

Date: 4<sup>th</sup> September 2013

## **MPA response to the consultation on the Waste Management Plan for England**

Thank you for informing the Minerals Products Association of the consultation on the Waste Management Plan for England.

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

MPA agrees that waste should be prevented at the source and that this will also ensure that resources are used sustainably. Our members are low volume waste producers with an expert track record in both recycling materials, and reusing excavated material beneficially during and post extraction. Our members also play a major part in the movement of Construction, Demolition and Excavation waste (CD&E waste) recycling significant quantities for use in recycled aggregates and utilising residual materials in quarry restoration schemes.

We are disappointed to see that the data reported in figures 2 and 3 remains outdated and does not take into account any of the information provided to Defra in our response to the Call for Evidence for the Waste Prevention Plan for England earlier this year. Moreover, it is our belief that the data is inaccurate since the figure for mineral waste is excessive, and no explanation is given as to how the figure has been arrived at. It should be amended using a better data source, and the MPA would welcome the opportunity to engage with you on this matter.

A number of discussions between Defra and industry have taken place on the statistics provided to Defra for submission to the EU on the quantity of extractive waste produced by the sector. Since the introduction of the Mining Waste Directive and subsequent reporting of extractive waste arisings to the Environment Agency; Defra and the EA have a complete set of data on the actual amount of extractive waste produced in England.

Through discussions we understood that this data was difficult for the EA to collate and so a methodology for determination of waste generated by mining and quarrying companies was discussed. It is disappointing that these discussions have not progressed as a basis for providing a sound input to the draft Waste Management Plan for England.

There is also no definition for the term “mineral waste” in figure 3 that looks at the composition of C&D waste. 34% is classified as “mineral waste” which we can only assume accounts for inert C&D waste. We would consider that C&D waste is not produced by an inefficient process but as a result of the construction of buildings and infrastructure.

The recycling of C&D waste is a significant part of our members operations - indeed, *“29% of the GB aggregates market is supplied by recycled and secondary materials - over twice as high as the European average”* (Source: MPA sustainability report). The remainder, much of which cannot be recycled due to its inherent physical characteristics is often used in quarry restoration and other waste recovery operations.

To conclude, it is essential that the data reported in this Plan is correct since to do otherwise would undermine the credibility of the document. We have made a number of representations on this aspect to Defra and that these have not been represented or taken into account in any way in the Waste Management Plan for England.

I hope you find our comments constructive, please do let me know if I can be of further assistance.

Yours sincerely,

**Nicola Owen**  
Environment and Waste Policy Executive  
Mineral Products Association