



### **Red Industries Scrutiny committee reply**

#### **A - Publicly acknowledge the extent of public concern relating to the impact on the community from the operation of the landfill.**

*It is clear that there is public concern in the local area, and we are happy to work with partner groups and agencies to address these concerns. Indeed, this acknowledgement of local concern is the reason why we took the decision to voluntarily curtail some activities at the facility for a temporary period whilst we accelerate our engineering program. We were already focussed on driving through the engineering program but realise that the wider community wanted to see our commitment, hence the decision.*

*We welcome sensible dialogue with partner agencies as to how effective communication is achieved with local residents as the sharing of information via the liaison group (required by the planning permission) is not as effective as it should be as too few members share information and those that do can be criticised for doing so. Notwithstanding this we will explore other avenues of communication away from this forum.*

#### **B – Proactively manage the matters of concern, rather than awaiting enforcement action to remedy public concerns**

*We cannot accept that there is any complacency on our part in addressing matters relating to the site. This is simply not substantiated by any previous regulatory or enforcement history. Indeed, the facility, was one of the first to successfully transition to the new international ISO45001 health and safety system standard. Rather from our point of view, the key is effective communication of the activities, monitoring and operation of the facility.*

*As above we welcome sensible dialogue with partner agencies as to how effective communication is achieved with the local community and will explore other avenues of communication.*

#### **C – Investigate and Implement operational procedures to emulate best practice to mitigate odour rather than statutory minimum**

*It is not correct that we work to statutory minimum standards. The site is permitted under a regime which requires all environmental controls and operational standards to comply with Best Available Technique ('BAT'). This framework extends throughout the UK and across Europe and constitutes an amalgamation of the best practice operated to by EU member states.*

*We are confused by the council's recommendation that we should emulate best practice to minimise odour. Our permit requires us to adopt best practice as a matter of course and include conditions relating to odour control.*

*Furthermore, this is not borne out by the regulatory and enforcement history at the facility. We pay for external auditing of the facility through BSI (British Standards Institute) and employ specialist environmental consultants to advise on various operational measures and procedures and in retaining our accreditation we implement a programme of continual improvement.*

*Notwithstanding this we regularly engage third party consultants and specialist suppliers to advise us on a broad range of subjects including operational and environmental control systems at the landfill.*



**D – Provide real-time on-site air pollution on a publicly accessible forum**

*It has been widely acknowledged that there are challenges in locating equipment that will provide reliable meaningful data on such matters. We understand that this could provide increased confidence in the wider area along with protecting us. We are consulting with specialists on this matter and will report such outcomes at future liaison group meetings so we can assess and make recommendations. Such research and development work aligns completely with the key objectives of the liaison group, to review information, make recommendations and communicate effectively with local communities.*

**E – Regularly and routinely provide community engagement and liaison outside of the liaison committee. Providing updates to the surrounding community in relation to activities on site.**

*Unfortunately, the sharing of information via the liaison group has not proven to be as effective as it should be. Too few members choose to share the information provided and others may be criticized for doing so. We are happy to take advice from partner agencies and communications experts in how to achieve communication objectives. Having reviewed work at other environmental facilities we would think that a good place to start is a dedicated FAQs section on the facility as there are a number of questions that are consistently asked such as opening hours, types of waste received, height of the waste etc.... that could be visually addressed on such a web page.*

**F – Appoint independent community representatives for odour assessment, rather than using on-site staff who are more familiar and potentially desensitised to the odour. Emulate best practice as per previous operator Lafarge.**

*As you will appreciate at the time of acquisition, we had an extensive hand-over with the previous owner and there are no records of the utilisation of independent community representatives for odour assessment, if the council wishes to provide them to us, we will happily review and comment accordingly.*

**G – Liaison committee to be extended beyond the prescribed minimum to include community liaison groups and public health representatives. A public questions section to be added to the standard agenda and for all meetings to be webcast**

*The liaison group already makes invitations to a membership beyond that set out in the planning permission and it is disappointing that many of those invited have chosen either not to attend at all, or to attend infrequently. The key to success of the liaison group is the invitation of local stakeholders that are prepared to attend the meetings, attend the facility to understand operations, engage respectfully and factually and share information effectively.*

*Again, we would take advice from partner agencies on who these persons may be, certainly we would need to reach out to residents' representatives, some of whom are already invited to see how this may be achieved. Certainly, the submission of questions and webcasting are worth considering provided the engagement is respectful, factual, and objective.*



**H – Publish Red’s environmental management plan, including complaints received, investigation reports and findings**

*We are happy to work with partner agencies to discuss the best way of taking this forward and to engage with local stakeholders to better enable them to understand how the facility is operated, and the extensive measures taken to ensure the highest environmental standards.*

**I – Enhance the quality and extent of daily cover to prevent and improve odour, wind-blown litter, and gull control**

*We are not aware that daily cover has been described as requiring improvement by the experienced regulator and this issue was not raised by them (the EA) during the course of the meetings held as part of the Scrutiny Committee. We import large quantities of soil and other suitable material for daily cover which is used extensively at the site.*

*As a precaution we are already installing secondary litter netting and bunding at the facility.*

**J – Undertake proactive litter picking off-site, when necessary**

*Litter picking is already undertaken by Red in the local area, albeit of late on the advice of the police we have been advised not to wear Red Industries branded workwear. We would appreciate the council and MP making it clear, as they have chosen to do for other people carrying out their job in the area, that employees of Red Industries are in this area carrying out their work and should be able to do so visibly. We would appreciate your support and acknowledgement that there are several sources of litter in the area, including from non-landfill traffic, and that Red Industries does not differentiate between such sources when we litter pick. We would also appreciate the cooperation of the relevant areas of the council/county council so that our teams can safely pick the car thrown rubbish in the hedgerows on the un-paved side of Silverdale Road. We would further propose that a dedicated email address, such as [litterpick@redindustries.co.uk](mailto:litterpick@redindustries.co.uk) is created for residents to report matters relating to landfill generated litter. This would enable Red to be informed without the need to scour social media and ensures that the information arrives with us so we can take prompt action.*

**K – Communicate to all customers requirements relating to no overnight parking on Cemetery Road**

*This has been done on many occasions previously, and we are totally comfortable to continue to do this. We would also propose introducing a dedicated email address to report discourteous drivers to, perhaps [HGV@redindustries.co.uk](mailto:HGV@redindustries.co.uk). This way we can take prompt targeted action without the need to scour social media to find such information.*

*We reiterate our offer to fund road marking and associated signage to make Cemetery Road a clear-way, making it an offence for vehicles to stop on this road. We are happy to go further and provide signage and planting that makes it clear the layby is primarily for those visiting the cemetery.*

**L – Accelerate the program of temporary capping and permanent capping on site**

*As already stated, this is underway and is being applied to areas where it is currently feasible to do so.*