

## LANDFILL DISPOSALS TAX

### RESPONSE BY THE BEVAN FOUNDATION

The Bevan Foundation develops ideas to make Wales a better place and improve people's lives. It is independent of government and politically neutral, and is a registered charity. We welcome the opportunity to respond to the consultation on the proposed Landfill Disposals Tax.

#### **Preamble**

The Wales Act brings a unique opportunity to reform and strengthen a tax on landfill disposals.

#### **Question 1: How important is it that the Welsh Government maintains consistency with the UK Government and Scottish Government on Landfill Tax rates and why?**

It is important that the Welsh Government maintains a tax on waste disposed to landfill. However we do not have sufficient expertise to comment on the implications of the Welsh Government adopting a different regime to that in England and Scotland.

#### **Question 2: Are the current standard and lower tax rates (explained in paragraph 2.2) set at an appropriate level for Wales? Please explain your response.**

We do not have sufficient expertise to comment on this question.

#### **Question 3: Is there value in the Welsh Government having the ability to set different lower rates of tax (explained in paragraph 2.10 - 2.11) and why?**

As a matter of principle the Welsh Government should have the ability to set different rates of tax.

#### **Questions 4 - 26:**

We do not have the expertise to respond to these questions.

#### **Question 27: Should Welsh Government allocate a proportion of Landfill Disposals Tax revenue to enhance the wellbeing of communities?**

We support the principle that the communities directly and adversely affected by the nuisance of a landfill site should receive some benefit as 'compensation' for the detriment they suffer. We consider that such a scheme should:

- be based on boundaries that are closely aligned with the area directly and adversely affected by a landfill site (and not the very broad areas currently eligible – it is hard to see a connection between the dis-amenity of a landfill site and some of the projects cited as examples);
- be simple to access with the minimum of administrative requirements and costs;
- be responsive to the needs of the community, whatever those might be, and not based on narrow criteria.

We strongly recommend that the experience of existing distributors of small grants (e.g. Big Lottery, Community Foundation in Wales, WCVA, County Voluntary Councils) be drawn upon to design an appropriate scheme.

In addition, we support the principle of a proportion of Landfill Disposals Tax being allocated to assist in reducing the amount of waste sent to landfill and waste crime. This is a separate objective and should apply across the whole of Wales.

**Question 28: If the Welsh Government allocates a proportion of Landfill Disposals Tax revenue to enhance community wellbeing, which of the following activities should benefit from funding, and why?**

- Supporting compliance and enforcement and minimising the impact of waste crime?

We would support a proportion of revenue being allocated to this purpose but on an all-Wales basis, not only for communities near landfill sites.

- Supporting waste minimisation and the diversion of waste from landfill?

We would support a proportion of revenue being allocated to this purpose but on an all-Wales basis, not only for communities near landfill sites.

- Biodiversity initiatives and wider environmental improvements

We do not consider these to be an appropriate use of revenue as they are not necessarily reducing the amount of waste sent to landfill or ameliorating the harm caused by landfill sites.

- Tackling poverty and deprivation in communities

We do not consider these to be an appropriate use of revenue as they are not necessarily reducing the amount of waste sent to landfill or ameliorating the harm caused by landfill sites. The solutions to poverty and deprivation do not lie in small-scale, local initiatives.

- Other (please specify)

We would support locally-determined schemes of most types that are based in communities directly and adversely affected by landfill sites. The current list of types of schemes – e.g. funding for places of worship – is not rational and should be scrapped.

**Question 29: Do you have any thoughts on the possible administrative model?**

The existing administrative arrangements should be scrapped in total. A new scheme should be easily accessible, have a light administrative burden and a quick turn around. As already mentioned several organisations have considerable expertise administering small, community grants and their experience should inform any new scheme. We suggest that if possible the Welsh Government should delegate the administration of any revenues to appropriate third parties rather than doing so itself.

While we welcome landfill operators (and the wider waste industry) demonstrating their corporate social responsibility, we do not consider that they need to do so through a Landfill Credit scheme. There are many other ways that they can be socially responsible.

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