

Clean Neighbourhoods Responses  
DEFRA  
Zone 4/E9 Ashburn House  
123 Victoria Street  
LONDON SW1E 6DE

7<sup>th</sup> September 2004

Dear Sir/Madam

**RE: CLEAN NEIGHBOURHOODS CONSULTATION DOCUMENT – JULY 2004  
RESPONSE BY THE NATIONAL ASSOCIATION OF WASTE DISPOSAL OFFICERS**

The National Association of Waste Disposal Officers (NAWDO) welcomes the opportunity to comment in respect of the above Consultation Document.

Whilst NAWDO will restrict its specific comments to questions relating to powers and responsibilities of Waste Disposal Authorities (WDA's) NAWDO would like also to initially make the following general comments and observations.

The proposals contained within the consultation document are most encouraging for local authorities. Not only as they accept and reiterate many of the problems local communities and authorities face the document proposes to give authorities the power that authorities have been asking for to assist in tackling illegal and anti-social behaviour with our communities. NAWDO and all officers working within local government welcome this.

The proposals within the bill appear to show a clear commitment from government to provide the tools and hopefully the resources for local authorities to effectively deal with littering, fly-tipping and environmental crime.

The proposed repeal of the divestment of the provision for waste disposal functions is welcomed by NAWDO. This proposal will give authorities greater scope in providing service delivery options especially in meeting their future landfill allowances and recycling targets which at present authorities are considering entering into public procurements processes which in most cases tie them into long term risk management contracts with private sector providers.

Continuation sheet

NAWDO welcomes these proposals and considers the divestment requirements of the Environmental Protection Act 1990 will give the flexibility to authorities (WDA's) and ensure that a far greater partnership approach can be achieved giving equal risk and performance sharing that will truly reflect the Best Value principle.

With regard to the proposal to introduce "Site Waste Management Plans" to ensure the more sustainable management of waste from construction and demolition (C and D) waste NAWDO feels is questionable.

In principal the Plan should provide the basis for control and increase the recycling of C and D wastes. However in practice the vast majority of fly-tipped C and D wastes emanate from smaller building operations or DIY activities. It is therefore unlikely that these significant sources of illegally deposited waste would fall within the scope of these Plans.

"Paragraphs relating to the payment of recycling audits being mandatory to third parties".

In conclusion NAWDO feels that if this consultation document has a failing then it is the fact that no real timescale for the introduction of the proposals is proposed.

If these measures are needed then NAWDO feels that a timescale for their introduction should have been proposed which would reflect a sense of greater government commitment.

Yours faithfully