

Municipal Waste Policy
DEFRA
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Horseferry Rd
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Controlled Waste Regulations Consultation

The Tourism Alliance was established in 2001 as the voice of the UK tourism industry. It comprises 50 tourism trade associations and destination management organisations that together represent some 200,000 business of all sizes throughout the UK (see Appendix 1 for membership list). The Tourism Alliance's mandate is to work with government on issues relevant to the growth and development of tourism and its contribution to the economy. It is therefore responding to this consultation in that capacity.

1. Introduction

Tourism is the UK's sixth largest industry. A recent study by Deloitte and Oxford Economics, *The Economic Contribution of the Visitor Economy*, found that the total direct and indirect contribution of tourism to the UK economy in 2009 was £115bn (8.9% of GDP) and that the tourism sector directly employs over 1.3m people.

The study went on to that total tourism spending in the UK economy in 2009 was £90bn, with overnight domestic tourism accounting for £22bn of this amount. This was an increase of £1bn (4%) over the previous year. Within the sector, the performance of the self-catering, camping and caravanning sectors has stood out with growth of around 20%. There are a number of reasons for this strong performance including the high levels of investment, improvements in the quality of properties and facilities and shifting patterns in consumer expenditure on holidays.

Due to the strong performance of the tourism industry, the labour-intensive nature of businesses and their ability to quickly provide much need employment, especially in rural and seaside areas, the Government has recently identified Tourism as one of five key industries for providing the growth that the UK requires.

As tourism has been identified by Government as one of the key industries for providing growth, it is important that all policies developed by Departments act to support the sector rather than impose additional costs or regulatory burden.

2. Overview

The Tourism Alliance supports the "Polluter Pays Principle" that underpins the consultation document. It is only appropriate that people and businesses pay

the true cost of their externalities as this is a key step toward a more sustainable future.

The Alliance also believes that, while the polluter should pay, every effort should be made to reduce costs associated with collecting and disposing of rubbish and that every effort should be made to increase the amount of rubbish that is recycled.

3. Impact of Proposals on Tourism Businesses

The Tourism Alliance agrees with the proposal to allow councils to charge for the disposal of waste from self-catering properties, and camping and caravanning sites.

However, the Alliance is firmly opposed to the proposal to classify the waste produced by these businesses as commercial waste. This opposition is based on three factors;

- First, this approach, especially as applied to self-catering properties, is inconsistent with waste charges associated with residential rental properties. "Buy to Let" properties are run as businesses and are occupied for longer than 140 days per annum, yet are deemed to be producing domestic waste.
- Second, the waste produced by these premises is no different in content to domestic waste. As such, the classification of this waste as commercial waste is inconsistent with the Polluter Pays Principle. This is because the classification of the waste, and therefore the charging regime associated with it, is based on the classification of the business and has no relationship to the pollution that is being produced.

Therefore, it is our contention that the waste from these properties should be classified as domestic waste rather than commercial waste as this waste does not differ from normal household waste or waste from other rental property businesses either in composition or, in the case of self-catering properties, volume. This is a view supported by S 75 of the Environmental Protection Act 1990 which defines household or domestic waste as waste from "(a) domestic property, that is to say, a building or self-contained part of a building which is used wholly for the purposes of living accommodation".

It should be noted that the average occupancy of a self-catering property is around 20 weeks per annum. Therefore, under the Polluter Pays Principle, a self catering property should receive a discount of over 50% on the cost of domestic waste disposal as the quantity of waste produced is significantly lower than a domestic residence which is occupied throughout the year.

Similarly, under the Polluter Pays Principle, the charges associated with disposing of domestic waste from camping and caravanning properties needs to reflect the fact that these businesses are only full for a brief period over the summer (indeed, many are closed altogether over the winter period).

There is another very strong reason why the waste from these properties accommodation should be classified as domestic waste. This being that providing a second commercial waste collection service to pick up exactly the same type of rubbish as domestic waste collection service is extremely inefficient and unnecessarily increases costs for both councils and businesses.

The extent of these unnecessary costs is exacerbated by the fact that over 70% of self-catering, caravanning and camping businesses are located in rural or seaside areas which tend to have low numbers of commercial businesses to spread the cost. There is also the considerable environmental impact associated with having to provide two collection services in these areas which needs to be considered.

In terms of environmental impact, it should also be remembered that almost all local authorities now offer a free collection of recyclable materials for domestic properties. If waste from self-catering, camping and caravanning sites is classified as domestic waste, this provides for a recycling collection. Such a collection will provide an incentive for owners and guests at these premises to recycle and help councils reach their recycling targets.

4. **Conclusion**

The Tourism Alliance agrees with the Polluter Pays Principle and with the proposal that self-catering properties, camping grounds and caravan sites should pay for the disposal of their waste. However, this waste is the same in composition, and many cases quantity, as domestic waste and should therefore be classified as such. To have this waste classified as commercial would be inconsistent with other rental properties and counter to the Polluter Pays Principle. It would also cause unnecessary inefficiencies and costs in waste collection, increased pollution and reduce recycling.

Thank you for the opportunity to comment on these proposals. If you would like to discuss any of these issues in further detail, please do not hesitate to contact me.



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Appendix 1: Tourism Alliance Members

Association for Tourism in Higher Education
ABTA – The Travel Association
Association of Leading Visitor Attractions
Bed and Breakfast Association
British Association of Leisure Parks, Piers & Attractions
British Beer & Pub Association
British Educational Travel Association
British Hospitality Association
British Holiday & Home Parks Association
British Marine Federation
British Resorts and Destinations Association
Business In Sport and Leisure
Business Visits and Events Partnership
Camping and Caravanning Club
Confederation of British Industry
Confederation of Passenger Transport UK
Country Land and Business Association
Cumbria Tourism
Destination Performance UK
East of England Tourism
English Association of Self Catering Operators
English UK
European Tour Operators Association
Events Industry Alliance
Farm Stay UK
Guild of Registered Tourist Guides
Heart of England Tourist Board
Heritage Railway Association
Historic Houses Association
Historic Royal Palaces
Holiday Centres Association
National Caravan Council
National Trust
New Forest Tourism Association
Outdoor Industries Association
South West Tourism
The Caravan Club
The Hoseasons Group
Tourism for All
Tourism Management Institute
Tourism Network North East
Tourism Society
Tourism South East
UKinbound
Visit London
VisitCornwall
Visitor Attractions Forum
Welcome to Yorkshire

Associate Members

Local Government Association
SouthWest RDA (representing the RDAs in England)
VisitBritain
VisitEngland