

Waste Strategy Branch
Waste and Resource Efficiency Division
Welsh Government
3rd Floor, South Wing
Cathays Park, Cardiff
CF10 3NQ

Our ref:
Your ref: WG151124

Date: 24th November 2015

Dear Sir,

Response to the Public Sector Waste and Resource Efficiency Plan

We welcome the opportunity to provide our views on this consultation and recognise the important influence that the public sector has in delivering Welsh Government aspirations within Towards Zero Waste.

The purpose of Natural Resources Wales is to seek to achieve sustainable management of natural resources in relation to Wales, and apply the principles of sustainable management of natural resources. Natural Resources Wales works as a regulator, partner and advisor to businesses, non-governmental organisations, local authorities and communities to help deliver Welsh Government and European Union policies and priorities. We take an ecosystem approach to promoting integrated natural resource management that delivers social, economic and environmental benefits for the people of Wales.

We operate an Environmental Management System that meets ISO14001 requirements and encourage best environmental practices throughout our organisation. We review our activities and operations to identify environmental impacts, prioritising actions to reduce and minimise them. We want to set an example in Wales in how we manage our organisation's own environmental impact by:

- reducing the amount of carbon dioxide and other greenhouse gases that all our activities put into the atmosphere
- reducing energy use in our offices and buildings
- reducing the amount of water we use
- increase resource efficiency in our processes
- reducing the waste we send to landfill
- reducing the amount of miles we drive
- integrating environmental, social and economic factors into our procurement activity.

Ffôn/Tel 029 20466152
Ebost/Email michelle.griffiths@naturalresourceswales.gov.uk
www.cyfoethnaturiolcymru.gov.uk www.naturalresourceswales.gov.uk

Ty Cambria, 29 Newport Road, Cardiff. CF24 0TP

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

I trust you will find these comments and recommendations useful. If you have further queries relating to our comments, please contact Michelle Griffiths michelle.griffiths@naturalresourceswales.gov.uk.

Yours sincerely



Isobel Moore

Pennaeth Rheoliad, Busnes ac Economeg /Head of Business, Regulation and Economics
E-bost/E-mail: Isobel.Moore@cyfoethnaturiolcymru.gov.uk ,
Isobel.Moore@naturalresourceswales.gov.uk

Response to Consultation Questions

1. Do you think that the public sector, through its procurements activities via its supply chain, should encourage the development of more sustainable products and services that use resources more efficiently, including the requirements to have a higher recycled content or procured products?

Yes we believe the public sector has an important role to play in contributing to sustainable development in Wales via their procurement activities. This could be delivered via the Welsh Procurement Policy Statement.

We would also recommend that public sector organisations should be encouraged, when undertaking construction project, to think about all elements of the project to ensure that waste is not introduced into the design. Specifications to the designer should specify this requirement and specialist design software, such as BIM (Business Information Modelling) should be used. The CLAIRE Code of Practice should be specified as a matter of course to allow for excavated materials reuse. Contractors should also be encouraged to use the BRE SMART Waste Tool. We recommend that these requirements should be specified within the procurement /tender documentation.

However, the requirement to specify recycled content in products or construction projects can have unintended consequences and needs careful consideration. For example, some products that are manufactured from recycled content, may be difficult to recycle at the end of their life and therefore can only be disposed of to landfill. A whole life cycle assessment should be encouraged when specifying the use of recycled content to ensure that waste is not designed into the product or construction project.

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It would be useful for the Public Sector to be provided with best practice guidance to enable them to make informed decisions and would be happy to share our experience.

2. Do you think that all public sector organisations should be mandated to implement environmental management systems?

Yes, we would support Welsh Government in mandating public sector organisations to implement an environment management system. The benefits of this are:

- Achieve real cost savings
- Direct efficiencies in energy, water, waste, purchasing and transport
- Management of environmental risk and ensuring legal compliance
- Reduce carbon emissions
- Effectively demonstrate commitment and responsibility to the public
- Demonstrate compliance with supply chain requirements

3. Do you think that the edoc system, should be used by all public sector organisations to manage duty of care reporting requirements? If yes, do you think that this should be mandated?

As a non-executive Board member of the eDOC project, we actively encourage the use of eDOC. We will be trialing the use of EDOC in the South East region early next year and will ensure that we capture and share our experience back to the project.

eDOC is an online system and therefore reduces paper use, saves time, effort and money in fulfilling legal duty of care requirements for waste. In principle we support the mandatory use of eDOC by all public sector organisations and would support the extension to all waste producers in Wales.

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