

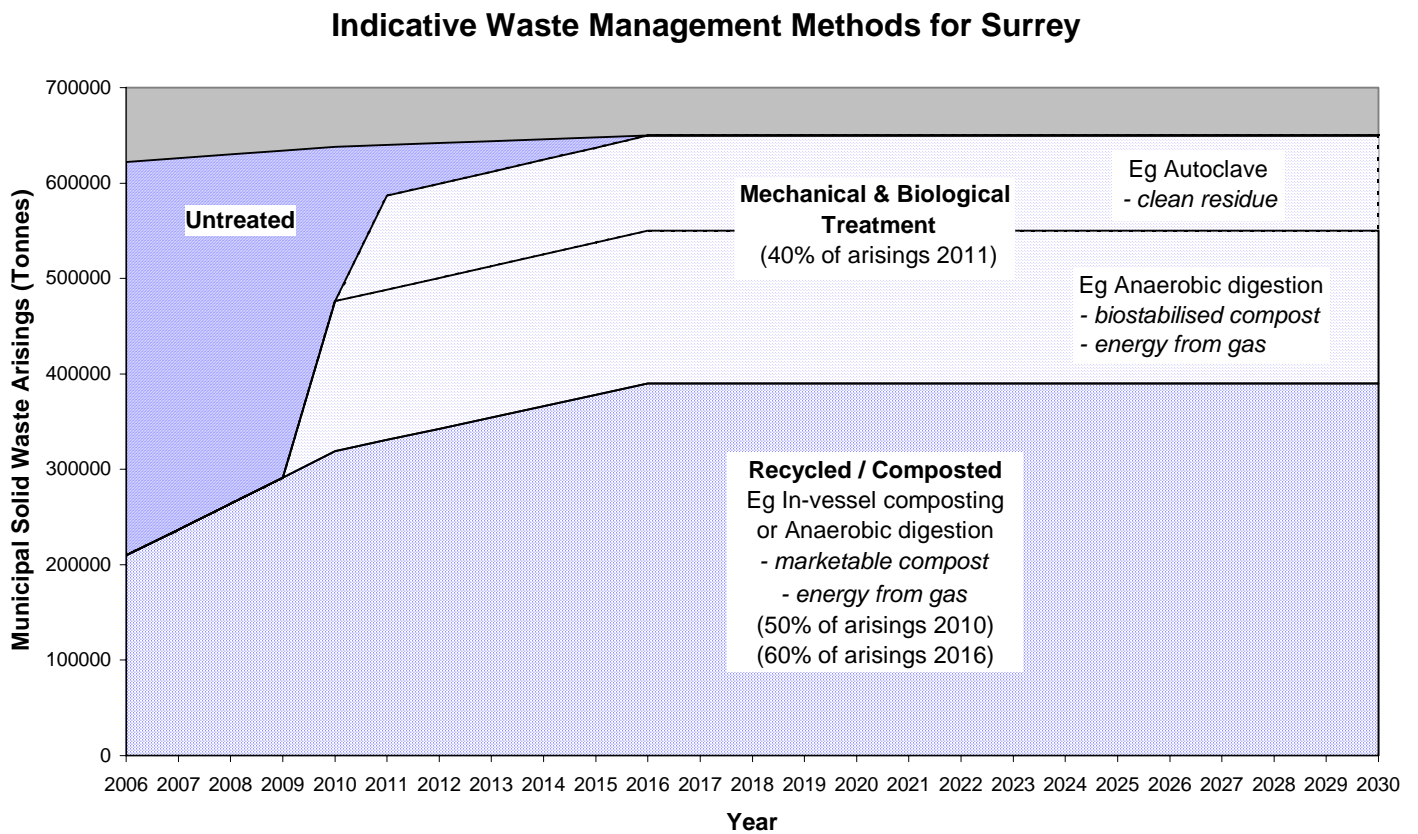
SCC - WASTE DISPOSAL AUTHORITY ACTION PLAN

Waste Strategy Submission by GAIN

for consideration by the
ENVIRONMENT & ECONOMY SELECT COMMITTEE

GAIN welcomes the opportunity to contribute to the Committee's deliberations.

Figure 1:



Waste Figures: Quantity and Quality

How Much Waste?

As noted by Defra, there are encouraging signs that the rate at which municipal waste arisings are increasing is slowing down. As awareness about waste increases and waste minimization measures start to have greater impacts upon producers and consumers, further reductions in the rate at which waste is generated should be possible. GAIN submits that a reasonable ambition would be to work towards a leveling of municipal waste generated in Surrey from 2016 onwards (see Figure 1). This gives ten years for waste minimization policies to impact on behaviour. Using Entec's figures, this would mean working towards Surrey's municipal solid waste reaching a plateau at about 650,000 tonnes by 2016. If the number of households in

the county continues to increase, this stand-still target would represent a marginal reduction in waste generated per household. This compares with Entec's proposal to plan for 705,000 tonnes of waste by 2030.

Is GAIN's proposal reasonable? A comparison with the recycling targets may be useful. At the time Surrey's contract with Sita was drawn up, a 12.5% recycling figure was considered ambitious. Now far higher figures are being achieved and planned for. Waste minimization policies and legislation will mean nothing and will have failed if in ten years time we are unable to achieve modest per household reductions in the amount of waste generated. Case Studies in the Strategy Unit's "Waste Not Want Not" Report (2002) show that where variable charging schemes have been implemented in over nine European countries, residual waste collected has typically fallen by 10-25 per cent and often by around 30 per cent with weight-based systems. In five years time, it will be possible to assess the impact of waste minimization in Surrey and factor in new capacity if required.

Recycling, Composting and Residual Treatment Targets

Entec proposes that residual treatment capacity should be 40% of municipal waste from 2015-2030. This leaves scope for a 60% recycling and composting target. However, this 40% represents a growing capacity from 262,000 tonnes in 2015 to 282,000 tonnes in 2030. GAIN questions Entec's proposal to size residual treatment capacity at 44% of waste arising between 2010 and 2015. At 44%, this annual capacity of 278,000 tonnes would be 13,000 tonnes greater than the maximum GAIN would support. Also, it is not clear that all treatment capacity will be fully operational by 2009/10, an assumption Entec itself is sceptical about. GAIN assumes one plant will be operating by 2010 and a second by 2011. GAIN advocates sizing residual treatment capacity at 260,000 tonnes. This is 40% of the 2016 total municipal waste target suggested by GAIN and also the level at which GAIN suggests Surrey should plan to cap its municipal waste growth. This could be achieved through two 130,000 tonne capacity residual treatment complexes, each potentially comprising a mix of a 80,000 tonne and 50,000 tonne unit.

GAIN does not support a 52% recycling and composting target for Surrey as envisaged by Entec. This assumes 35-45% recycling and composting by Waste Collection Authorities and 60% at Civic Amenity Sites. GAIN strongly advocates a 60% recycling and composting target for Waste Collection Authorities. GAIN proposes an overall, county recycling and composting target of 50% by 2010 and 60% by 2016 (see figure 1). This represents 75% of the municipal waste that is potentially recyclable or compostable in Surrey and assumes 25% is not separated by householders or reprocessed.

High recycling and composting consistently feature well as a means of meeting targets in sustainability appraisals at regional and county levels. The Sustainability Appraisal recommends that the Plan "makes an explicit commitment to achieve a high recycling rate". GAIN supports this.

What Kind of Waste?

All decisions on waste handling capacity should be based on accurate data on the composition of Surrey's waste, including on the make up of waste remaining after maximum recycling and composting. This will enable the mix of treatment technologies to be matched to the materials to be treated. It is particularly important to know what proportion of waste remaining after maximum recycling and composting will be biodegradable. This fraction will lend itself to biological treatment and also need "bio-stabilising" to avoid problems with Landfill Allowances.

Considering waste streams separately is strongly encouraged by the Regional Guidance, which identifies the need to establish “resource recovery systems based on material streams, serving all sectors.” “This requires a focus on key material streams (for example food waste, paper, plastics, metals, chemicals, aggregates) rather than waste origins (for example household, commercial), segregation of these as far as possible, and assessment of the most appropriate management methods to maximize recovery.”

Another important reason for analyzing waste composition will be to identify materials or mixed material products that it will be particularly desirable to design out of the waste stream over the next ten years. They may not lend themselves to bio-stabilization or recycling because they are too mixed, clog up a process or react unfavourably to treatment.

Separating Out Hazardous Waste

In order to minimize pollution during waste treatment and to produce waste treatment residues for which uses can be found, it will be important to ensure waste streams are as clean as possible. This will require any potentially hazardous materials such as household cleaners, paints, treated wood, garden chemicals and batteries to be removed and taken to a site for safe disposal or, ideally, recycling.

A major public education campaign will be required to change behaviour backed up by appropriate facilities for handling hazardous household waste materials. Facilities for treating and where possible recycling such materials are likely to be more suited to a regional scale of operation as envisaged in the draft Regional Waste Strategy. However, it will be essential for Surrey to ensure its contribution to such infrastructure is in place as soon as possible to clean up waste streams.

Meeting LATS Requirements

Entec advises that Landfill Allowance Trading Scheme targets can potentially be met using Mechanical and Biological Treatment (MBT) without Incineration. GAIN calls on the Waste Disposal Authority to work up an incinerator-free option as part of the Joint Municipal Waste Management Strategy process.

GAIN has plotted various scenarios against Surrey’s biodegradable Landfill Allowance targets. Surrey’s target for reducing biodegradable waste sent to landfill is to send no more than 106,795 tonnes by 2019 (falling from 152,623 tonnes by 2012). Under Incinerator-Free MBT Option 2, Entec has assumed an 80% reduction in the biodegradability of residue. Figures 2, 3 and 4 test Surrey’s biodegradable Landfill Allowances against more pessimistic assumptions. Figure 2 assumes that MBT residue is 33% biodegradable (rather than 20%). Figure 3 assumes MBT residue is 40% biodegradable. Figure 4 assumes that MBT residue is 33% biodegradable and that all untreated landfill is treated as biodegradable.

These profiles are based on Entec’s option 2 of MBT without incineration but with the same assumptions on waste volumes as in Figure 1: Indicative Waste Management Methods for Surrey. These assumptions include residual treatment facilities not coming on stream until 2010 and 2011 (as opposed to Entec’s very optimistic assumptions of plant operating by 2009), a higher recycling target and waste growth levelling off in ten years. Essentially Surrey would be using its LATS allowance for recycling and composting shortfall, for recycling residues, for waste too big or inappropriate for MBT and any remaining biodegradability in MBT waste outputs.

Figure 2:

Surrey Landfill Allowance: Biodegradable = 33% of MBT Output + 75% of Untreated

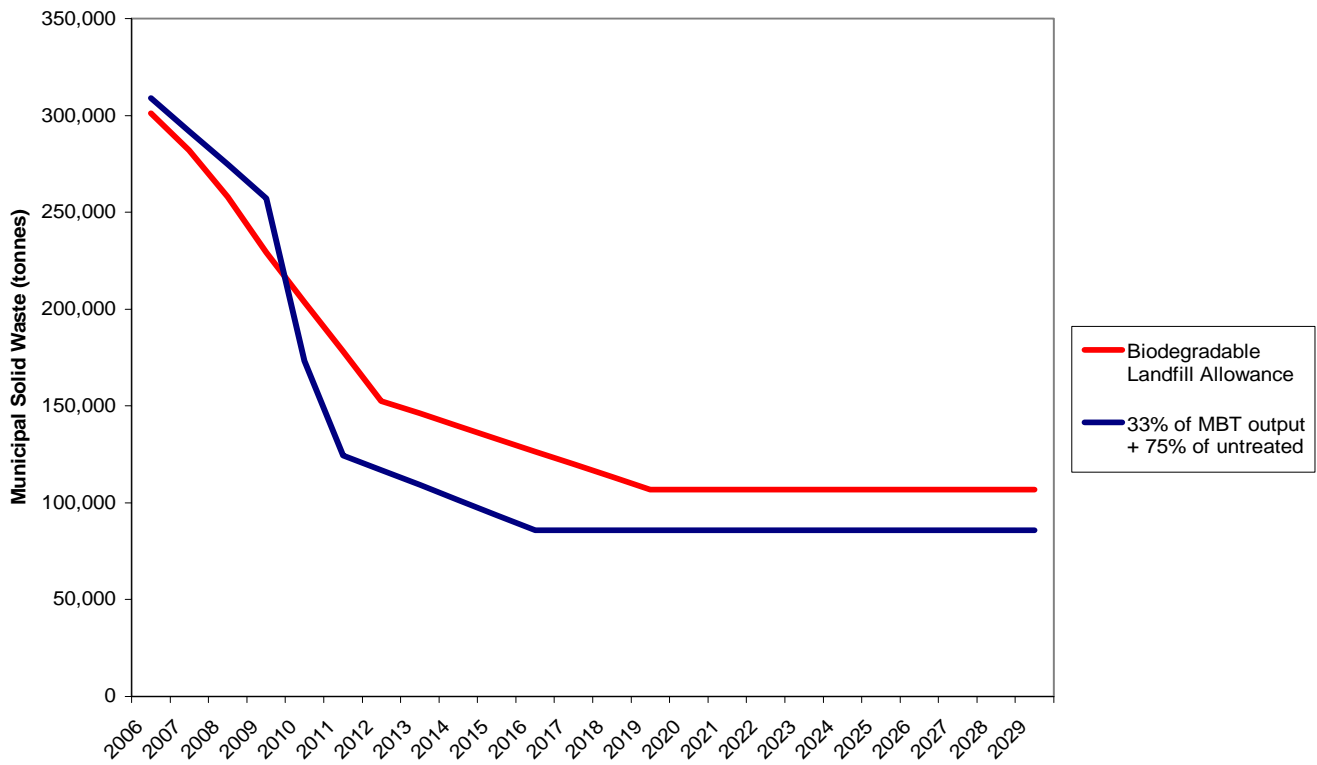


Figure 3:

Surrey Landfill Allowance: Biodegradable = 33% of MBT Output + 100% of Untreated

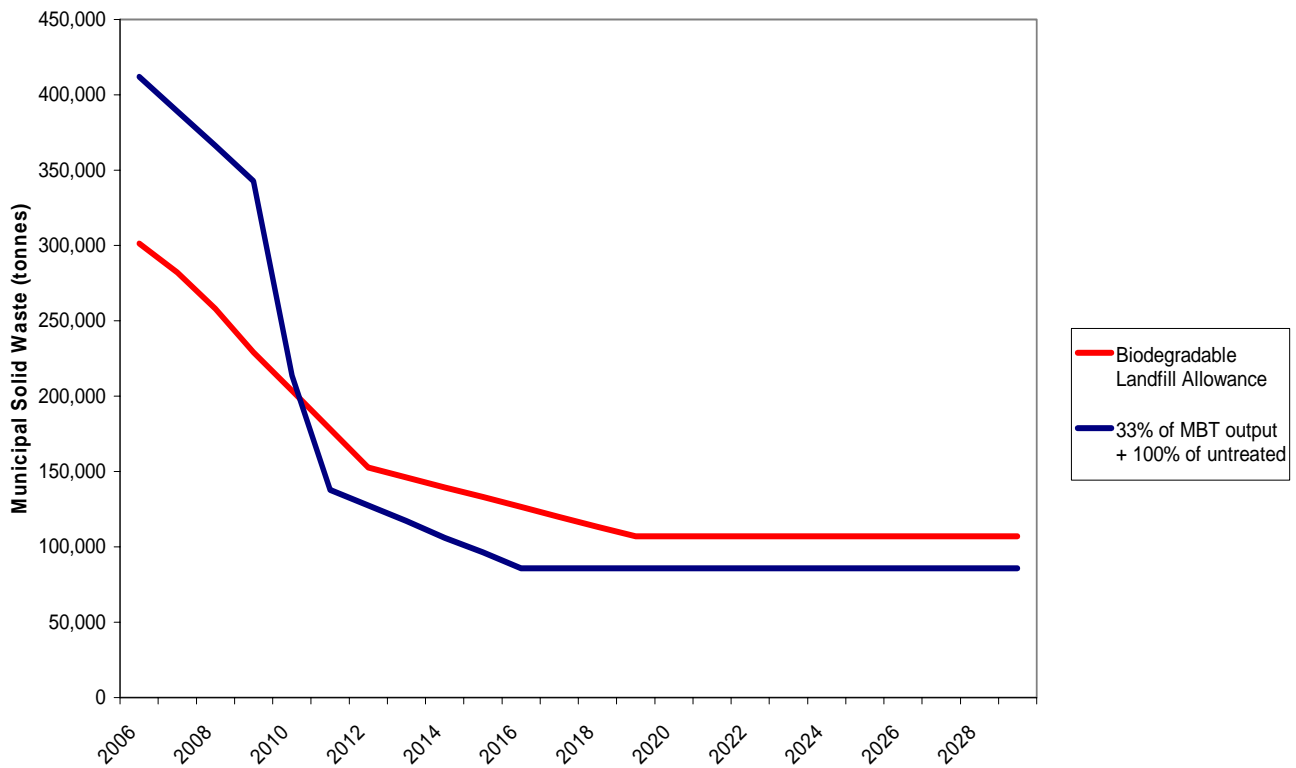
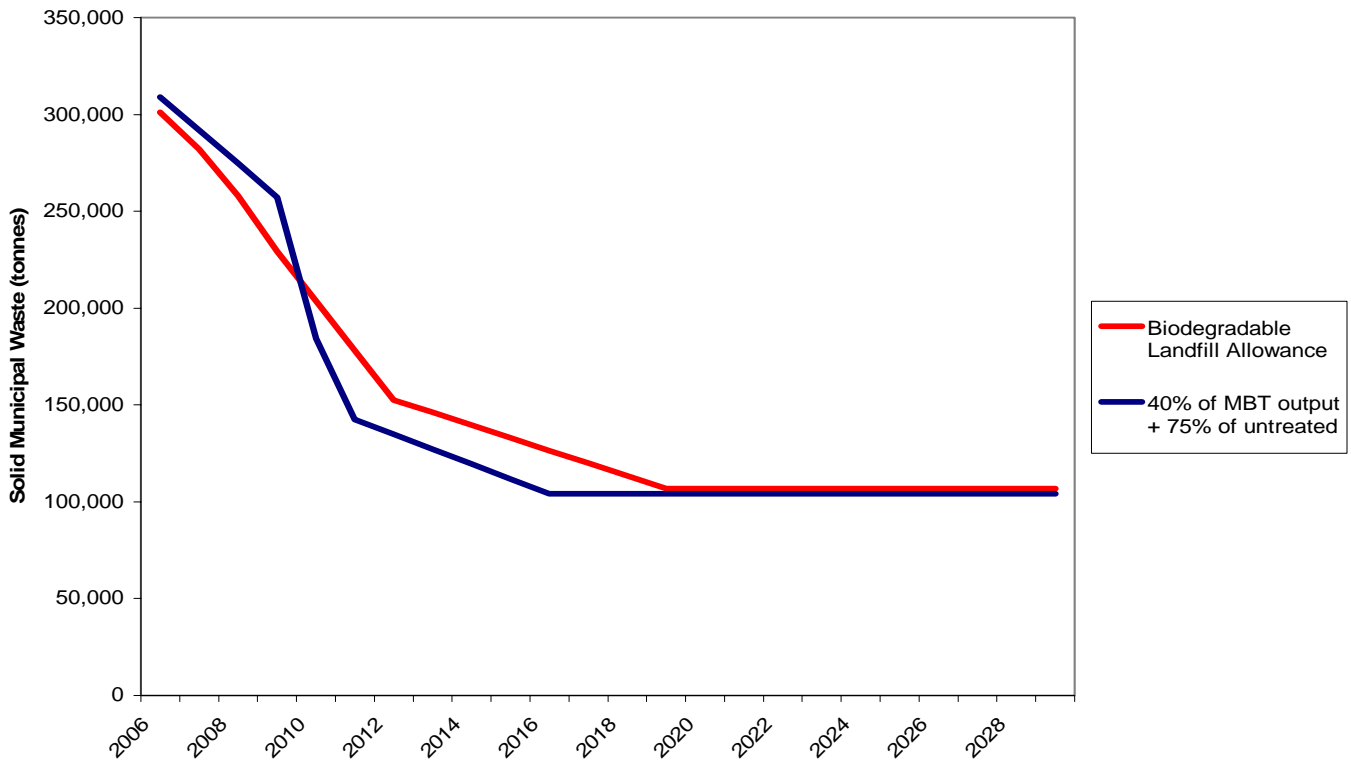


Figure 4:

Surrey Landfill Allowance: Biodegradable = 40% of MBT Output + 75% of Untreated



It should be noted that, as Entec advises, under all scenarios, including incineration, targets for diversion from landfill will be very difficult to achieve initially due to delay in the provision of waste treatment facilities.

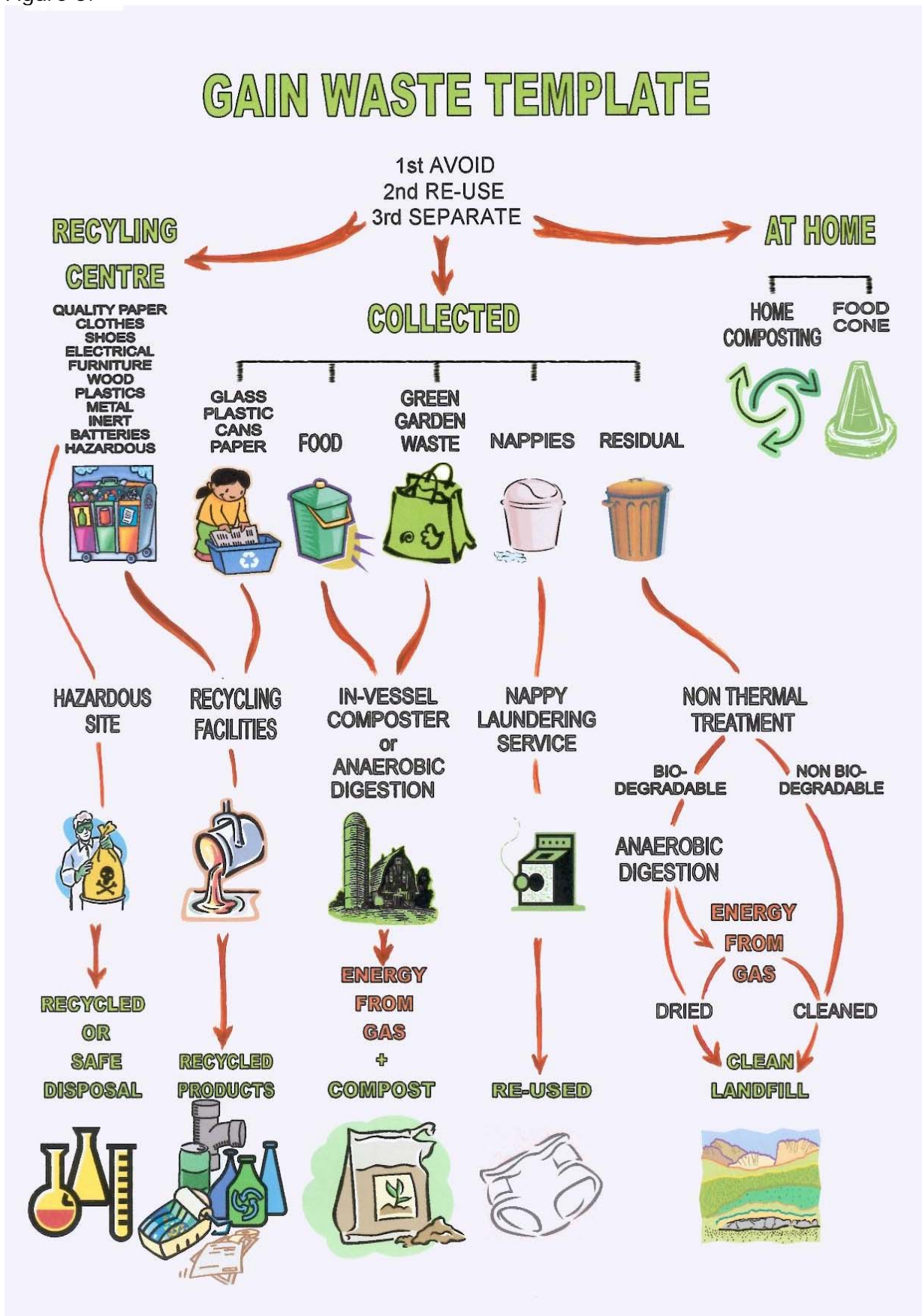
Recovery

Entec does not offer an incinerator-free option that meets the draft 2025 Regional Waste Target of 84% recovery. GAIN would like to see a package of incinerator-free measures aimed at meeting this recovery target worked up to establish the extent to which it could be met. GAIN notes that Defra is consulting on whether to abandon recovery targets in its current review of the Waste Strategy and that the regional "recovery" target will be reviewed regularly. The key requirements are to meet European targets on the avoidance of biodegradable waste in landfill, national targets for recycling and composting and to avoid waste treatment with unacceptable environmental impacts.

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GAIN WASTE TEMPLATE:

Figure 5:



Collection Facilities:

Civic Amenity Sites



The Regional Planning Guidance urges speedy introduction of better facilities to separate waste at Civic Amenity Sites. GAIN suggests such upgraded sites should be called "Recycling Centres". Surrey needs to give much more impetus to improving Civic Amenity Sites, ensuring that each community in the county has a "Recycling Centre" in which it can take pride in performance and where there are opportunities for reuse. Surrey's were assessed by Defra because their performance was well below average in England. Significantly, the range of materials separated was seen as inadequate. The report noted that, 'the current contract arrangements with Surrey Waste Management do not provide specific targets for recycling, composting or customer satisfaction at the Civic Amenity sites'. Contract revisions should provide ambitious targets and formal monitoring of performance with an audit trail. The modest Civic Amenity Site upgrades being delivered under the contract now were originally only intended to achieve 12.5% recycling.

Investment in Civic Amenity Sites will be cost effective because of waste treatment and disposal costs avoided and their contribution to recycling targets. Defra's report highlighted the potential for speedy improvements in diversion of biodegradable waste from landfill at upgraded Civic Amenity Sites and also demonstrated very significant *savings* that could be made as a result. A radical overhaul of these sites will also have an important early part to play in contributing to changing public attitudes to waste.

Separated Recycling Collections



GAIN welcomes the intention to provide waste collections that separate out materials at source, including food, to avoid cross contamination of waste materials and the cost of sorting recyclables from mixed waste.

Separately Collected Biodegradable Waste Streams

GAIN attaches great significance to separating out the various biodegradable waste streams into food, garden and less clean. To make this point, in the waste template (Figure 5), the stream for food waste is not merged with the stream for the biodegradable element of residual waste. Source separated garden waste can be used to produce premium, clean compost. Food waste can also be used for compost if it reaches sufficiently high temperatures during treatment but processing in a separate stream at the same facility is suggested to provide flexibility when food scares arise. The aim should be to reduce to the minimum possible the amount of biodegradable waste that has been mixed in with general household waste before

being treated. This lower grade stream is likely to need bio-stabilization, drying and more carefully prescribed use or disposal.

Waste Treatment Facilities Required:

Home Composting



This review should not underestimate the potential contribution of home composting for green waste and of 'Green Cones' for food waste across Surrey. The return on promoting these low cost and simple treatment facilities is great because the costs of collection, of capacity at a large treatment facility and of disposal are avoided. A scheme is needed to assist with the installation, as well as provision, of green cones and to ensure that they are incorporated into all appropriate new developments and extended properties.

Nappies

Nappy laundering services should be stepped up and promoted with a budget that adequately reflects both the benefits of taking nappies out of landfill and of changing attitudes and behaviour concerning waste generation.

Energy from Gas

The opportunities for recovering energy from waste without burning it need to come across more clearly. Composting and other biological treatments produce biogas, which can be used for energy. As the Regional Planning Guidance describes, anaerobic digestion of biodegradable waste converts up to 60% of the organic matter into methane and carbon dioxide, which, following treatment, can be burned to produce energy and/ or heat. Given that 60% of Surrey's waste is biodegradable, this is a particularly interesting option in Surrey and can contribute to both material and energy recovery. The potential for harnessing energy from various waste processes is less likely to be overlooked if "...with energy generation" is added to any relevant process be it Incineration, Anaerobic Digestion, In-Vessel Composting or Mechanical and Biological Treatment.

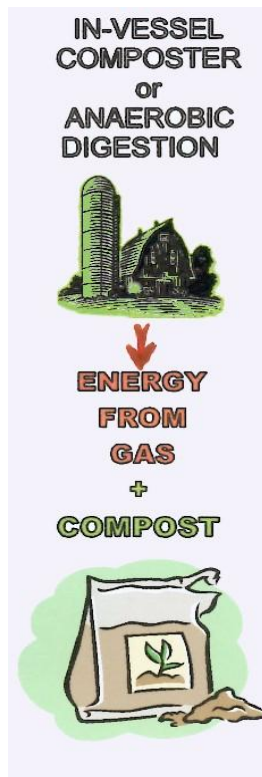
Number of Plants

The Disposal Plan needs to take much greater account of the fact that a larger number of smaller sites emerged as a better option in the Waste Plan Sustainability Appraisal. This chimes with public opinion as measured by the Surrey Integrated Waste Strategy consultation. Several smaller facilities could be better suited to a densely populated but small county.

The Waste Plan states that the planning, environmental and traffic impacts of a greater number of smaller sites would be cumulatively greater than a smaller number of larger sites. The Sustainability Appraisal concludes that, "This statement is not borne out by the outcome of the appraisal." A network of In-Vessel Compost Plants with gas capture across the county emerges as a very sensible early priority from the Sustainability Appraisal. Entec proposes a minimum size of 70,000 tonnes for residual waste treatment plants.

High recycling and composting consistently feature well as a means of meeting targets in Sustainability Appraisals at regional and county levels. The Waste Plan Sustainability Appraisal recommends that the Plan “makes an explicit commitment to achieve a high recycling rate and to deliver more dispersed facilities”. We support this.

Composting



GAIN advocates use of In-Vessel Composting with Gas Capture for collected garden waste and potentially for some food waste. It does not advocate Windrow Composting. This is in order to control the liquid and gaseous emissions and also importantly in order to harness the energy. If energy is used transporting material for composting, GAIN submits it is important to ensure energy is generated from the gas given off during decomposition. Also, if composting is undertaken In-Vessel, GAIN anticipates that it will be more feasible to find locations on industrial sites and to accommodate such facilities closer to centres of population reducing transport costs and impacts. Another advantage of In-Vessel Composting is that it works well on a small scale.

The Best Practicable Environmental Option (BPEO) Analysis undertaken by ERM for the Waste Plan (page 3-29) worked on the basis that “a minimum of 11 composting facilities ... will be required to manage municipal waste for all options”. GAIN strongly supports the principle that each District should have either its own or a shared In-Vessel Compost facility from which local residents are encouraged to use the output. The Draft Waste Disposal Plan proposes two/three which seems too few to achieve a sense of community ownership and also to keep down transport costs and impacts of this heavy waste fraction.

GAIN is receptive to the possibility that in part of the county there may be circumstance where it may be more appropriate for some food and garden waste to be processed at an Anaerobic Digestion Plant with Gas Capture (continuous configuration). Under this scenario it is vital that material is kept in a separate stream from any mixed, residual waste in order to ensure confidence in the quality of the compost output.

Mix of Plants for Residual Waste

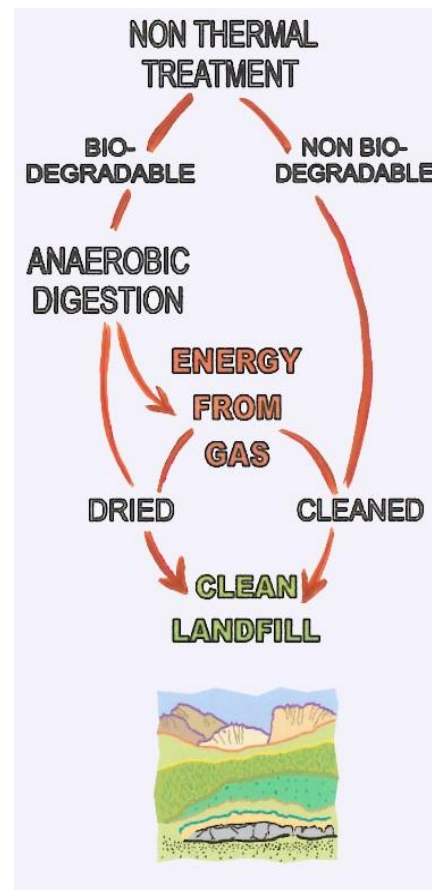
In the absence of a detailed breakdown of the composition of Surrey's waste once 60% recycling and composting have been achieved, GAIN works from the following principles in determining an appropriate mix of treatment facilities:

- biodegradable residual will be well-suited to biological treatment in a controlled environment where discharges can be contained and gas can be captured for energy,
- some of the non-biodegradable residual will lend itself to being cleaned and
- some residual products will be best-targeted for being phased out or substituted with materials that are more readily reused, recycled or composted.

GAIN is particularly interested in the potential benefits of locating some facilities alongside each other in a Mechanical and Biological Treatment Complex. For example, the potential of harnessing gas from treating the biological fraction of

residual waste could be valuable in generating energy for cleaning the non-biodegradable fraction in an adjoining plant. When assessed as part of a joint operation, the energy required by some technologies to breakdown and bio-stabilize waste becomes less of an issue. The principal mixed assessments undertaken by Entec have been to treat Mechanical and Biological Treatment (MBT), Anaerobic Digestion or Autoclaving as a pre-treatment for incineration (Options 4-6). Various combinations of Anaerobic Digestion and Autoclaving within an MBT complex have not been set out as options.

Option 2 in Entec's analysis is for Mechanical and Biological Treatment (MBT) set up so that 36.7% of the output is compost and 38.4% goes to landfill. It is assumed the landfilled residue has lost 80% of its biodegradability. There is no clear analysis of the properties of these two outputs or assessment as to whether either output could benefit from further treatment. The moisture loss in MBT Option 2 is less than for MBT Options 3 and 4 where the prime output would be to create fuel for burning. An assessment of the potential benefits of achieving greater moisture loss in Option 2 would be valuable.



It is important to appreciate that the impacts of MBT, Anaerobic Digestion and Autoclaving will depend on the combination of processes and how they are configured. As part of the Joint Municipal Waste Management Strategy process, GAIN would like to see more work done on MBT configurations for residual waste that do not produce outputs for incineration. It would like to see a clear audit trail of all the assumptions. GAIN would be particularly interested in the following configuration with assessment based on a clear analysis of the waste **inputs** anticipated once Surrey has achieved 60% recycling and composting:

- 1) composition of material into MBT complex
- 2) initial sorting, recovery of recyclable materials, treatment of material unsuitable for Anaerobic Digestion or Autoclaving
- 3) material directed to Anaerobic Digestion configured to minimize pollution, produce either usable compost or dry, bio-stabilized residue and harness energy from gas, recovery of recyclable materials
- 4) Autoclave (or other cleaning process) using energy from biological treatment, configured to minimize pollution, produce dry, bio-stabilized, sterile residue of reduced volume, recovery of recyclable materials

Clean Landfill

As Sita has made clear, under all scenarios landfill will have a continuing role to play. GAIN fully supports the drive to halt unsorted landfill and wishes more to be done to clean up the legacy of old dirty landfill. GAIN welcomes the fact that the Landfill Directive is driving the need to remove biodegradable waste from landfill. However, in considering technology options, it is important not to overlook the potential for clean landfill taking separated, bio-stabilized material where appropriate void spaces have been created by extraction. This could be an environmentally acceptable

disposal option for a small and diminishing amount of non-recyclable, non-biodegradable waste or for some of the solid output from biological treatment of mixed, bio-stabilized waste.

It is also unavoidable that hazardous landfill capacity will be required and difficulty in securing this is a regional issue.

Role of the Contract

We are troubled by the extent to which Surrey's waste planning appears to be being driven by the Disposal Authority's waste contract with Sita. We consider the contract to have been poorly managed and inflexibly drafted, and to be outdated. We are fearful that some may find it more expedient to try to make Waste Disposal Plans fit the contract, as far as statutory targets allow, rather than to adapt the contract to deliver the community's waste needs. Defra has made it very clear that it would expect a contract that is incompatible with the Local Development Framework to be reviewed and changed.

The contract is described as one of the "drivers of the plan" in the "Selection of Preferred Options" section of the Waste Plan and it is elevated to a status comparable with planning policy.

GAIN considers that the structure of the contract, and the way it has been managed, has impeded the establishment of In-Vessel Composting facilities in Surrey. Even the one compost facility to be provided in the original contract has not been delivered. Delay in developing this capacity for composting biodegradable waste means that Surrey has lost valuable time in preparing to meet targets for removal of biodegradable waste from landfill and the county faces financial penalties. The Council has received many thousands of letters calling for In-Vessel Compost Facilities.

Appraisals and Assessments

Residents perceive that problems with incineration are played down and problems with other technologies played up in the way assessments are used and reported. Euphemisms are used for incineration in consultations. This undermines confidence.

Eg. In the Best Practicable Environmental Option Assessment by ERM that accompanied the Waste Plan, the weightings had to be fixed to give incineration a higher score (doubled from 22% to 44% to change the outcome of the BPEO assessment to favour incineration). Even then there were flaws in the figures so the true score for incineration was weak. The score for incineration was largely elevated by the fact that the industry is familiar with this technology.

Eg. In the Sustainability Appraisal for the Regional Waste Strategy, maximum composting and recycling was seen as one of the best options at that stage, but such a scenario was dismissed.

Eg. We have been told anything but incineration would be too expensive, in part because recycling collection costs were attributed to other options but not to recycling. Now that recycling collection costs are borne by all residual treatment processes, incineration does not come out as cheapest.

Eg. We are told there are dioxins and heavy metals in the residue of biological waste treatments but there is no mention of these materials in either the bottom ash or fly

ash from incineration. There is no analysis of how much ash is actually used. A recent Parliamentary Question by Anne Milton MP established the most recent available figures show 60% of bottom ash going to landfill. Yet Surrey's reports dwell repeatedly on uncertainties in using outputs from biological treatments. The idea of avoiding sending Pollution Control Residues from incinerators to hazardous landfill by acidifying the lime is being advocated without any regard to dioxin and heavy metal levels in this acidified fly ash.

Eg. It seems curious to issue a statement setting out that Surrey's preferred option for residual waste is incineration and then do an appraisal of options. As ERM have observed, "the statements on the preferred technology and on recycling levels appear to pre-empt the outcome of the Sustainability Appraisal and it is recommended therefore that these are re-examined in the light of the Sustainability Appraisal findings." When you look at the planning framework, various appraisals done by consultants for the Waste Plan and at the outcome of previous consultations, it is very far from certain that Surrey's preferred incinerator option is the best way forward. Anaerobic Digestion and Mechanical and Biological Treatment both offer certain advantages for Surrey's waste. The Sustainability Appraisal states, "It is noted that the Statements of Principles and Intent indicates that incineration is regarded by Surrey County Council as the most sustainable approach presently available. It is recommended that the outcome of this appraisal is used to help inform that position."

Eg. Entec's Residual Waste Treatment Assessment claims there is no difference between technologies in their impact on biodiversity. It does not pick up on the consideration, flagged up by the Waste Plan Sustainability Appraisal, that incineration options impact on biodiversity due to high levels of emissions of nitrous oxides. This is a pollutant where levels are already high in Surrey.

Eg. Districts were told the incinerator free option being developed as part of the Integrated Waste Strategy (Option h) would not comply with Landfill Allowances under LATS and would have to be abandoned. Yet Entec shows that LATS requirements could potentially be met by an incinerator-free option (Option 2).

Eg. Surrey's consultation on the Waste Plan asked whether the public would support waste being treated "in other ways" than landfill without being honest about their intention that this other way would be incineration.

GAIN notes with particular interest how the incinerator-free, MBT Option 2 fared in Entec's "Residual Waste Treatment Assessment" for the Surrey Local Government Association.

- It is a low cost option compared with other options.
- Technology is proven and used elsewhere.
- There are greater risks about outputs being sufficiently bio-stabilized to meet landfill standards compared with some other options because of uncertainty over standards to be required.

Commenting on all options considered Entec only rejects the "landfill all residual" option and concludes: "Overall this analysis highlights that those approaches that meet all the key Landfill Directive targets [including MBT without incineration] are generally comparable. Although some perform better than others, there are no clear preferences in terms of the delivery of the landfill diversion targets, costs and overall environmental performances between the technology alternatives examined."
(words in square brackets added)

Surrey has before it an incinerator-free option for residual waste that has the potential to meet key requirements and that could enjoy widespread public support. GAIN hopes that Surrey will ask Entec to develop variations in the configuration of option 2 (MBT without incineration) so that the most attractive configuration of this incinerator-free option for Surrey can be determined and considered as part of the Joint Municipal Waste Strategy consultation.

Location of Waste Treatment Facilities:

Linking Waste Stream, Technology and Location

GAIN considers that the appropriateness of a location for waste use will depend greatly on the nature of the waste material and waste process being considered. It is noted that the landtake requirement for MBT is greater than that for Anaerobic Digestion alone and that In-Vessel Compost Plants with gas captured can be more readily accommodated within developed areas. GAIN considers that this should be reflected in the selection of locations. MBT would need sites of a scale unlikely to be found or acceptable in built up areas. Anaerobic Digestion (continuous configuration) could potentially be accommodated in appropriate industrial areas. Closed vessel compost plants should be distributed across the county, accessible to all major centres of population.

Surrey has a high population density combined with a large proportion of land – both in the countryside and in settlements – that is designated for its landscape value. There is, therefore, great interest in establishing waste treatment processes that make acceptable neighbours and minimize adverse landscape impacts.

GAIN does not accept that any sites should be earmarked for incineration, or any other combustion process, because of the impacts of this technology, which creates pollutants as a result of the burning process itself and because there are better options. Given the risks and track record of this technology, we are particularly concerned that such technology should not be located close to any centres of population.

Surrey Factors

Surrey has high levels of NO₂ and NO_x with high traffic levels, major congested roads including the M25, M3 and A3 and the effects of two major international airports. It also contains the Thames Basin Heathlands, designated under the European Habitats Directive, which are vulnerable to such pollution. There would be advantages in avoiding thermal waste treatment processes that make a significant contribution to nitrous oxide emissions.

Draft Site Proposals

GAIN would not support incineration at either Capel or Longcross as proposed in the Waste Disposal Authority Action Plan. GAIN is particularly concerned that an incinerator at Longcross could attract Commercial and Industrial waste from a wide catchment and imports from London.

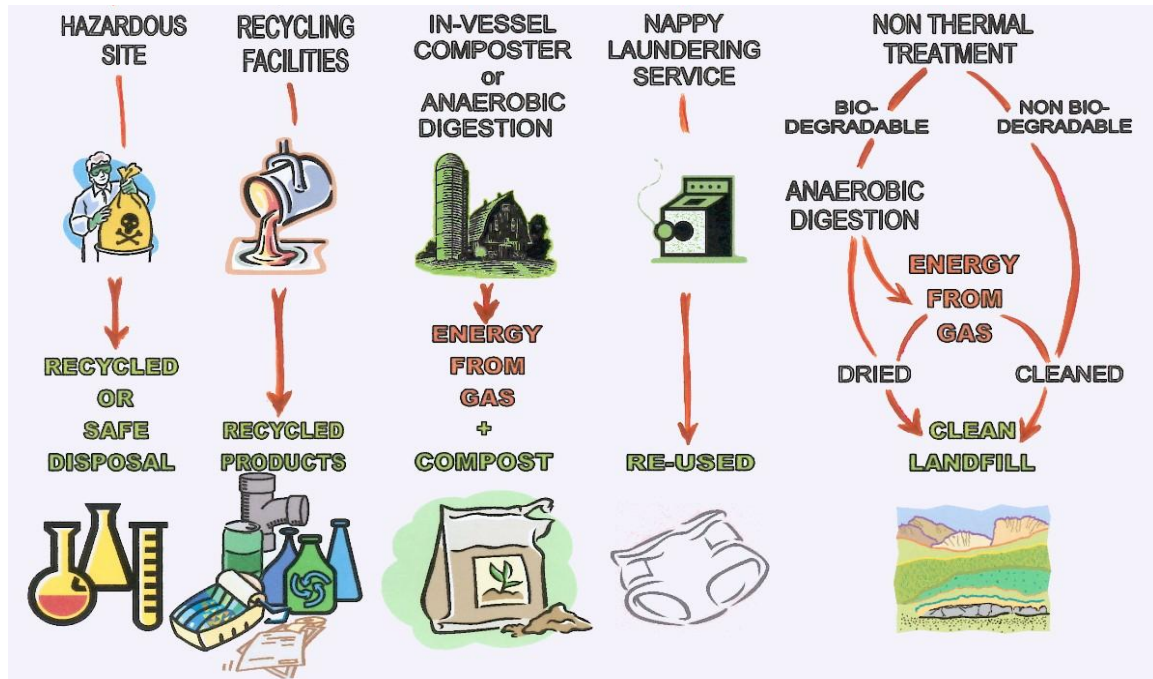
GAIN suggests that there could be less resistance to small scale incinerator-free MBT proposals with Anaerobic Digestion and Autoclaving.

A reason GAIN promotes a significant number of In-Vessel Compost Facilities is that this would encourage all communities in Surrey to take more responsibility for their waste. Better waste separation practices by residents are more likely to be achieved

if residents witness their food waste going to a local plant in their community and producing compost used in their neighbourhood. Otherwise waste will be seen as something sent away to the edges of the county.

Clear size limits should be placed on facilities at any site, given traffic, pollution, landscape and other sustainability impacts. For example, Slyfield may be appropriate for a local In-Vessel Composter but not for a sub-regional facility. For example, the landscape and traffic impacts would be too great.

Delivery and Partnership:



Time is pressing. Penalties for failing to achieving Landfill Allowance targets loom. The moral imperative is there to stop sending unsorted, unstable waste to landfill. GAIN would like to work in partnership with Surrey and the Districts and Boroughs to progress the Joint Municipal Waste Strategy. Numerous consents will be required very quickly. Cooperative working with the community offers advantages.

GAIN proposes the following sequence delivered through a renegotiated contract:

- Establish separated waste collections, including food waste
- Upgrade all Civic Amenity Sites as "Recycling Centres" with re-use services and hazardous waste collection points, accessible to every District and Borough
- Build In-Vessel Composters with gas capture, accessible to every District and Borough, and possibly a continuous Anaerobic Digestion facility with gas capture for food waste. (In-Vessel Composters to come on stream between 2008 and 2010.)
- Build two incinerator-free, residual waste facilities of 130.000 tonnes capacity each, potentially configured around a mix of Anaerobic Digestion and Autoclaving at each site. (To come on stream between 2010 and 2011)

GAIN questions whether residents will be motivated to work with Surrey as partners in achieving waste targets if plans to build two incinerators are pursued.

GAIN April 2006