

**THE INSTITUTION OF ENVIRONMENTAL SCIENCES**

**Our File Ref: 7.5.10**

Landfill Team  
DETR

29/11/99

Dear Sirs,

**Limiting Landfill**

In the time available to the Institution since receipt of the consultation paper (mid October) it has not proved possible to arrange for an expert panel to produce a considered and researched response to this quite detailed set of questions. Nor, as a professional body, do we have immediate access to first hand records and experience that is necessary for the specific opinions you are seeking. We do, however, have a number of more general observations that we would wish to make in our capacity as an interested body.

The tendency towards increasing levels of municipal waste is unlikely to be reversed in the short term and only in the long term with extensive new policies. Landfill as a major disposal option is undesirable and probably unsustainable. It will, however, take considerable time to develop suitable alternative policies and methods in parallel with reductions in landfill quantities. We therefore consider that the option offering the greatest degree of flexibility and most effective means of implementation should be chosen in the development of a statutory instrument.

Having considered the issues set out in the consultation document we consider that the third option, permits for landfill operators to accept biodegradable municipal waste, is the best. Whilst not an ideal solution, our main reasons for this are:

- responsibility for disposal largely rests with the landfill operators now and there would be no significant change of policy
- compliance with the terms of the permit could be enforced in a similar manner to current licence enforcement measures (this could be much more difficult with a local authority permit system)
- the system offers a facility for flexibility in operation and a 'tapering off' of tonnage allowances
- improved design of landfill sites to improve efficiency of operation is possible

We trust that the above points will be of interest and assist the team in drawing their conclusions.

Yours sincerely,

Dr. R. A. Fuller  
Hon. Secretary  
The Institution of Environmental Sciences