum alternative was assessed as having a less positive outcome in terms of civic engagement as it will concentrate on fewer 'quick win' awareness campaigns. The do maximum alternative was assessed as having a more positive outcome in terms of civic engagement as it will implement the WRAP 'beyond best practice' awareness campaigns.

2.4.2 Justification for Adoption of the final Plan

The SA process identified that the draft MSP Part 1 is expected to have significant positive cumulative effects on waste management as the primary focus of the Plan is to minimise waste. The emphasis of the MSP Part 1 on developing and delivering new waste recycling, composting and recovery facilities through a range of actions and initiatives should have significant positive cumulative effects on waste infrastructure.

In overall terms, likely positive cumulative effects on landscape/biodiversity/cultural heritage, water, air quality and soil were also identified as a result of the combined effects of the actions in reducing the amount of waste going to landfill with indirect effects resulting from a reduction in the environmental impacts associated with landfilling waste. In addition, greenhouse gas emissions from landfill will be reduced and encouraging local services and facilities for treating waste has the potential to reduce transport emissions, thereby resulting in a positive cumulative effect on the climate change. Positive effects on climate change are also likely to be generated from the anticipated reduction in greenhouse gas emissions related to the manufacture and transport of goods as people are encouraged to hire, reuse and maximise the lifetime of items rather than purchase new.

With respect to the health, the SA identified that the draft MSP would be likely to have a positive effect due to the reduction in landfill waste and associated odour, air quality and noise factors which can adversely affect people's health. A significantly positive effect on civic engagement was also identified due to the number of waste awareness actions and provision of local facilities set out in the draft MSP.

This plan represents the culmination of a long process of engagement with local authorities that was consolidated around the “Future Directions” discussion papers. The plan follows a path towards waste prevention and high recycling that was already laid out in Wise About Waste, and helps deliver the sustainable development outcomes in Towards Zero Waste. It also helps deliver the commitments made in One Wales, One Planet. In seeking to deliver a strong sustainable development approach the Plan also serves to meet, and exceed in some aspects, the minimum standards and targets set in EU Directives covering waste.

The broad aims of the plan were supported in the consultation, and the final consensual collaborative approach that has been followed in the final plan reflects the views expressed in some of the consultation responses.

Taking into account the findings of the Sustainability Report and the wide range of views given in response to the consultation which have been taken on board and the Plan amended as appropriate, the Welsh Assembly Government consider that the final MSP Part 1 is justified.

3. Next Steps

3.1 Monitoring

The Welsh Assembly Government is expected to monitor the socio-economic and environmental effects of the implementation of the actions contained within the MSP Part 1. The Sustainability Report identified a range of potential indicators that could be utilised for this purpose and having regard to responses received during the consultation process, this monitoring framework has been revised and is included at **Appendix D**.

This framework will sit alongside, and complement, the monitoring programme contained within Chapter 6 of the MSP Part 1 and is expected to be developed further as investigation into potential indicators and data sources is undertaken as part of the monitoring process.

3.2 Future Assessments

Further environmental assessment including SEA/SA will be undertaken as part of the development of subsequent sector plans including Part 2 of the MSP. Further details will be made available via the Welsh Assembly Government website in due course.

3.3 Availability of Documents

The final MSP Part as adopted will be available for viewing on line at www.wales.gov.uk/waste/ / www.cymru.gov.uk/gwastraff or in person at:

Waste Strategy Branch

Department for Environment, Sustainability and Housing

Ty-Cambria

29, Newport Road

Cardiff

CF24 0TP

Sustainability Report Mitigation and Enhancement Recommendations

Appendix A Sustainability Report Consultation Responses

Table A.1 How mitigation and enhancement measures identified within the Sustainability Report have been taken into account by the Welsh Assembly Government

Recommended mitigation in SA	How the Welsh Assembly Government has taken mitigation recommendations into account
Utilise some of the capital generated as a result of reduced residual waste management to support the development of social enterprises	It will not be possible to ring fence any specific savings for additional funding for social enterprises. The Welsh Assembly Government provides a variety of support packages for social enterprises.
Include a commitment to undertake training of volunteers including within the business community to support social enterprises/community waste solutions	The Welsh Assembly Government provides a variety of support packages for social enterprises, including those covering training.
Undertake specific campaigns with developers to raise awareness of waste reduction	This will be taken forward through the Construction and Demolition and Industrial and Commercial Sector Plans.
Co-ordinate training/prepare guidance specifically targeted at developers, setting out what measures they can take to reduce waste during the lifetime of a development. This may include, for example, accommodating kerbside sort and recycling/reuse facilities in new development.	This will be taken forward through the Construction and Demolition and Industrial and Commercial Sector Plans.
Consider holding awareness campaigns at existing community facilities/educational centres	This will be taken forward through the provision of best practice advice by the Waste Awareness Wales campaign. Waste Awareness Wales is developing campaigns taking a community based approach.
<p>With respect to home composting and fortnightly collection:</p> <ul style="list-style-type: none"> • explore a wide range of opportunities for the promotion of health and safety including, for example, demonstrations, web-based guidance, leaflets, and newspaper articles • hold health and safety awareness campaigns at existing community facilities/educational centres 	Local authorities are expected to provide relevant guidance for householders, including avoiding adverse impacts on health, especially those susceptible to breathing problems.
Set out the range of reuse facilities that may be appropriate at a community level	This will be considered in future.
Specifically target businesses to raise awareness of and encourage reuse	This will be taken forward as part of the Industrial and Commercial Sector Plan.
Support the implementation of community initiatives to encourage reuse and provide examples of what these might include and where they have been successful	The Welsh Assembly Government will continue to support community initiatives

Recommended mitigation in SA	How the Welsh Assembly Government has taken mitigation recommendations into account
Expand on the market study to examine potential facilities that could support reuse	This will be considered in future.
Include a commitment to examine the role of volunteers in supporting reuse initiatives	This will be considered in future.
Investigate the economic viability of rewarding of businesses and other sectors to reduce waste	The Welsh Assembly Government has commissioned a study to examine the need for further interventions to secure the greater waste prevention and recycling of business waste.
<p>Regarding Packaging Essential Requirements:</p> <ul style="list-style-type: none"> • ensure the regulations promote the use of packaging which has low carbon emissions in the process of its production and disposal / recycling • make the regulations stricter still • ensure regulations continue to have sustainable effects in the context of the wider waste management process • ensure tougher enforced Packaging Essential Requirements Regulations are accompanied by appropriate awareness raising measures 	The Welsh Assembly Government will, in due course, discuss this further with the other UK administrations.
Provide specific guidance and support for businesses and public sector bodies on waste prevention	This will be taken forward in the Industrial and Commercial Sector Plan.
Undertake education and awareness raising campaigns with businesses and public sector bodies on waste prevention and the associated cost benefits	This will be taken forward in the Industrial and Commercial Sector Plan.
Encourage the provision of recycling facilities within business and public sector buildings as a means of waste prevention	The Collection, Infrastructure and Markets Sector Plan contains a proposed action to start a "recycling on the go" initiative in Wales.
Promote of the benefits of hiring of equipment	WRAP will undertake this in Wales.
Ensure that companies providing leased equipment use sustainable products	WRAP will undertake this in Wales.
Ensure a demand for the newest products doesn't result in the discarding of 'out of date' products by lease companies due to changes in fashion etc (in a similar way that working electrical goods are discarded by households)	Companies leasing equipment (for example mobile phones) will be encouraged to find outlets for the reuse of older products. This already happens to a large extent for mobile phones.
Support the establishment of local lease services	WRAP will undertake this in Wales.
Conduct a carbon cost-benefit analysis of products which will potentially be reused to establish that it won't result in a long term net increase in carbon emissions	WRAP will undertake this in Wales.
Promote the benefits of eco design to consumers	<p>WAG is supporting the Eco Design Centre for wales.</p> <p>Waste Awareness Wales has enhanced its campaign to promote waste prevention (including the design of products) to consumers.</p>

Recommended mitigation in SA	How the Welsh Assembly Government has taken mitigation recommendations into account
Ensure planning policies support the expansion of civic amenity sites to improve facilities for reuse, subject to demonstrating no adverse effects on landscape, biodiversity and cultural heritage	This will be included for consideration in the revision of TAN 21.
Provide guidance to households and businesses (including manufacturers) on the types of materials that may in the long term produce more greenhouse gases than if they were recycled	Consideration will be given to this.
Promote careful planning of where waste is collected from to ensure when trips are made they pick up a number of items from the same area with a view to minimising greenhouse emissions caused by transportation	This is promoted in the Collection, Infrastructure and Markets sector Plan.
Provide commitment to recycle any goods that go through the reuse process and prove to be unwanted	The Landfill Tax is likely to incentivise the recycling of items that cannot be reused.
Promote best practice guidance with respect to civic amenity site design	This will be actioned.
Develop purpose built visitor or educational centres at larger scale waste facilities. These facilities could themselves be made from or equipped with reused materials and be used to deliver campaigns and further education to the community on reuse	This is encouraged.
As part of campaigns, provide information to ensure that reused items minimise any effects in terms of greenhouse gas emissions	This will be taken into account in campaigns to promote reuse.
Extend the national database to include details on any recycled services/markets	This will be considered.
Provide guidance in relation to recycling of items that have no reuse value	This will be considered. Waste Awareness Wales have considered this as part of their campaign development.
Provide guidance on the types of materials that may in the long term produce more greenhouse gases through reuse than if they were recycled	This will be considered
Consider how a requirement regarding items that should be recycled rather than reused can be incorporated as part of the accreditation scheme	This will be considered
Ensure that the public are aware of any items that are particularly unsuitable for continued reuse	This will be taken into account in campaigns to promote reuse. Waste Awareness Wales have considered this as part of their campaign development.
Ensure disadvantaged groups are proactively engaged in reuse projects	This is already encouraged.
Ensure that health and safety matters are reflected within the accreditation scheme	Health and safety matters are always taken into account by employers, as required by law.
Explore options for increasing infrastructure capacity that have low resource and planning impact e.g. shared or periodic use of community buildings and reuse of redundant buildings	This will be considered.
Explore the potential to procure new reuse facilities as a component of long term waste management contracts which secures finance and spreads costs	This will be considered.

Recommended mitigation in SA	How the Welsh Assembly Government has taken mitigation recommendations into account
Ensure that enterprises make the community aware of its service to ensure reuse is undertaken and fly tipping is reduced	This will be taken into account in campaigns to promote reuse.
Ensure that community enterprises do not bear the full cost of disposing of waste items delivered to them or collected for reuse that are unsuitable or surplus to requirements	This will be considered as part of the revision of the Controlled Waste Regulations.
Ensure greater consistency in recyclable materials collected also means an overall increase rather than reduction in collection services	All local authorities will be encouraged to increase the range of recyclable materials collected, beyond current best practice.
With respect to ensuring greater consistency in recyclable materials collected, include a requirement for local authorities to ensure that people with special requirements are given support and appropriate guidance and are not disadvantaged	Local authorities are encouraged to ensure service provision for those with special requirements, and all accommodate this in various ways.
Implement measures to encourage public take up of kerbside sorting (e.g. awareness raising campaigns)	This forms part of the Waste Awareness Wales campaign.
Ensure occupational health and safety procedures are revised to consider an increase in waste segregation at homes might result in changes to occupational health risk	This is the responsibility of the Health and Safety Executive.
Ensure collaborative approaches by local authorities manage waste close to its source	The Welsh Assembly Government actively encourages joint working by local authorities. It provides funding support for collaborative procurement of food and residual waste treatment. It is also looking to support collaborative approaches to recycle collection.
Use cost savings to invest in green technologies and waste research and development	The Welsh Assembly Government has a Green Jobs Strategy and intends to provide business support to the Energy and Environment Sector (that includes waste companies).
Make use of consolidated waste infrastructure rather than duplicating it in each local authority area where possible	This is encouraged, but is the responsibility of individual local authorities.
Ensure that efficiency practices do not reduce accessibility to recycling facilities	Both the Municipal Sector Plan and the Collections, Infrastructure and Markets Sector Plan stress the need for easy accessibility of recycling facilities.
Ensure Welsh industries are able to take advantage of waste streams, increased market activity and demand for additional EFW, composting and AD facilities	The Welsh Assembly Government has a Green Jobs Strategy and intends to provide business support to the Energy and Environment Sector (that includes waste companies).
Provide guidance related to the use of bottom ash to prevent any negative environmental effects	The Environment Agency and WRAP have instigated a project to examine whether a Quality Protocol can be developed for processed IBA. A Quality Protocol will only be developed if it can be demonstrated that processed IBA meeting the protocol will not cause harm to the environment or human health.
Ensure the adoption of appropriate technologies at new and existing facilities to reduce community exposure e.g. installation of appropriate pollution arrestment technology such as bio-filters and wet scrubbers	All appropriate waste facilities are regulated under the Environmental Permitting Regulations that are designed to protect human health and the environment from any significant adverse effects. This includes a requirement for the adoption of Best Available Techniques.
Taking into account the recommendations of the HIA prepared in support of TZW, consider amending the requirement for site specific risk assessments for large scale open facilities and to further develop bio-aerosol risk assessment methods to consider both the viable and non viable components of bio-aerosols	The Environment Agency keeps under review its permitting requirements for open windrow composting facilities, including in respect of monitoring and controlling the emissions of bio-aerosols.

Appendix B Draft MSP Part 1 Question 1 Responses

Table B.1 Sustainability Report consultee responses and Welsh Assembly Government action

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
English Heritage	General	Entec previously consulted English Heritage about the scope of the Sustainability Appraisal, and we were pleased to see that all our points have been taken into account.	Noted - no action necessary.
English Heritage	General	We advise the UK government on all aspects of the historic environment and its heritage assets in England, so would have an interest in proposals for waste infrastructure in Wales close to border areas. New structures might for example affect the setting of heritage assets, or lead to increased traffic flows.	Noted - no action necessary.
English Heritage	General	<p>While we note that your Sustainability Appraisal states (B11) that 'it is not considered that the actions in the draft MSP will lead to any direct effects on cultural heritage or assets in England' we feel that in B14 it does give more consideration to cross-border issues with respect to biodiversity ('Consideration of individual SSSIs in England should be made if waste infrastructure planning applications are made close to the border') than it does to cultural heritage.</p> <p>We would like to ask for a similar statement in the Sustainability Appraisal covering the need for consideration of cross-border historic environment issues with English planning authorities and where appropriate ourselves. We would suggest:</p> <p>'Consideration of the impact on heritage assets and the historic environment in England should take place if waste infrastructure planning applications are made close to the border, consulting the relevant English planning authorities and where appropriate English Heritage. Such impacts might include effects on the setting of heritage assets and the impact of the transport of waste and processed material.'</p>	The table referred to presents representations received to consultation on the Scoping Report Addendum and the Welsh Assembly Government's response only. It is considered that the actions contained within the MSP Part 1 will not have any direct effects on cultural heritage assets in England. However, it is agreed that consideration of the impact on heritage assets and the historic environment in England should take place if waste planning applications are made close to the border, consulting the relevant English planning authorities and where appropriate English Heritage. Such impacts might include effects on the setting of heritage assets and the impact of the transport of waste and processed material.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
CCW	General	In principle, CCW welcomes and supports the efforts made in undertaking this SEA process and notes the amendments made in order to mitigate against potential adverse effects on the environment. The overall finding of this assessment that the Municipal Waste Plan will have a cumulatively positive effect on the environment is noted and welcomed.	Noted - no action necessary.
CCW	HRA	<p>However, CCW retains some misgivings regarding process, particularly in respect of the HRA. In our response to the HRA of the Wales Waste Strategy (July 2009) CCW expressed strong reservations regarding the methodology used for the HRA and, in particular the proposal to rely on lower tier plans/projects to protect European Site integrity and the amalgamation of Habitats Directive habitats and features into generic categories.</p> <p>It is disappointing to note that the same methodologies have been repeated within this assessment for the Municipal Waste Plan i.e. that the HRA screening exercise for the Wales Waste Plan has effectively been transferred to this Municipal Waste Plan. CCW notes the statement that 'it is therefore not proposed to carry out a further HRA of this sector plan as the HRA on TZW is relevant to all those actions that promote waste management infrastructure that may impact on Natura 2000 or Ramsar Sites'.</p>	<p>Noted. The draft MSP Part 1 does not contain any spatial elements or significant new information regarding waste infrastructure and does not provide a framework for proposals to achieve planning consent. It was therefore not considered appropriate to carry out a further HRA of this sector plan as the HRA on TZW is relevant to all those actions that promote waste management infrastructure that may impact on Natura 2000 or Ramsar sites. As with the TZW HRA, it was not possible to conclude that there will be no likely significant effects on Natura 2000 or Ramsar sites from the draft MSP Part 1 due to the high level nature of the plan and the lack of any spatial detail. However, as both TZW and all of the Sector Plans will achieve overall positive environmental improvements it is more likely that overall there will be positive effects on Natura 2000 or Ramsar sites. Individual Natura 200 or Ramsar sites will be protected by the usual permitting and planning procedures carried out for waste sites.</p> <p>Consideration of whether to carry out HRA will be necessary for other sector plans that provide a framework for development.</p>
CCW	Non-Technical Summary (NTS)	CCW notes the reference to the MSP addressing municipal waste collected by local authorities from households, some businesses and public bodies. Clarification would be welcomed as to what is understood by 'some businesses'.	The occupiers of business premises may request a local authority to make arrangements to collect and dispose of the waste produced on those premises, under section 45 of the Environmental Protection Act 1990. The Local Authority levies a charge for such services.
CCW	NTS HRA	CCW also notes the reference to HRA being included within the main SA/SEA sustainability report. This is not a practice encouraged by government or CCW. The SEA and HRA processes have fundamentally different goals and methodologies and examine different aspects of our environment/natural heritage. CCW also notes that this SEA has incorporated SA and HRA within its environmental report. As stated in this section, care must be taken to ensure that the overall environmental report and appraisal process is fully compliant with the 'SEA' and Habitats Directives.	No action necessary - the Sustainability Report noted that no further HRA was carried out for the draft MSP Part 1. However, the findings of the TZW HRA were utilised to help inform the SA of the draft MSP Part 1 actions, particularly the landscape, biodiversity and cultural heritage objective.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
CCW	NTS Table NTS.1	<p>Objectives should be considered in the light of CCW's scoping response to this SEA (April 2010) and our scoping response to the Wales Waste Plan (October 2008).</p> <p>Although CCW notes and welcomes changes made to SEA objectives on landscape, biodiversity and cultural heritage and to climate change, it is disappointing to note that our previous comments regarding the need for soil objectives to incorporate soil function and processes, do not appear to have been considered.</p>	<p>The objectives and sub-objectives were reviewed in light of comments received from CCW and other stakeholders. It is envisaged that the objectives will be kept under review as part of the SA of future sector plans.</p> <p>Soil quality and contamination are included as sub objectives within the assessment framework and as a baseline topic in Appendix B of the Sustainability Report. However, as part of the SA of future sector plans, the Welsh Assembly Government will consider more detailed sub-objectives relating to soil function and processes in liaison with CCW.</p>
CCW	NTS Mitigation	<p>CCW notes the identification of a number of mitigation measures but is concerned that the great majority of these relate to social and/or economic factors. It should be noted that the objective of the SEA process is to provide for a high level of environmental protection and to contribute to the integration of environmental consideration into plans and programmes. CCW would therefore welcome the identification of more environmental mitigation measures and their explicit integration within the MSP itself.</p>	<p>No action necessary - it is considered that mitigation measures have been identified where appropriate. Many of these mitigation measures will have indirect benefits in relation to environmental protection including, for example, promoting the use of brownfield land, controlling noise and ensuring that environmental effects are considered in the development of planning policies to support the expansion/ development of waste management facilities. It should also be born in mind that the MSP Part 1 does not contain any spatial elements such that more detailed site specific mitigation measures could not be identified. It should also be borne in mind that delivering overall environmental improvement is one of the key goals of TZW and the Sector Plans; further, the plan also aims to meet the environmental protection objectives of the EU Waste Framework Directive.</p>
CCW	NTS Alternatives	<p>CCW notes with some concern, that only two alternatives (do minimum and do maximum) have been considered. No reference has been made to the 'business as usual' alternative i.e. 'the relevant aspects of the current state of the environment and likely evolution thereof without implementation of the plan', as required by the SEA Directive.</p> <p>The basis of alternatives derived from WRAP 2009-Meeting the UK climate change challenge- the contribution of resource efficiency, appears to only establish strategies based on supply/demand attributes. Further consideration would have been welcomed of alternatives based on best and most suitable environmental practice which, in the long term might also be the best option in terms of indirect social and economic costs.</p>	<p>No action necessary - the baseline presented in Appendix B of the Sustainability Report considers future trends which is utilised to identify key sustainability issues. The SEA Directive requires assessment of 'reasonable alternatives'. A 'business as usual' scenario was not assessed as a reasonable alternatives to the MSP Part 1 as this would not meet the targets set out in TZW or in EU legislation.</p> <p>The alternatives presented in the report also have the potential to realise considerable economic and social benefits, in addition to the supply/demand attributes stated. Many of the scenarios – in particular, lifetime optimisation, shift from goods to services and reducing food waste – also provide significant cost savings to citizens in Wales. The shift from goods to services scenario has the potential to generate more, skilled jobs in Wales and to stimulate local economies.</p>
CCW	NTS	CCW notes this assessment's finding that the Wales	Noted - no action necessary.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
	Conclusions	Municipal Waste Plan has the potential to have significant positive cumulative effects.	
CCW	NTS.4: Potential Indicators to monitor the effects of the Plan	<p>Landscape, biodiversity and cultural heritage</p> <p>With regard to the proposed monitoring of new waste infrastructure sites built within 'designated sites' (1a, 2a, 3a, 4a), clarification would be welcomed as to what is understood by designated in this instance. CCW would suggest that the development of waste infrastructure sites on internationally, nationally and locally designated sites of nature conservation interest would be unacceptable and it is would be expected and hoped that the Waste Plan itself would not condone or promote such development. See also comments of Air Quality monitoring below in respect of potential impacts on sensitive receiving environments. The potential for adverse effects on sensitive habitats and species is not restricted to physical loss of that habitat or species, indirect impacts e.g. from air/light emissions can also adversely affect sites of natural heritage value and compromise environmental functions.</p> <p>Similarly, with regard to proposed monitoring in terms of landscape (1b, 2b, 3a, 4a), CCW notes the proposal is to monitor sites only where applications have been objected to by statutory consultees on landscape grounds. The implication from this proposal is that waste disposal sites would 'proceed' in the face of objections from statutory consultees. CCW would suggest that the aim of the Plan itself would be to seek and encourage strategic planning and measures to avoid and mitigate potential landscape issues (and objections).</p> <p>CCW welcomes the consideration of BAP priority habitats and species but would also wish to see inclusion of ecological connectivity, natural heritage function etc within monitoring programmes.</p> <p>With regard to 5B, it should be noted that many 'brownfield sites' and buildings may have ecological interest and value in their own right.</p> <p>CCW would suggest that the monitoring proposals (6) in respect of recycling policies in development plans might be</p>	Noted. Indicator amended to refer to international, national and locally designated sites. It is generally considered that the indicator set is robust for the purposes of assessing the effects of the MSP and no further amendments with respect to landscape, biodiversity and cultural heritage have been made. Notwithstanding this, there may be an opportunity to explore additional indicators as part of subsequent sector plans.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		best located within the waste management section.	
CCW	NTS.4: Potential Indicators to monitor the effects of the Plan	Soil CCW welcomes the inclusion of monitoring proposals in respect of soil however, monitoring proposals in respect of soil function and services (percolation etc) would be welcomed. CCW is also disappointed that the 'value' of soils is only considered in terms of agricultural grade. Soils have value in their own right in terms of the habitats, species and functions they support and in terms of carbon capture etc. Organic soils and peats in particular, are especially worthy of protection and CCW would expect that the Plan would actively discourage waste development on peat and organic soil sites.	It is not clear how impact of the MSP on soil function and services could be monitored and it is considered that the indicator set is robust for the purposes of assessing the effects of the MSP and no further amendments with respect to soil have been made. Notwithstanding this, there may be an opportunity to explore additional indicators as part of subsequent sector plans.
CCW	NTS.4: Potential Indicators to monitor the effects of the Plan	Water See comments below on air quality and the sensitivity of receiving environments. Additional monitoring programmes need to be developed in respect of use of and impact on water resources.	It is not clear what additional indicators could be utilised to monitor the effects of the MSP on water resources and it is considered that the indicator set is robust for the purposes of assessing the effects of the MSP and no further amendments with respect to water have been made. Notwithstanding this, there may be an opportunity to explore additional indicators as part of subsequent sector plans.
CCW	NTS.4: Potential Indicators to monitor the effects of the Plan	Air Quality, Noise and Odour CCW welcomes the proposals for monitoring of air quality, noise and odour but would suggest the addition of additional items relating to 'tranquillity' (including light emissions) and in respect of transport of waste to disposal sites (distance, tonnage and emissions). In addition, in respect of air quality, consideration should be given to monitoring potential effects on sensitive receiving environments (not just AQMAs) including watercourses and water bodies, sensitive habitats etc.	Noted. The following additional indicators have been included within the proposed monitoring framework: 1d, 2d. Tonnage of waste transported to disposal sites 1e, 2e. Distance travelled by waste to disposal sites (although it will not be very feasible to monitor this in respect of private waste contractors). It is not clear what additional indicators could be utilised to monitor the effects of the MSP on tranquillity or receiving environments.
CCW	NTS.4: Potential Indicators to monitor the effects of the Plan	Climate Change CCW notes and welcomes the inclusion of monitoring on tonnage and proportion of waste transported by road/rail/water however, in terms of emissions, monitoring of distances travelled to disposal facilities would also be welcomed.	Noted. The following additional indicators has been included within the proposed monitoring framework: 1e, 2e. Distance travelled by waste to disposal sites

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
CCW	1.2	CCW welcomes and supports the undertaking of this assessment process	Noted - no action necessary.
CCW	1.3.1	CCW notes the reference to the MSP addressing municipal waste collected by local authorities from households, some businesses and public bodies. Clarification would be welcomed as to what is understood by 'some businesses'.	The occupiers of business premises may request a local authority to make arrangements to collect and dispose of the waste produced on those premises, under section 45 of the Environmental Protection Act 1990.
CCW	Box 1	Clarification would be welcomed as to whether hospital waste includes biologically 'contaminated' and/or low level radio active waste.	<p>Under Schedule 2 of The Controlled Waste Regulations 1992 local authorities have a duty to collect waste from residential premises associated with hospitals and they may charge for collecting this waste.</p> <p>Clinical wastes produced by hospitals, including biologically contaminated waste, and waste from laboratories is classed as industrial waste under Schedule 3 of The Controlled Waste Regulations 1992 and local authorities may arrange for this to be collected under section 45 of The Environmental Protection 1990 – at their own discretion.</p> <p>Radioactive wastes produced by hospitals come under a different regulatory regime and would not be included in local authority municipal wastes.</p>
CCW	Table 2.1	The Ramsar Convention (currently listed under Europe) should be listed under International Plans and Programmes.	Noted. This will be corrected in future sector plan SAs.
CCW	Table 2.1	<p>In terms of additional national policies, plans and programmes for review, reference should be made to the;</p> <ul style="list-style-type: none"> • Marine Strategy Framework Directive • Environmental Protection Act 1990 • Conservation of Habitats and Species Regulations 2010 • relevant Shoreline Management Plans • the Habitats Directive Review of Consents process in Wales • Technical Advice Note 15: Planning and Flood Risk • Relevant Water Resource Management Plans (Dwr Cymru, Severn Trent, United Utilities and Dee Valley 	<p>Noted. The Environmental Protection Act 1990 was reviewed as part of the review of plans and programmes. The following plans and programmes have not been taken forward for review for the reasons set out:</p> <ul style="list-style-type: none"> • River Basin Management Plans/ Catchment Flood Management Plans/ Water Resource Management Plans: the draft MSP is not spatially specific and as a result, it is not considered appropriate to review plans and programmes at this geographical scale. However, the SA framework includes a specific objective related to water resources and any potentially significant effects in relation to water quality, river processes and flood risk have been identified within the assessment matrices. • Habitats Directive Review of Consents Process in Wales: the draft MSP does not propose any physical development at specific locations. However, the SA framework includes a specific objective related to water resources and any potentially significant effects in relation to

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		<p>Water</p> <ul style="list-style-type: none"> • Relevant River Basin Management Plans (Severn, Western Wales, Dee) • National Park Management Plans in Wales • AONB Management Plans in Wales • Relevant Catchment Flood Management Plans in Wales • Register of Historic Landscapes in Wales • Wales Tranquil Areas Maps (2009 and 1997) 	<p>water quality have been identified within the assessment matrices.</p> <ul style="list-style-type: none"> • AONB/National Park Management Plans: the draft MSP is not spatially specific and as such it is not considered appropriate to review plans covering this geographical scale. However, the assessment framework includes a specific sub objective to protect designated landscapes and any potentially significant landscape issues have been identified within the assessment matrices. • Shoreline Management Plans: the draft MSP is not spatially specific and as such it is not considered appropriate to review plans covering this geographical scale. However, the assessment framework includes the sub objective to promote sustainable flood risk management and any potentially significant flood risk issues have been identified within the assessment matrices. • Tranquillity Maps for Wales: the draft MSP is not spatially specific such that the tranquillity maps are not considered relevant. Tranquillity has already been identified as part of the assessment framework sub objective to minimise adverse impacts to noise levels within communities. • Air Quality Action Plans/Local Air Quality Management Areas: the draft MSP is not spatially specific and as such it is not considered appropriate to review plans covering this geographical scale. However, the assessment framework includes a specific objective related to air quality and any such effects have been identified within the assessment matrices. • Register of Landscapes of Historic Interest in Wales: the register is not considered to be a plan or programme. However, the assessment framework includes specific sub objectives to protect designated landscapes and designated and undesignated historic assets and their settings, including listed buildings, scheduled ancient monuments, and historic parks and gardens. <p>The following plans and programmes are to be reviewed as part of future sector plan SAs as appropriate:</p> <ul style="list-style-type: none"> • Marine Strategy Framework Directive • Conservation of Habitats and Species Regulations 2010 • Technical Advice Note 15: Planning and Flood Risk

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
CCW	Plans & Programmes	CCW notes that whilst reference was made to the above within the 'additional Commentary on the Sustainability Appraisal (informal consultation with CCW June 2010), these plans and programmes do not appear to have been considered within this 'final' SEA.	Noted - see response above.
CCW	Objectives	CCW welcomes the additional key policy objectives and particularly welcomes the inclusion of additional policy objectives on climate change, air quality, water quality, the protection of bio and geodiversity etc.	Noted - no action necessary.
CCW	Table 2.2:	CCW notes that the Scope of Annex 1 issues and SA topics has a heavy emphasis on social and economic factors. CCW would suggest that care to be taken to ensure that, in concentrating on socio-economic factors, that the requirements of the SEA Directive (Annex 1) are fulfilled.	<p>No action necessary - the topics identified in Table 2.2 reflect those set out in Annex I of the SEA Directive and include the following environmental topics:</p> <ul style="list-style-type: none"> • Material Assets • Air Quality • Biodiversity and geodiversity • Water and flood risk • Landscape • Soil
CCW	Table 2.2:	CCW notes that no sub-topics were identified in respect of climate change. CCW would expect climate change issues to be considered both in the context of avoidance/mitigation of greenhouse gas emissions and reduction of contributions to climate change and consideration of adaptation/avoidance of climate change effects (resilience to climate change).	<p>No action necessary - the SA topics reflect those utilised within the TZW SA Report and were used to form the framework for the baseline review. Whilst no sub-topics were identified for climate change, the topic itself was considered as part of the baseline review. In this respect, the SA Framework includes a Climate Change objective which includes sub-objectives relating to climate change mitigation and adaptation.</p> <p>It should be noted that reducing the ecological and carbon footprint of waste is one of the key outcomes sought in TZW and the Sector Plans. Extensive ecological footprint and life cycle assessment modelling of different waste management options was carried out and the most beneficial waste management options in terms of reducing both the ecological and carbon footprints are the ones that have been identified as the preferred options. Both TZW and the Sector Plans will deliver significant greenhouse gas reductions associated with waste in Wales.</p> <p>Resilience to climate change will be covered in the Collections,</p>

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
			Infrastructure and Markets Sector Plan.
CCW	Table 2.2:	CCW notes that no consideration had been given within the Material Assets topic, to transport infrastructure.	No action necessary - transport is captured under the population, health and well being topic and was not, therefore, considered for inclusion under the Material Asset topic.
CCW	Table 2.2:	In respect of the Biodiversity and Geodiversity Topic, explanation would be welcomed as to the reasons for separating 'birds' from biodiversity and geodiversity. In respect of water and flood risk, consideration should be given to all freshwater bodies (not just rivers) and to coastal and marine issues.	No action necessary - this table identifies how SA topics were broken down into sub-topics to provide comparison with the baseline previously completed for the TZW SA Report and is used for comparison purposes only. The framework utilised to assess the actions contained within the draft MSP Part 1 does not separate birds from biodiversity and geodiversity and includes coastal and marine issues.
CCW	Table 2.3:	CCW notes that the identified 'key sustainability issues' have a heavy emphasis on social and economic matters.	No action necessary - it is considered that a number of environmental issues have been identified.
CCW	Table 2.3:	<p>Material Assets</p> <p>Consideration needs to be given to transport infrastructure issues in the context of waste management.</p> <p>CCW would also suggest that issues related to the strategic and 'sustainable' siting of waste facilities must be considered as an issue e.g. in respect to potential flood hazard, transport infrastructure, potential adverse effects on sites of natural and cultural heritage importance etc. CCW notes and, in principle supports the prioritisation of brownfield sites however, it should be noted that many brownfield sites have nature conservation and/or cultural interest in their own right and may not be suitable for re-development.</p>	<p>No action necessary - Table 2.3 sets out the key sustainability issues identified from the baseline review. It identifies the promotion of the sustainable transport of waste in terms of modes and services. The review of additional plans and programmes also identified that a key issues to be considered is the promotion of the transport hierarchy and the disposal of waste as close to its source as possible.</p> <p>Flood risk, transport, biodiversity and cultural heritage issues are identified. Whilst in some cases this may not explicitly refer to the siting of waste management facilities, the broader issues have been identified and informed the assessment framework.</p> <p>It is agreed that many brownfield sites will have nature conservation and/or cultural interest in their own right and may not be suitable for re-development. However, [the SA reflects the wider policy approach towards the preference for development of brownfield sites.</p>
CCW	Table 2.3:	<p>Air Quality</p> <p>CCW welcomes the consideration of air quality but notes no similar consideration of noise, odour, light pollution etc.</p> <p>In addition consideration should be given to air quality issues in respect of waste transport (distance, tonnage and emissions). In addition, in respect of air quality,</p>	Noted. This table identifies the key sustainability issues identified through the baseline review only. Air quality, noise, odour and light pollution have been captured within the assessment framework utilised to assess the actions contained within the draft MSP Part 1. However, further investigation into baseline data for air quality, noise, odour and light pollution will be undertaken as part of the SA of future sector plans as appropriate.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		<p>consideration should be given to potential effects on sensitive receiving environments including watercourses and water bodies, sensitive habitats etc.</p> <p>Air quality issues (including methane release etc) should also be considered in the context of climate change..</p>	
CCW	Table 2.3:	<p>Biodiversity and Geodiversity</p> <p>CCW notes that, despite the title of this section, no consideration has been given to geodiversity. In addition, the first issue (protect and enhance) effectively duplicates the third issue (protect the integrity of designated and non designated sites). CCW would also welcome consideration of ecological connectivity issues and of maintenance of ecological functions that support and sustain the natural heritage of Wales.</p>	<p>Noted. This table identifies the key sustainability issues identified through the baseline review only. In this respect, Appendix B of the Sustainability Report, which presents the baseline review, considers geodiversity. In addition, the protection and enhancement of geodiversity is identified as a sub-objective within the assessment framework. However, further investigation with respect to geodiversity and ecological connectivity will be undertaken as part of the SA of future sector plans as appropriate.</p>
CCW	Table 2.3:	<p>Water</p> <p>In respect of water, CCW notes and welcomes consideration of sustainable water consumption however, given the great pressures on water resources in Wales at present, and the likely changes in water resources as a result of climate change effects, CCW would suggest that consideration needs to be given to the availability of water resources in the long, medium and long term.</p> <p>Consideration should also be given on the implications of this plan on the coastal and marine water environments</p>	<p>Noted. The impact on water resources as a result of climate change is considered within the baseline contained within Appendix B of the Sustainability Report. The protection and promotion of the sustainable use of water resources also forms an objective within the assessment framework. Further investigation with respect to the availability of water resources will be undertaken as part of the SA of future sector plans as appropriate.</p> <p>Regarding coastal and marine environments, their protection and enhancement is a sub-objective within the assessment framework.</p>
CCW	Table 2.4	<p>Landscape, Biodiversity and Cultural Heritage</p> <p>CCW welcomes and supports the amendments made to objectives</p>	<p>Noted - no action necessary.</p>
CCW	Table 2.4	<p>Soil</p> <p>CCW supports the addition of an objective relating to remediation however, an additional objective relating to the need to maintain, protect and enhance soil function would be welcomed. Soils have value in their own right in terms of the habitats, species and functions they support and in terms of carbon capture, water storage and</p>	<p>Noted. Soil quality and contamination are included as sub objectives within the assessment framework and as a baseline topic in Appendix B of the Sustainability Report. However, as part of the SA of future sector plans the Welsh Assembly Government will consider more detailed sub-objectives relating to soil function and processes in liaison with CCW.</p>

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		percolation/filtration etc.	
CCW	Table 2.4	Water CCW welcomes the additional consideration of inland, coastal and maritime environments but would suggest that as currently written, this objective does not make much sense. An additional objective in respect of the need to protect, maintain and enhance water resources (in terms of quantity) would be supported.	Noted. This is an error and should read 'To protect and enhance groundwater and surface water quality in the inland, coastal and marine environments'. The assessment framework includes an objective to protect and promote the sustainable use of water resources which is considered to capture water quantity. However, the potential inclusion of an additional sub-objective in this respect will be considered as part of the SA of future sector plans as appropriate.
CCW	Table 2.4	Climate Change CCW welcomes and supports the additional objectives in respect of climate change adaptation.	Noted. No action necessary.
CCW	Table 2.5	While CCW supports the efforts made to undertake assessment of cumulative, synergistic and secondary effects, it should be noted that the SEA Directive (Annex 1f(i) requires consideration of secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. Clarification would be welcomed regarding the definition of secondary and cumulative effects as given in this Table.	No action necessary - it is considered that the definitions provided in Table 2.5 are sufficient. As set out in the text below Table 2.5, consideration has been given to the temporal nature of effects and within the assessments themselves the temporary or permanent nature of effects has been identified where appropriate.
CCW	2.5: Habitats Regulations Assessment	CCW notes that the HRA process has apparently been incorporated within the wider SEA environmental report for this MWP. This is not a practice encouraged by government or CCW. The SEA and HRA processes have fundamentally different goals and methodologies and examine different aspects of our environment/natural heritage.	No action necessary - the Sustainability Report noted that no further HRA was carried out for the draft MSP. However, the findings of the TZW HRA were utilised to help inform the SA assessment of the draft MSP actions, particularly the landscape, biodiversity and cultural heritage objective.
CCW	2.5: Habitats Regulations Assessment	With regard to the methodology used for HRA, see CCW response to the HRA of the Wales Waste Strategy (July 2009). In that response CCW expressed strong reservations regarding the methodology used for the HRA	Noted. The draft MSP Part 1 does not contain any spatial elements or significant new information regarding waste infrastructure and does not provide a framework for proposals to achieve planning consent. It was therefore not considered appropriate to carry out a further HRA of this

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		and, in particular the proposal to rely on lower tier plans/projects to protect European Site integrity and the amalgamation of Habitats Directive habitats and features into generic categories.	sector plan as the HRA on TZW is relevant to all those actions that promote waste management infrastructure that may impact on Natura 2000 or Ramsar sites. As with the TZW HRA it was not possible to conclude that there will be no likely significant effects on Natura 2000 or Ramsar sites from the draft MSP Part 1 due to the high level nature of the plan and the lack of any spatial detail. However, as both TZW and all of the Sector Plans will achieve overall positive environmental improvements it is more likely that overall there will be positive effects on Natura 2000 or Ramsar sites. Individual Natura 200 or Ramsar sites will be protected by the usual permitting and planning procedures carried out for waste sites. Consideration of whether to carry out HRA will be necessary for other sector plans that provide a framework for development.
CCW	2.5: Habitats Regulations Assessment	It is disappointing to note that the same methodologies have been repeated within this assessment for the Municipal Waste Plan i.e. that the HRA screening exercise for the Wales Waste Plan has effectively been transferred to this Municipal Waste Plan. CCW notes the statement that 'it is therefore not proposed to carry out a further HRA of this sector plan as the HRA on TZW is relevant to all those actions that promote waste management infrastructure that may impact on Natura 2000 or Ramsar Sites'.	See above.
CCW	3.1	See comments above on SEA objectives. CCW notes that treatment and disposal objectives (2 and 4) are considered to have a number of 'uncertain effects' e.g. on infrastructure, landscape, biodiversity and cultural heritage and air quality. It is also noted that the uncertainty related to the lack of knowledge regarding the nature, scale and location of possible development. See comments above on proposed monitoring.	Noted.
CCW	Table 3.2: Screening out of Draft MSP Actions for need for SA	3.4.5.1(i): Clarification would be welcomed as to whether the proposed Waste (Wales) Measure 2010 has been subject to Regulatory Impact Assessment.	Yes, a Regulatory Impact assessment is included in the Explanatory Memorandum for the Waste (Wales) Measure 2010
CCW	Table 3.2: Screening out of Draft MSP Actions for	3.4.5.2 (k): CCW notes that the forthcoming Collection, Infrastructure and Markets Sector Plan will be subject to SEA (and it is assumed HRA) processes. Clarification would be welcomed regarding any proposed timescale for	CCW were consulted at the scoping stage for the SA/SEA of the Collections, Infrastructure and Markets Sector Plan.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
	need for SA	this Plan and its relevant assessment.	
CCW	Table 3.3	CCW notes and welcomes the inclusion within this assessment process of proposals to include bottom ash within recycling targets.	Noted - no action necessary.
CCW	3.3.1	In general, CCW notes and supports the findings of this assessment with regard to Action 3.2.5.1(a). It should be noted that additional biodiversity benefits may result in respect of species using domestic composting systems e.g. slow worms.	Noted - no action necessary.
CCW	3.3.2	In general, CCW notes and supports the findings of this assessment with regard to Action 3.2.5.1(b).	Noted - no action necessary.
CCW	3.3.3	CCW would welcome the opportunity to input into guidance on composting towards enabling biodiversity benefits.	CCW are involved in the AD Digestate Market Development Group that is providing guidance.
CCW	3.3.4, 3.3.5, 3.3.6, 3.3.7 and 3.3.8	CCW notes and supports the findings of this assessment with regard to Actions 3.2.5.1(d-i).	Noted - no action necessary.
CCW	3.4.1	Clarification would be welcomed as to what is understood by 'promote the sensitive siting and management of reuse centres'.	This mitigation measure relates to the siting and management of reuse centres to avoid adverse impacts on human health (see assessment matrices contained within Appendix C of the Sustainability Report).
CCW	3.5.7	CCW notes the inclusion of 'bottom ash' within recycling (recovery) targets provided it is not classified as hazardous waste. Clarification would be welcomed regarding the premise of the 'potential to stimulate markets for bottom ash'. Similarly, fuller explanation would be welcomed regarding the statement that 'as a result of the inclusion of bottom ash within recycling targets, there will be less incentive to recycle other materials'.	<p>As set out within the assessment matrix contained within Appendix C of the Sustainability Report, it is envisaged that the inclusion of processed bottom ash meeting a Quality Protocol (if one can be developed) within recycling will stimulate the recovery of energy and materials value from residual waste.</p> <p>MSP Part 1 (3.4.4.1) states that the recycling of beach cleansing wastes, rubble (in small quantities brought into CA sites or HWRCs) and bottom ash from EfW plants will count towards Local Authority recycling targets from 2012-13.</p> <p>MSP Part 1 (3.4.4.1) specifies a minimum recycling and composting level for local authorities of 52% by 2012/13 rising to 58% in 2015/16, 64% in 2019/20 and 70% in 2024/25.</p> <p>The consequences of including processed EfW bottom ash in local authority recycling targets is a reduction in the required contribution from</p>

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
			other forms of recycling.
CCW	3.5.7	CCW notes the assessment's findings for the potential for negative effects of this proposal in respect of landscape, biodiversity, cultural heritage, soil and water. Clarification of the nature and potential magnitude of these negative effects would be welcomed within this section.	Further detail with respect to the nature and potential magnitude of these effects is provided in Appendix C of the Sustainability Report.
CCW	3.5.7	CCW notes and, in principle, welcomes the proposed mitigation measures but would welcome confirmation that the Municipal Waste Plan itself had had regard for this SEA's proposed mitigation measures and that they have been included within the revised Plan itself.	Information relating to how the mitigation measures set out in the Sustainability Report have been incorporated into the final MSP Part 1 is provided in Appendix A of this Post Adoption Statement.
CCW	3.5.7	CCW would suggest that the third proposed mitigation measure be strengthened to include the need for policies to demonstrate no adverse effect on soils (as well as biodiversity, landscape and cultural heritage). Clarification is also required as to how it is envisaged that planning policies will incorporate the proposed mitigation clauses.	<p>The addition of organic matter (meeting the relevant Quality Protocol for compost or AD digestate) to soils is likely to have far greater positive effects than adverse effects. The addition of organic waste to soil is controlled under the Environmental Permitting Regulations that are designed to prevent significant harm to health, the environment or living organisms. Organic wastes treated via composting or anaerobic digestion can be applied to land as a product if they meet the relevant Quality Protocols. These include standards that ensure no adverse effects on the soil. As with all fertilisers applied to soil, AD digestate and compost should be applied in accordance with relevant codes of practice.</p> <p>Preparation of planning policies to support development of EfW is a matter for local authorities.</p>
CCW	3.5.7	With regard to the 4th proposed mitigation measure, it should be noted that brownfield sites may have cultural heritage and biodiversity value in their own right.	Noted and agreed however, this measure reflects the wider policy approach towards the preference for development of brownfield sites.
CCW	3.5.7	Clarification would be welcomed regarding proposed criteria for 'sensitive siting' of EfW facilities.	This is a suggested mitigation measure for consideration by the Welsh Assembly Government only and is not intended to provide a detailed set of criteria for the sensitive siting of EfW facilities.
CCW	3.6.1	CCW would suggest that the third proposed mitigation measure be strengthened to include the need for policies to demonstrate no adverse effect on soils (as well as biodiversity, landscape and cultural heritage). Clarification is also required as to how it is envisaged that planning policies will incorporate the proposed mitigation clauses.	The addition of organic matter to soils is likely to have far greater positive effects than adverse effects. The addition of organic waste to soil is controlled under the Environmental Permitting Regulations that are designed to prevent significant harm to health, the environment or living organisms. Organic wastes treated via composting or anaerobic digestion can be applied to land as a product if they meet the relevant Quality Protocols. These include standards that ensure no adverse

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
			<p>effects on the soil. As with all fertilisers applied to soil, AD digestate and compost should be applied in accordance with relevant codes of practice.</p> <p>Landspreading of an organic waste and fertiliser is not controlled by the planning process. Preparation of planning policies to support development AD and composting facilities is a matter for local authorities.</p>
CCW	3.6.1	With regard to the fourth proposed mitigation measure, it should be noted that brownfield sites may have cultural heritage and biodiversity value in their own right.	Noted and agreed however, this measure reflects the wider policy approach towards the preference for development of brownfield sites.
CCW	3.6.1	Clarification is also required as to how it is envisaged that planning policies will incorporate the proposed mitigation clauses.	Preparation of planning policies to support development of AD and composting facilities is a matter for local authorities.
CCW	4.1	See comments above on Table 2.5.	Noted.
CCW	4.1	<p>CCW notes and welcomes this assessment's finding that there are likely (in the long term) to be positive cumulative effects in terms of landscape, biodiversity, cultural heritage, water, air quality and soil but would welcome further explanation of these findings, notably in respect of earlier findings relating to potential negative effects or uncertainty (see comments for example on 3.5.7 above) In particular, clarification would be welcomed regarding potential cumulative [effects?] generated from transport of waste from source to recycling/disposal facilities (including export) and potential cumulative effects on water quality and resources.. CCW notes the comments regarding positive cumulative effects on greenhouse gas emissions resulting from a decrease in landfill however, emission from existing landfill will continue for some time. Clarification would be welcomed as to whether the Municipal Waste Plan intends to address issues and environmental effects resulting from existing and/or redundant landfill and waste disposal sites.</p>	<p>This section of the Sustainability Report considers the cumulative effect of all of the actions contained within the draft MSP Part 1. The positive cumulative effects are likely to be predominantly generated by the reduction in amount of waste sent to landfill. Further detail in relation to the assessment of each individual action is provided in Appendix C of the Sustainability Report.</p> <p>With specific regard to the transportation of waste, the MSP Part 1 is expected to reduce total municipal waste and residual waste and encourage self sufficiency, thereby reducing the need for the transportation of waste. Further information is contained within the individual action assessments contained in Appendix C of the Sustainability Report.</p> <p>It should be noted that whilst there may be more transportation of recyclate, the additional GHG emissions are more than offset by the reduction in GHG emissions associated with replacing the use of virgin material by recycled materials.</p> <p>Regarding environmental effects resulting from existing and/or redundant landfill and waste disposal sites, this is outside the scope of the MSP.</p>

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
CCW	4.1	CCW also notes the intention to address cumulative issues relating to landscape, down to the LDP and planning consent process. Clarification is required as to how it is envisaged that Local Authority development plans will address issues raised and/or created via the Municipal Waste Plan.	Section 4.1 of the Sustainability Report sets out that there is some potential for local cumulative negative effects depending on the physical developments which lead from the actions set out in the draft MSP with other developments on the ground, e.g. the cumulative effect of a waste infrastructure development with a housing or employment development may detract from the setting of a Listed Building or the landscape value of an Area of Outstanding Natural Beauty (AONB). Given that the MSP Part 1 is not spatially specific it has not been possible to identify where some effects may arise. The Regional Waste Plans and LDPs set the detailed spatial policy framework against which site specific planning applications for new waste infrastructure will be assessed. These policies are required to take full account of relevant policies and interests and are subject to a separate SA process. Cumulative effects will be assessed as part of the LDP and during the planning application process.
CCW	4.2	CCW notes that only two alternatives (do minimum and do maximum) have been considered. No reference has been made to the 'business as usual' alternative i.e. 'the relevant aspects of the current state of the environment and likely evolution thereof without implementation of the plan', as required by the SEA Directive.	No action necessary - the baseline presented in Appendix B of the Sustainability Report considers future trends which are utilised to identify key sustainability issues. The SEA Directive requires assessment of 'reasonable alternatives'. A 'business as usual' scenario was not assessed as a reasonable alternative to the MSP Part 1 as this would not meet the targets set out in TZW.
CCW	4.2	The basis of alternatives derived from WRAP 2009-Meeting the UK climate change challenge- the contribution of resource efficiency, appears to only establish strategies based on supply/demand attributes. Further consideration would have been welcomed of alternatives based on best and most suitable environmental practice which, in the long term might also be the best option in terms of indirect social and economic costs.	The alternatives presented in the report also have the potential to realise considerable economic and social benefits, in addition to the supply/demand attributes stated. Many of the scenarios – in particular, lifetime optimisation, shift from goods to services and reducing food waste – also provide significant cost savings to citizens in Wales. The shift from goods to services scenario has the potential to generate more, skilled jobs in Wales and to stimulate local economies.
CCW	Table 4.1	CCW notes the wide aspirational variation (30 and 70%) between a shift in market to service provision. Clarification would be welcomed.	This refers to a shift from goods to services which can include the leasing of items such as carpets, office furniture etc. This allows the useful lifetime of goods to be extended, hence contributing to waste reduction. It also enables products to be upgraded in part, again reducing waste. It also enables a greater degree of producer responsibility as the original producer (or retailer) still retains ownership of the product and hence has responsibility for ensuring that it is managed effectively at its end of life. This will help improve recycling levels. It is considered that moving from goods to services will result in considerable resource efficiency benefits.
CCW	Table 4.2	In respect of the climate change objective, CCW notes with	Noted - no action necessary.

Respondent	Section of SA Report	Respondent Comment	Welsh Assembly Government Action
		concern that both the 'do minimum' and 'do maximum' alternative require or assume export of recyclates resulting in increased transport emissions.	
CCW	5.2	See comments above on monitoring (NTS 4).	Noted - no action necessary.
CCW	Appendix A	See comments above on Table 2.1	Noted - no action necessary.
CCW	Appendix B	See comments above on Table 2.1.	Noted - no action necessary.
CCW	B1.5	CCW notes that no baseline information has been provided in respect of transport and transport infrastructure. Given that transport is an inherent part of waste infrastructure and also relevant in terms of climate change, biodiversity, water etc issues, this omission is unfortunate	Accessibility and transport is addressed under Population, Health and Well Being within Appendix B. The potential impact of actions on transport has also been considered within the assessment matrices contained within Appendix C. Effects on specific transport infrastructure assets could not be assessed as part of the SA process as the MSP Part 1 does not contain any spatially specific proposals.
CCW	B1.6	Additional baseline information in respect of air quality and waste transportation would be welcomed	Noted. The provision of additional information in respect of air quality and waste transportation will be explored as part of the SA of future sector plans as appropriate.
CCW	B1.8.2	Clarification would be welcomed as to whether baseline information on water resources has taken into account the relevant Water Resource Management Plans of the 4 utilities companies operating in Wales and the Review of Consents process undertaken by EA in respect of river SACs.	Water Resource Management Plans and the Review of Consents process were not reviewed as part of the SA process but instead used data derived from State of the Environment Indicators and the Environment Agency.
CCW	B1.9	Reference should be made to areas included on the Register of Landscapes of Historic Interest in Wales (these areas are referred to in the landscape section)	No action necessary - landscapes of historic interest are referred to in Section B.19 of Appendix B of the Sustainability Report and identified geographically in Figure B.11.

Appendix C Draft MSP Question 1 responses and Welsh Assembly Government action

Table C.1 Draft MSP Question 1 responses and Welsh Assembly Government action

Respondent	Yes/No/Other	Response	Action
1. WLGA	Other	<p>1. The overall impression given by the SA is that the strategy will have a positive impact against the identified framework objectives. However, the methodology is arguably constrained by the assessment being limited to the direct actions within the Plan. It does not allow assessment of <i>indirect</i> effects which are just as important in terms of sustainable development.</p> <p>2. Significantly, there is no consideration of what impact the costs of the plan could have on services <i>other than</i> waste. If the increased cost of waste services squeezes other service budgets, this could result in a negative impact – e.g. if public health and/or countryside budgets were cut to help meet the costs of waste services, this could impact negatively on the health and/or biodiversity objectives (shown as likely to be positive in most cases). Likewise, traffic congestion that arises as a result of new waste collections could have an impact, especially in urban areas, on air quality. Equally there could be positive indirect effects such as changes in waste behaviour feeding into more environmentally conscious lifestyles.</p> <p>3. The assessment compares 'do nothing', 'best practice' and 'beyond best practice' options, with the MSP presented as the 'best practice' option. Interestingly, in its description of 'beyond best practice' it states: "For municipal recycling it is</p>	<p>1. No action necessary - the methodology adopted for the SA has been developed to ensure compliance with the requirements of the European Directive on SEA and the Environmental Assessment of Plans and Programmes Regulations 2005 (S.I. 2005/1656). In this respect, assessment of the actions contained within the MSP has considered secondary, cumulative and synergistic effects in accordance with Annex I of the SEA Directive.</p> <p>2. No action necessary. Increasing recycling rates and adopting best practice in respect of service delivery will save local authorities money that they can then use to positively benefit other services. Waste collection services can be managed to avoid traffic congestion.</p>

		assumed that this is sorted at kerbside such that recyclates are clean and suitable for reprocessing". Given WAG's emphasis on kerbside sort it is surprising that it appears in <i>beyond</i> best practice?	3. No action necessary - Table 4.1 of the Sustainability Report sets out the differences between the alternatives assessed. The assessment of these alternatives contained within Table 4.2 of the Sustainability Report takes into account these differences but notes that, in undertaking the assessment, it has been assumed that the Do Maximum Alternative also includes kerbside sort
2. Welsh Audit Office	Yes	1. We agree with the broad findings and conclusions of the sustainability appraisal regarding waste management. Consideration should however be given to the market influences and value for money upon such areas as re-use and to developing effective proven (evidence based) communications and awareness raising actions.	1. As further actions for reuse are considered in the future, due account will be taken of the economic viability of reuse operations, within the overall evaluation of sustainable development benefits. The Waste Awareness Wales campaign searches out and uses best practice in its approaches to behaviour change campaigns.
3. Vale of Glamorgan	Yes	1. I would agree that in general the findings of the sustainability appraisal appear to suggest that the strategy will have a positive impact against the framework objectives outlined. However, it is reliant on considerable monitoring and considers municipal waste management in isolation over the vast range of services that local authorities need to provide to its customers. It is an ideal vision of the way that WAG forecasts service delivery and ignores the cross functional budget and resource provision that local authorities have to consider in meeting customer demands.	1. No action necessary. . Increasing recycling rates and adopting best practice in respect of service delivery will save local authorities money that they can then use to positively benefit other services. The Sustainable Waste Management Grant does provide local authorities with the revenue required to implement the recycling services that are advocated in the MSP Part 1. The Welsh Assembly Government also provides the Regional Capital Access Fund to assist with Capital procurement. Therefore, the preferred methods specified in the draft MSP Part 1 do have their own funding arrangements.
4. Torfaen County Borough Council	Yes	No comments given.	No action necessary.

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5. City and County of Swansea	Yes	1. The authority broadly supports the findings and conclusions of the Sustainability Appraisal and feels that overall it will have a beneficial impact on the objectives identified.	1. Noted - no action necessary.
6. Enfys Foundation	Yes	1. I'm generally in agreement with the findings, though I can't say its an absolute agreement. To explain minutely, I don't believe would influence this response at this stage.	1. Noted - no action necessary.
7. Recoval Ltd	Yes	Yes but I think it misses some points. The Sustainability Appraisal is an intelligent document which asks most of the right questions and goes beyond immediate, visible impacts and looks at more than what are normally considered waste issues. The Municipal Sector Plan takes a comprehensive perspective, by highlighting embedded energy and points to the importance of waste prevention in these terms. The indicators proposed in the Sustainability Appraisal seem to stop short of this. To calculate the contribution of each local authority to Wales coming within its sustainable ecological limits the most important expression of energy consumption is net direct and indirect GHG emissions. This takes the indirect emissions from embedded energy of all products discarded as waste (inc recycling/composting) plus any indirect emissions in their collection and treatment (construction of facilities, manufacture of plant and vehicles etc) plus the direct emissions from BMW, offset by savings achieved through recycling. This is a sophisticated measure for which uniformity and clear guidance is required, but is more meaningful than indicators on % diversion and overall recycling weights, which incentivise capture of heavy materials and inappropriate targeting of green waste which doesn't necessarily need collecting, at the expense of more significant materials and markets. The kg waste per head indicator is useful, the kg residual per household should surely also be per head, but is useful in either case. Overall the indicators ignore differences between environmental impacts of material extraction and manufacture, which can only be partially offset by recycling.	At the present time it is not feasible to apply an ecological footprint measure down to individual local authorities, although it is agreed that this would be desirable. This matter will be given further consideration. Noted. Indicator 4b amended to Residual household waste collected per head. The revised framework is set out in Appendix D of this Post Adoption Statement.
8. Newport Council	Other	1. Whilst there is an argument that the sustainability appraisal meets environmental sustainability, and even possibly, financial sustainability, it nevertheless misses the mark on some elements of social sustainability. 2. Whatever the motivations of Householders with no rear access to their properties and no front gardens, finding space for the number of containers needed to participate in source segregated collections is not generally possible, thus making full participation exceedingly difficult to say the least. Similarly, for flats with shared refuse/recycling facilities; there are considerable system issues	1. No action necessary - the assessment framework is considered robust for the purposes of the assessment. It includes specific objectives and sub-objectives which have been used to assess the social impact of the draft MSP Part 1. These include, for example, sub-objectives relating to education and awareness, health,

		<p>with source segregated collections which thus mitigate against high recycling rates. Whilst it may be possible to ensure through Building Regulation, that all new Town Houses and Flats are built with suitable provision, it will be decades before existing properties are superseded. It may very well be possible and reasonable to convince those who can cope, with say six separate containers to recycle; the same is not true for those who cannot. To this extent, the Sector Plan cannot be seen to be sustainable in a social sense and needs to recognise that one size does not [fit?] all.</p>	<p>employment and accessibility.</p> <p>2. The SA was based on a review of the existing baseline generated for the Plan. The findings of research undertaken by the Welsh Assembly Government identified that the best approach to delivering the sustainable development outcomes set out in TZW is kerbside sort. Respondents have cited other research that arrives at different conclusions and WAG has also commissioned further research on this issue. The Assembly Government will publish its 'Collections Blueprint' at the same time as it publishes Part 1 of the Municipal Sector Plan. This will be based on all the evidence that has been collated, including the recent Eunomia analysis of six local authorities. The Assembly Government recognises this as a key issue for the Plan. The policy preference remains the use of kerbside sort approaches to kerbside recycling and it is considering how best to promote this within a collaborative framework with Welsh local government</p>
9. Resident	No	<p>1. I am backing Denbighshire C.C. with the Blue Box scheme which is CUSTOMER FRIENDLY. I have been round various schemes, in other counties and this is the most convenient and cleanest I have seen. There is nothing to attract the seagulls, nothing to blow down the road and nothing left for householders to pick up after the waste has been removed. To go back to boxes, good as they were at the time would be going back in time. DONT FORGET WHO PAY THE COUNCILS WAGES.</p>	<p>1. No action necessary - this comment does not directly relate to the Sustainability Report and has been addressed as part of the preparation of the final MSP Part 1.</p>

10. Merthyr Council	Other	<ol style="list-style-type: none"> 1. Sustainable development must consider the impact of changes both now and into the future and must consider the implications for matters such as the delivery of other essential services. Whilst this SA has only been lightly scanned by officers of this authority, reassurance is needed that whilst emphasising the case for waste management it has carefully considered and does not compromise the delivery of other functions such as traffic management for example. If new collection rounds are to be devised between 2 authorities say on a shared services basis, will enough weighting be given in the SA to traffic management and other peripheral issues or is there a bias toward waste issues only? 2. The point is that the SA must ensure the bigger picture is looked at together with cost balancing between all functions and services. 3. There is also concern over the environmental and sustainability implications of source segregated collections as opposed to co mingled collections. With the speed of co mingled being a major factor in Merthyr Council using this method, the environmental transport impact of both if measured should be looked at not in waste-miles but in waste-miles-hours. A Community Waste report June 2008 entitled Carbon Assessment of Comingled and Source Segregated Kerbside Recyclables Collection, (analysis carried out by Hyder) concludes as follows: The aim of the analysis was to compare the carbon emissions associated with the collection of co mingled recyclables with the collection of source segregated recyclables. This was done by calculating the carbon emissions per tonne of recycle collected in each case. The results based on initial assumptions indicated that carbon emissions from co mingled streams are 28% lower per tonne of material collected than from the source segregated stream. This indicates that co mingled carbon emissions are still consistently lower than source segregated emissions. 	<ol style="list-style-type: none"> 1. No action necessary - the framework developed to support the assessment of the MSP Part 1 comprises objectives relating to a range of sustainability topics which is considered to be sufficiently robust to assess the high level actions contained within the MSP Part 1. Ensuring fuel efficient collection rounds is part of normal good practice. 2. No action necessary. Increasing recycling rates and adopting best practice in respect of service delivery will save local authorities money that they can then use to positively benefit other services. The Sustainable Waste Management Grant does provide local authorities with the revenue required to implement the recycling services that are advocated in the MSP Part 1. The Welsh Assembly Government also provides the Regional Capital Access Fund to assist with Capital procurement. Therefore, the preferred methods specified in the draft MSP Part 1 do have their own funding arrangements. 3. No action necessary - the SA sought to reflect the findings of research undertaken by the Welsh Assembly Government which identified that the best approach to delivering the sustainable development outcomes set out in TZW is kerbside sort. The Assembly Government will publish its 'Collections Blueprint' at the same time as it publishes Part 1 of the Municipal Sector Plan. This will be based on all the evidence that has been collated, including the recent Eonomia analysis of six local authorities. The evidence consistently points to kerbside sort
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		<h2>Results</h2> <p>The constituent and total emission factors for commingled and source segregated recycle streams, within the system boundaries described, are set out in the table below:</p> <table border="1"> <thead> <tr> <th colspan="2">Commingled</th> <th colspan="2">Source Segregated</th> </tr> <tr> <th>Description</th> <th>Data</th> <th>Description</th> <th>Data</th> </tr> </thead> <tbody> <tr> <td>Collection including residual waste</td> <td>10.6 kgCO₂/tonne</td> <td>Collection minus equivalent residual waste</td> <td>23.5 kgCO₂/tonne</td> </tr> <tr> <td>MRF activities</td> <td>10.7 kgCO₂/tonne</td> <td>Bulking station activities</td> <td>5.9 kgCO₂/tonne</td> </tr> <tr> <td>Residual waste disposal</td> <td>0.2 kgCO₂/tonne</td> <td>Equivalent residual waste disposal</td> <td>0.6 kgCO₂/tonne</td> </tr> <tr> <td>Total</td> <td>21.6 kgCO₂/tonne</td> <td>Total</td> <td>30.0 kgCO₂/tonne</td> </tr> </tbody> </table> <p>The difference between the emission factors is 8.4 kgCO₂/tonne. The collection of commingled recycle produces 72% of the carbon emissions associated with source segregated recycle.</p> <p>The higher expected participation rates necessary and expected by all authorities will give rise to a substantial increase in waste-miles-hours, a far larger increase in the case of source segregation. It surely follows that any reduction in vehicle emissions within community collection areas by co mingled collections will be in the interest of public health, more sustainable and as such supported by local authorities.</p>	Commingled		Source Segregated		Description	Data	Description	Data	Collection including residual waste	10.6 kgCO ₂ /tonne	Collection minus equivalent residual waste	23.5 kgCO ₂ /tonne	MRF activities	10.7 kgCO ₂ /tonne	Bulking station activities	5.9 kgCO ₂ /tonne	Residual waste disposal	0.2 kgCO ₂ /tonne	Equivalent residual waste disposal	0.6 kgCO ₂ /tonne	Total	21.6 kgCO ₂ /tonne	Total	30.0 kgCO ₂ /tonne	<p>being better than co-mingled collections in terms of a range of sustainable development outcomes. The Assembly Government policy preference remains the use of kerbside sort approaches to kerbside recycling and it is considering how best to promote this within a collaborative framework with Welsh local government.</p> <p>4. [See response to 8. above]</p>
Commingled		Source Segregated																									
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11. May Gurney Environmental Services	Yes	No comment given.	No action necessary.																								
12. Local Authority Recycling Advisory Committee	Yes	No comment given.	No action necessary.																								
13. Flintshire County Council	Other	1. The overall impression given by the SA is that the strategy will have a positive impact against the identified framework objectives. However, the methodology is arguably constrained by the assessment being limited to the direct actions within the Plan. It does not allow assessment of indirect effects which are just as	See response 1.																								

		<p>important in terms of sustainable development.</p> <ol style="list-style-type: none"> 2. Significantly, there is no consideration of what impact the costs of the Plan could have on services other than waste. If the increased cost of waste services squeezes other service budgets, this could result in a negative impact – e.g. if public health and/or countryside budgets were cut to help meet the costs of waste services, this could impact negatively on the health and/or biodiversity objectives (shown as likely to be positive in most cases). Likewise, traffic congestion that arises as a result of new waste collections could have an impact, especially in urban areas, on air quality. 3. The assessment compares 'do nothing', 'best practice' and 'beyond best practice' options, with the Sector Plan presented as the 'best practice' option. WAG will be aware of the significant debate around commingled and kerbside sort and it is therefore of surprise to note that kerbside sort appears in beyond best practice; in this respect, there seems to be a disconnection. 	
14. Cylch	No	<ol style="list-style-type: none"> 1. We are concerned that the framework objectives used to assess the municipal sector plan appear to be very narrow in their focus. The sustainability appraisal appears to have focussed primarily on environmental objectives rather than a full set of sustainability objectives. There are few that address the social impacts and appear to be none considering the economic aspects. They also seem to vary from those used to assess the overarching strategy. 2. The indicators also need further work - for example the indicator relating to developing indicators relating to social enterprises is not defined and unclear. It is also unclear how visitor and educational facilities at 'waste' facilities contributes to sustainability. 3. It is also unclear how the indicators listed here, those in the MSP and those in Towards Zero waste interrelate. 	<ol style="list-style-type: none"> 1. No action necessary - the assessment framework has largely been built on that developed for the SA of TZW and has been subject o consultation with statutory bodies. The framework comprises a number of socio-economic objectives and sub-objectives. These include, for example, sub-objectives relating to education and awareness, health, employment and accessibility. 2. With regard the indicators set out in the Sustainability Report, these are identified to assist the Welsh Assembly Government in assessing the socio-economic and environmental effects of the plan and it is acknowledged that in some instances further work is required to identify potential indicators. With respect to educational centres at waste facilities, these would provide opportunities for education and help raise awareness of sustainable waste

			<p>management.</p> <p>3. Chapter 6 of the MSP Part 1 sets out the programme for monitoring the MSP Part 1 whilst specific indicators are identified under the key themes of the Plan. Monitoring of the socio-economic and environmental effects of the MSP Part 1 will be undertaken alongside this programme and, where appropriate, relevant MSP Part 1 indicators have been included in the proposed framework.</p>
15. Conwy CBC	Yes	<p>1. The SA should also consider the indirect positive impact of source segregation as a driver for behavioural change and increased overall environmental awareness. As stated on P.80 of the MSP, it helps the householder consider better the consequences of their purchasing and consumption behaviour, which will potentially affect overall carbon use.</p> <p>2. In the scenario testing, the 'Do Maximum' option appears to be the actual MSP, as it is based on kerbside sort, and not an alternative.</p>	<p>1. No action necessary - the assessment of Action 3.4.5.1 (c): Collecting and delivering quality materials to end markets (kerbside sorting), highlights that the introduction of kerbside sorting is expected to increase household awareness of sustainable waste management by engaging more with the public and making the volume and type of waste they produce more visible and, therefore, more effectively changing behaviour.</p> <p>2. No action necessary - Table 4.1 of the Sustainability Report sets out the differences between the alternatives assessed. The assessment of the alternatives contained within Table 4.2 of the Sustainability Report takes into account these differences but notes that, in undertaking the assessment, it has been assumed that the Do Maximum Alternative also includes kerbside sort.</p>
16. Clothes Aid	Yes	No comment given	No action necessary.
17. New Earth	Yes	1. Overall, NESG agrees with the method of preparation and conclusions of the	1. This comment primarily relates to actions

Solutions Group Ltd		<p>Sustainability Appraisal. As discussed below in more detail, NESG are concerned that strategic policy is moving away from being 'technology agnostic' with regards to energy recovery from source separated biowaste. NESG consider that Action 3.5.5.1 (c): Generation of High Quality Compost/AD Digestate is too prescriptive towards a single advanced EfW technology, and risks stifling innovation in the management of such biowaste. NESG recommend that such prescription risks affecting local authorities' abilities to deliver the most effective solution on a case-by-case basis, particularly as alternative advanced EfW technologies, capable of managing all forms of biowaste, as opposed to just food waste, are developed.</p> <p>2. The absence of suitable anaerobic digestion capacity in Wales to manage food waste is already leading to food waste being exported to In-Vessel Composting facilities in England for management, such as to the NESG Facility at Sharpness. NESG welcomes this trade, but believe Welsh authorities should develop their own facilities. The national policy support to 'pick winners' from the current available technology choices, namely AD, risks stifling initiative and innovation, and Wales' long-term sustainable development objectives.</p>	<p>within the draft MSP Part 1 rather than the Sustainability Report and will be considered as part of the preparation of the final MSP Part 1.</p> <p>2. No action necessary - the Welsh Assembly Government considers that AD offers the best environmental outcomes for the management of food waste in Wales based on the evidence it has analysed. Therefore AD is the preferred option that is supported under the local authority Food Waste Treatment Programme.</p>
18. Chepstow Friends of the Earth	No	<p>1. Peak Oil should have been included as an SA Topic. Wales will need to adapt to Peak Oil and the rising price of energy just as it will to climate change.</p> <p>2. Including incinerator bottom ash in recycling targets (pg.xi) will NOT help to reduce climate change but will drive climate change by tending to encourage LAs to undertake less primary recycling. In addition, bottom ash should be regarded as neutral on waste management and waste infrastructure (white box). Even if these comments are rejected, the Waste Management box should be pale green, not dark green, as there is only one tick in the box.</p>	<p>1. No action necessary - the SA topics are informed by Annex I of the SEA Directive. In addition, a number of sub-objectives are considered to cover energy consumption/production either directly (e.g. To promote the use of on site renewable energy and energy from waste as appropriate) or indirectly (e.g. To contribute to the reduction /minimisation of Wales' Ecological Footprint and progress self-sufficiency in waste management).</p> <p>2. No action necessary - as set out in the assessment matrix contained within Appendix C of the Sustainability Report, the inclusion of processed incinerator bottom ash in recycling targets was assessed as having a significant positive effect in relation to climate change as the proposal is expected to increase the amount of energy</p>

			<p>generated from Energy from Waste facilities and reduce greenhouse gas emissions related to the landfill process. More indirectly, the Environment Agency has indicated that diverting bottom ash from landfill utilising quality protocols could save over 398,000 tonnes of virgin raw materials, generating a saving of over 41,000 tonnes of CO2 equivalent emissions annually across the UK. The MSP Part 1 also promotes the waste management hierarchy and in this respect puts a cap on the amount of EfW for example – the recycling target for individual local authorities is 58% for 2015 – 16, this means that automatically no more than 42% of their municipal waste can be counted as being subjected to energy recovery.</p> <p>3. Regarding Table 3.4 (Summary of Action Assessments), this box has been coloured dark green in error. This action was assessed as having an overall positive effect in relation to the Waste Management objective which is reflected in the assessment matrices contained within Appendix C of the Sustainability Report and by the single 'tick' in the table.</p>
19. Ceredigion County Council	Other	<p>1. The overall impression given by the SA is that the strategy will have a positive impact against the identified framework objectives. The methodology, however, is arguably constrained by the assessment being limited to the direct actions within the plan. Indirect effects are just as important in terms of sustainable development, but the plan does not allow for assessment of these.</p> <p>2. Importantly, there is no consideration of what impacts the costs of the plan could have on services other than waste. It is likely that the increased costs of waste services would squeeze the budgets of other services, particularly in the current difficult economic climate.</p>	<p>1. See response 1.</p> <p>2. See response 1.</p> <p>3. No action necessary - this is not the only sustainability issue for consideration in taking forward kerbside sort. The Welsh Assembly Government has amassed a considerable evidence base that supports kerbside sort over co-mingled collections which is included as Appendix 2 of the final</p>

		<p>3. It is clear that the plan assumes that co-mingled collection cannot produce recyclates which are clean and suitable for reprocessing -there is much evidence from both the market and Local Authorities that this is not the case. Indeed WAG are still commissioning studies in this area [to the incomplete evidence to support this stance?].</p> <p>4. We also find it surprising that kerbside sort is listed in the 'Beyond best practice' section given WAG's emphasis on this collection method.]</p>	<p>MSP Part 1.</p> <p>4. No action necessary - Table 4.1 of the Sustainability Report sets out the differences between the alternatives assessed. The assessment of these alternatives contained within Table 4.2 of the Sustainability Report takes into account these differences but notes that, in undertaking the assessment, it has been assumed that the Do Maximum Alternative also includes kerbside sort</p>
20. Ceredigion and Powys County Council	Other	<p>1. The overall impression given by the SA is that the strategy will have a positive impact against the identified framework objectives. The methodology, however, is arguably constrained by the assessment being limited to the direct actions within the plan. Indirect effects are just as important in terms of sustainable development, but the plan does not allow for assessment of these.</p> <p>2. Importantly, there is no consideration of what impacts the costs of the plan could have on services other than waste. It is likely that the increased costs of waste services would squeeze the budgets of other services, particularly in the current difficult economic climate.</p> <p>3. It is clear that the plan assumes that co-mingled collection cannot produce recyclates which are clean and suitable for reprocessing – there is much evidence from both the market and Local Authorities that this is not the case. Indeed WAG are still commissioning studies in this area to the incomplete evidence to support this stance. We also find it surprising that kerbside sort is listed in the 'Beyond best practice' section given WAG's emphasis on this collection method.</p>	<p>1. See response 1.</p>
21. Carmarthenshire County Council	Yes	No comments given.	No action necessary.
22. Bridgend CBC	Yes	Generally but have two points	<p>1. No action necessary - Action 3.2.5.2(h) was not taken forward for assessment as part of the SA process as the draft MSP Part 1 does</p>

		<p>3.2.5.2(h) Single use carrier bags</p> <p>1. It is questionable whether the controversy associated with the charging of plastic carrier bags is worth the effort. The main benefit will come from the awareness raising message that by reducing the number of bags is also reducing waste. While this is a powerful message it may only leave short term effect. A reduction in the number of bags will also probably result in less litter. Reducing bags themselves, however, will not make a significant impact in achieving any of the targets. In addition, plastic bags can often be of benefit for containing other waste including the removal of dog faeces, etc. On balance the reduction is supported but only marginally.</p> <p>3.2.5.1(g) Separating commercial and household waste</p> <p>2. These two waste streams need to be collected separately. It will be beneficial to know accurately the makeup and quantity of each waste stream. Also, thinking ahead, commercial waste can often include materials of a heavier nature which could be detrimental to separation systems in a residual waste plant.</p>	<p>not in itself introduce a levy on single use carrier bags but instead provides a signpost to proposed legislation.</p> <p>2. The Collection, Infrastructure and Markets Sector plan advocates a source separated collection system for the key recyclable materials collected from commercial premises. This will ensure a quality approach and will help to facilitate the management of these waste streams. It would be up to individual local authorities to decide how best to collect recyclates from business – some find it best to collect them independently, some find it best to collect them together. Most residual treatment plants will have provision to remove heavy items at the front end.</p>
23. Caerphilly County Borough Council	Other	<p>1. The conclusions of the sustainability appraisal appear to suggest that the strategy will have a positive impact against the framework objectives outlined. However, as the assessment is constrained to the 'direct' actions within the plan and does not allow assessment of 'indirect' effects of these actions it can be viewed as being somewhat limited. There is no consideration to the impact that the plan could have on non-waste services across the Authority, e.g. if other budgets are cut to accommodate increased costs in Waste Management there could be negative impacts on some of the framework objectives.</p> <p>2. Interestingly, 'kerbside sort' which WAG has indicated on several occasions is their preferred collection method for household recyclables is classified as 'beyond best practice'.</p>	1. See response 1.
24. Blaenau Gwent County Borough Council	Yes	No comments given.	No action necessary.
25. Keep Wales	No	No. Keep Wales Tidy would suggest changes with regard to the following:	1. No action necessary - it is acknowledged within the assessment matrices contained in

Tidy		<ol style="list-style-type: none"> 1. Action 3.2.5.1- Some of the actions could have more “mixed impacts” on “civic engagement” and “landscape, biodiversity and cultural heritage” as they could result in e.g. more fly-tipping . Please see our response to Questions 3 and 6 below. 2. Action 3.2.5.2 - Legislation to introduce a levy on a single use carrier bags – We would argue that this would have “Clear strong positive impacts” on landscape, biodiversity and cultural heritage. Please see our Policy Position Paper on Plastic Bags on our website and evidence provided by Keep Wales Tidy for other Assembly consultations on this subject. 3. With regard to Potential Indicators to monitor the effects of the MSP we would:- <ul style="list-style-type: none"> • Question the validity of 5a the number of new waste infrastructure developments built [on] brown field land or that re-use buildings – as these sites can often be more valuable for biodiversity than green field sites. • Suggest that an indicator that measures changes in Fly-tipping is included under civic engagement. • Ask under 5b, under civic engagement don’t all public bodies – including local authorities have to produce information in Welsh and English? Is providing information a good indicator that people are reading or using it? • Other indicators could be the number of people volunteering to get involved in waste reduction / clearance projects and the number of Eco -Schools with green flags. 	<p>Appendix C of the Sustainability Report that some actions (e.g. Action 3.2.5.1a) could result in increased fly tipping which may have a negative effect on the landscape, biodiversity and cultural heritage objective. In addition, the potential increase in fly tipping was identified during the assessment process and additional text was added to the draft MSP Part 1 under Action 3.2.5.1(c) relating to the prevention of fly-tipping (see Table 1.1 of the Sustainability Report). Further mitigation measures related to fly-tipping were also identified in the Sustainability Report (see Section 3.4.4 of the Sustainability Report).</p> <ol style="list-style-type: none"> 2. No action necessary - Action 3.2.5.2(h) was not taken forward for assessment as part of the SA process as the draft MSP Part 1 does to in itself introduce a levy on single use carrierbags but instead provides a signpost to proposed legislation. 3. Regarding 5a, there is a clear policy direction to support the preference for development of brownfield sites and it is therefore not considered appropriate to amend this indicator. Regarding 5b, this indicator is to be removed. The proposed indicator relating to volunteering has been included within the monitoring programme. The revised framework is set out in Appendix D of this Post Adoption Statement.
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26.	Cardiff Council	No	<p>1. No, the appraisal does not fully consider future service requirements. A collection method that delivers 40% is very different than a service that delivers 70%. For example vehicle numbers and returns to the depot are not fully considered for +60% recycling service.</p> <p>1. No action necessary - there are collection systems in place that are able to achieve high recycling rates with a single pass of collection vehicles. The life cycle assessment modelling for 70% recycling included a second vehicle pass. The results still showed a major benefit in terms of reduced greenhouse gas emissions overall.</p>

Appendix D Proposed Monitoring Programme

Table D.1 Proposed Monitoring Programme

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
Waste Management	SoE Indicator 9a: Quantity of municipal waste per person per annum	1. To raise awareness and understanding of sustainable waste reduction and management and encourage resource efficiency and sustainable consumption	1a, 3a. Percentage of household waste sent for reuse, recycling and composting (SoE Indicator 9a)	1a, 3a, 4a and 4b – SoE Indicator 9a
	SoE Indicator 2a and 7b: Ecological Footprint		1b, 3b Percentage of municipal waste landfilled (SoE Indicator 11a)	1b, 3b - SoE Indicator 11a
	SoE Indicator 9a: Quantity of municipal waste per person per annum	2. To increase infrastructural capacity and facilities for sustainable waste management	1c. Public access to knowledge and understanding of resource efficiency and waste management	1c, 1d. Waste Awareness Wales
	SD Indicator 6. Resource efficiency		1d. Number, type, extent and effectiveness of waste prevention, reuse and preparing for reuse campaigns and recycling in each local authority	1e, 3c. WRAP
		3. To encourage behavioural change and participation amongst household, commercial and industrial operators	1e, 3c. Recyclability of household waste	2a, 2c, 2d WAG, local authority waste and planning departments
		4. To contribute to the reduction/minimisation of Wales' Ecological Footprint and progress self-sufficiency in waste management	2a. Number of bring sites	3b. Waste Awareness Wales
			2b Number of reuse and recycling centres	3d. WAG
			2c Percentage of households served by recycling and composting collections	
			2d Percentage of trade waste customers offered a recycling and/or composting collection service	
			3b. Willingness to participate in waste prevention, reuse and recycling	

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
			<p>3d. Number of households receiving a kerbside waste collection service in Wales for key materials</p> <p>4a. Kg of household waste collected per head (SoE Indicator 9a)</p> <p>4b Kg of residual household waste per head (SoE Indicator 9a)</p>	
Waste infrastructure	<p>SD Indicator 5 Employment</p> <p>SD Indicator 29. Population of working age on key benefits - the percentage of people of working age on key benefits</p> <p>SD Indicator 14 Workless Households</p> <p>SD Indicator 1. Economic output - Gross Value Added (GVA) and GVA per head</p>	<p>1. To promote markets for recyclates and recycled goods</p> <p>2. To encourage the development and deployment of alternative waste technologies and R&D</p> <p>3. To encourage sustainable design of waste infrastructure and promote the development of the green technologies sector and sustainable procurement</p> <p>4. To promote equality of opportunity and access to local employment, training and upskilling and volunteering</p> <p>5. To support existing and develop new social enterprises focusing on waste as a community resource</p> <p>6. To provide cost-effective</p>	<p>1, 2. Indicators needs to be developed</p> <p>3a. Number of new waste management facilities designed and built to meet minimum BREEAM standards;</p> <p>3b Percentage of recycled content material used in any new waste facilities which are built.</p> <p>4a. Number of new starters/turnover and proportions of ethnic minorities and registered disabled compared to total number of waste employees.</p> <p>4b. Indicator to be developed relating to training opportunities. It is noted that the EU Sector Skills Council has been commissioned to report on training which may identify potential indicators.</p> <p>4c. Indicator to be developed relating to access to jobs and employability in recycling and preparing for reuse. It is noted that WAG is to commission research on indicators to monitor and measure accessibility to jobs and employability.</p> <p>5. Indicators need to be developed.</p> <p>6a. Cost of service provision for each</p>	<p>3a, b. Local authority waste and planning departments</p> <p>4a. Source to be determined but may be available from local authority waste departments and contractors. If data not available from contractors consideration should be given to requesting that such data be made available as new waste contracts are agreed</p> <p>6a. WAG/WLGA</p> <p>6b. WAG</p>

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
		and reliable sustainable waste management	local authority of collecting waste and the costs of disposing of waste per person/per household/per tonne. 6b. Household satisfaction with collection services	
Landscape, biodiversity and cultural heritage	<p>SoE Indicator 19a: Trends in Biodiversity Action Plan species and habitats</p> <p>SoE Indicator 21: Percentage of features on Natura 2000 sites in favourable or recovering condition</p> <p>SoE Indicator 19b: Trends in wild birds population index</p> <p>SoE Indicator 26: The number of historic assets deemed to be at risk</p> <p>*No landscape indicator identified.</p>	<ol style="list-style-type: none"> 1. To protect designated landscapes: environmental, cultural and historic 2. To protect and enhance biodiversity, geodiversity, flora and fauna including biodiversity and ecological connectivity 3. To protect and enhance designated and undesignated historic assets and their settings, including listed buildings, scheduled ancient monuments, and historic parks and gardens 4. To protect the character and visual identity of landscapes and townscapes, including cultural and historic landscapes 5. To promote the use of brownfield land use 6. To ensure the provision of recycling facilities in all new developments and improve capacity in existing built infrastructure 7. To remediate 	<p>1a, 2a, 3a, 4a. Number of new waste infrastructure sites built within international, national and local designated areas</p> <p>1b, 2b, 3b, 4b Number of new waste infrastructure sites built where the planning application was objected to by a statutory consultee for landscape reasons</p> <p>5a. Number of new waste infrastructure developments built on brownfield land or that reuse existing buildings</p> <p>5b Number of redundant waste infrastructure sites or buildings that are reused for other developments</p> <p>6. Number of Local Planning Authorities who include a policy in their Local/Unitary Development Plan (or within Supplementary Planning Policy) that require recycling/waste provision to be included in planning proposals for all appropriate development (e.g. residential, retail, employment, leisure) of sufficient facility for recycling in all new developments</p> <p>7. Number of new waste infrastructure developments that include remediation of land in the planning application</p>	All. Local authority waste and planning departments

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
		contaminated land		
Soil	*No soil indicator identified.	<ol style="list-style-type: none"> To protect against contamination of soil To conserve and treat source segregated organic waste for improving the quality of Welsh soils 	<ol style="list-style-type: none"> Number of new waste infrastructure sites built on sites of good agricultural quality or better according to the Agricultural Land Classification system Amount of organic waste produced in Wales and proportion used within Wales. 	<ol style="list-style-type: none"> Local authority waste and planning departments WAG
Water	<p>SoE Indicator 35a: River water quality - biological and chemical</p> <p>SoE Indicator 13b: The percentage of resource zones meeting target headroom requirements</p> <p>*No flood risk indicator identified.</p>	<ol style="list-style-type: none"> To promote sustainable flood risk management To protect and enhance groundwater and river quality in the inland, coastal and maritime environments 	<ol style="list-style-type: none"> Number of new waste infrastructure sites built on flood prone land against EAW advice Number of new waste developments with Sustainable Urban Drainage Systems (SUDS) Number of notifiable water quality incidents from waste infrastructure sites Water usage by waste facilities 	<ol style="list-style-type: none"> Local authority waste and planning departments, EAW Local authority waste, environmental health departments, EAW Local authority waste departments and contractors
Air quality, noise and odour	<p>SoE Indicator 33a: Trends in number of days when air pollution is moderate or higher in rural zones and urban agglomerations</p> <p>SD Indicator 17. Ecological impacts of air pollution</p>	<ol style="list-style-type: none"> To promote proximity of facilities to local settlements and sustainable transport modes/practices to serve such facilities with preference given to walking and cycling To minimise adverse impacts to air quality arising directly from facilities or transportation of materials to and from facilities To minimise adverse impacts to noise levels 	<ol style="list-style-type: none"> Number of new waste infrastructure sites built in urban areas Number of new and existing waste infrastructure sites built in Air Quality Management Areas Number of noise complaints regarding waste infrastructure sites Number of odour complaints against waste infrastructure sites 	<ol style="list-style-type: none"> Local authority waste and planning departments Local authority waste, planning and environmental health departments

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
		within communities 4. To minimise odours arising from waste processing and its impact upon local communities		
Climate change To assist with Wales' capacity to adapt to and mitigate against climatic change	SoE Indicator 7a: Annual emissions of basket of greenhouse gases (by sector) SD Indicator 8. Electricity from renewable sources	1. To reduce greenhouse gas emissions 2. To contribute to national, regional and local level carbon abatement strategy/objectives 3. To promote the use of on site renewable energy and energy from waste where appropriate 4. To be adaptable to predicted climate change effects including fluvial and marine flooding and extreme weather effects	1a, 2a. Electricity usage in waste infrastructure facilities 1b, 2b Amount of fuel consumed by waste collection and disposal facilities 1c, 2c. Tonnage and proportion of waste transported by road, rail and water 1d, 2d. Tonnage of waste transported to disposal sites 1e, 2e. Distance travelled by waste to disposal sites 3a. Number of new and existing waste infrastructure sites that include on site renewable energy or low carbon energy generation (either on site or exported to the grid) 3b. Total amount of renewable/low carbon energy generated from waste infrastructure sites 3c. Level of thermal efficiency achieved through residual waste treatment. 4a. Number of new waste infrastructure sites built on flood prone land against EAW advice 4b Number of new waste infrastructure developments with Sustainable Urban Drainage Systems (SUDS)	1a, 1b, 2a, 2b, 3a, 3b Local authority waste departments 3c. WAG 1c, 1d, 1e, 2c, 2d, 2 source to be determined 4a, b. Local authority waste and planning departments, EAW
Health	SD Indicator 12	1. To provide safe, secure,	1a Proportion of local authority waste	1. Local authority

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
To protect and enhance the health and well-being of communities	<p>Child poverty</p> <p>SD Indicator 11 Crime</p> <p>SD Indicator 28a Health inequality</p> <p>SD Indicator 28b Health inequality</p> <p>SD Indicator 9 Housing</p> <p>SD Indicator 24a Mobility</p> <p>SD Indicator 13 Pensioner poverty</p>	<p>mechanisms for civic engagement</p> <p>2. To prevent the exposure of members of the public to hazards, noise and odour arising from waste</p> <p>3. To provide opportunities for those with health issues to gain suitable and meaningful employment</p> <p>4. To provide safe and healthy working environments for employees within the waste and recycling industries</p>	<p>plans with a consultation plan</p> <p>1b Number of waste related civic engagement events</p> <p>1c Number of people who provide formal or informal comments on waste related civic engagement events</p> <p>2a, 4. Number of health and safety incidents reported from waste infrastructure and collection</p> <p>2b Number of complaints received by waste departments/contractors operating municipal waste facilities</p> <p>2c Number of fly tipping incidents</p> <p>3. Number of new starters, turnover and proportions of registered disabled in the waste workforce</p>	<p>waste and planning departments</p> <p>2a, 4. Local authority waste and environmental health departments</p> <p>2b Local authority waste and environmental health departments</p> <p>2c StatsWales</p> <p>3. Source to be determined but may be available from local authority waste departments and contractors. If data not available from contractors consideration should be given to requesting that such data be made available as new waste contracts are agreed</p>
<p>Civic engagement</p> <p>To increase civic engagement in sustainable waste practice</p>	<p>SD Indicator 10 Accessibility</p> <p>SD Indicator 15 Active Community Participation</p> <p>SD Indicator 27a. Education</p> <p>SD Indicator 27b. Education</p>	<p>1. To raise awareness and understanding of sustainable waste strategy, objectives and management</p> <p>2. To increase participation in more sustainable waste practice for all members of society, including socially disadvantaged groups and the poor</p>	<p>1a. Number, type, extent and effectiveness of waste prevention, reuse and preparing for reuse campaigns and recycling in each local authority</p> <p>1b. Public access to knowledge and understanding of resource efficiency and waste management</p> <p>2a. Willingness to participate in waste prevention, reuse and recycling</p> <p>2b. Number of households receiving a</p>	<p>1a. WAG, Local authority waste and planning departments, Waste Awareness Wales</p> <p>1b, 2a. Waste Awareness Wales</p> <p>2b, 3b, 5. WAG</p> <p>3a. Local authority</p>

Objective	Baseline/Trend Indicators ¹	Sub Objectives	Potential Indicators to Monitor the Effects of the MSP	Potential Source of Information
		<p>3. To increase accessibility to sustainable waste facilities and infrastructure and tackle physical and social barriers to engagement</p> <p>4. To support and provide opportunities for volunteering in the waste and recycling industries</p> <p>5. To ensure all promotional literature is published in Welsh as well as English where appropriate</p> <p>6. To provide community facilities, including visitor and educational centres</p>	<p>kerbside waste collection service in Wales for key materials</p> <p>3a. Number of waste infrastructure facilities with disabled access</p> <p>3b Number of Equalities Impact Assessments carried out for waste policy documents</p> <p>3c Accessibility to waste management facilities</p> <p>4a. Number of people volunteering to get involved in waste reduction / clearance projects</p> <p>4b. Number of Eco -Schools with green flags</p> <p>5 Number of National strategies that are written in Welsh first and translated to English (i.e. written from an initial Welsh language perspective)</p> <p>6a. Number of waste facilities with visitor and educational centres</p> <p>6b Number of visitors to waste facility visitor and educational centres</p>	<p>waste and planning departments, WAG</p> <p>3c. Source to be determined</p> <p>4a. WAG, Waste Awareness Wales</p> <p>6. Local authority waste departments contractors, WAG, Waste Awareness Wales</p>

Notes:

1. Reference in the table to waste infrastructure sites should be taken to mean household/municipal waste sites only.

2. Where reference is made to monitoring the number of waste infrastructure sites in the table it may also be appropriate to monitor the area of the developments to allow more proportionate comparisons over time, e.g. the area of waste infrastructure developments built against EAW advice on flood prone land may be a more appropriate monitoring measure than the number of such sites.