

1. Do you broadly agree with the proposed role for Government?

The preparation and publication of a national waste prevention programme is a key opportunity for the Government to make a meaningful contribution to the European Commission's vision of "Europe 2020 – A Strategy for Smart, Sustainable and Inclusive Growth"¹, and its flagship initiative "A Resource-Efficient Europe"², and "Roadmap to a Resource Efficient Europe"³ that the Government will have accepted at the European Council. The European member states have accepted here the environmental and resource-security needs to start transforming the ways in which we manufacture, consume and dispose of goods (and services), and the role of government policies and legislation in providing the institutional framework and incentives for organisations and individuals to all play their part.

Whilst the North London Waste Authority (the Authority) broadly agrees with the proposed role for the government, we do not consider that the consultation draft Waste Prevention Programme for England provides a sufficiently clear or strong role for the Government. There is scope for the Government to expand more on their remit and to take a more strategic role in the implementation of the Programme as part of a wider programme to reduce our use of and reliance on natural resources that often originate from other parts of the world.

The Government should demonstrate stronger leadership within the Waste Prevention Programme and demonstrate a proactive and holistic approach by setting more sophisticated objectives and targets for waste prevention which would consider both weight-based as well as impact-based approaches. For example, the Government can offer a pool of indicators that assess environmental, social and/or economic impacts of waste prevention activity so that progress can be monitored. Targets should also be set at different levels, namely local, regional and national level to provide clarity on roles and responsibilities of the actors involved.

Details of whether they apply to certain product/waste streams or sectors as a whole should also be reflected when targets are set. The Programme also needs to provide a framework for preventative actions and applied policy instruments per waste stream, taking into consideration the changes in the life cycle of the waste stream; for example, by examining ways of promoting the leasing of white goods to give manufacturers a direct return (and therefore incentive) on making more durable products and that consumers will value (i.e. choose over competitors' products), and which the manufacturer will take back at the end of the product's life such that it doesn't fall to local authorities to collect them.

It is accepted that monitoring progress towards target achievement and the impact of policies is a challenging activity. However, despite the difficulties of monitoring the

¹ COM(2010) 2020 final, Brussels, 3.3.2010

² COM(2011) 21, Brussels, 26.1.2011

³ COM(2011) 571 final, Brussels, 20.9.2011

impact of waste prevention activity, a set of measurement mechanisms and evaluation frameworks should be proposed to provide direction. For this purpose, development of baseline data against which prevailing performance will be reviewed and updated on a regular basis is also essential. The Authority supports the development of a set of indicators that would complement the proposed metrics, which would not only assess changes in waste arising but take into consideration factors such as social and economic benefits, too, e.g. jobs creation and money savings to residents.

The consultation draft of the Programme is additionally in the Authority's view, lacking practical actions by the Government, and a systematic and structured analysis of methods that would encourage consumers to adopt less wasteful behaviours. The Programme needs to be supported by an appropriate level of effort on national awareness campaigns to impact on material demand and a supportive national framework to influence supply. National campaigns can raise awareness of priority waste streams, which can then be localised by local and regional authorities and lead to behavioural change.

As well as behavioural change, investment in infrastructure and action from the manufacturing industry will play a key role. Better design and material choice by manufacturers and an increased government focus on producer responsibility programmes will help influencing consumer behaviour. Policies that induce innovation need to be included in the Programme with more sustainable product design at the 'front-of-pipe'. Such policies will lead to more sustainable practices and enable consumers to better prevent or avoid waste and consequently avoid reliance on 'end-of-pipe' solutions. More sustainable product design can lead to products containing higher levels of recycled content and will ensure that material will be used again in the manufacturing of new products.

2. Do you broadly agree with the proposed role for Business?

There are clear economic incentives for the reduction of waste from businesses and undoubtedly businesses have made significant progress and played an important role in reducing the environmental impact of waste generated. Nevertheless, more can be done to build on recent improvements.

The Authority considers that there is a need for a more effective programme of action with manufacturers and retailers to prevent waste, and that this should be included as part of the Waste Prevention Programme for England. Voluntary agreements such as the Courtauld Commitment are already in place but there are gaps in the current programme of action. The Programme should include an action for the Government to encourage supermarket chains and others in the food supply and distribution market to help consumers reduce food waste and also ensure that surplus food goes to those in need. This gap must be filled in order to maximise reduction potential.

The finalised Programme also needs to consider agreements and commitments that can be extended to trade associations who can be encouraged to devise their own waste prevention plans, which can then be cascaded to their members.

In line with the Producer Responsibility principle, further work with retailers should be fully integrated throughout the Programme which also needs to address waste streams such as packaging waste, which remains a real issue for the general public and for local authorities who must arrange and pay for its recycling, recovery or disposal.

Targets and requirements for businesses should be set, supported by on-the-ground support for obligated companies, especially Small and Medium Enterprises (SMEs) who can play crucial role in promoting purchase of more sustainable products. Transferring best practice to SMEs can yield major environmental gains who would also benefit from awareness training programmes where they can learn about their requirements and financial benefits of reducing waste, whilst receiving advice on how they can positively influence purchasing habits.

Despite recent successes such as the Courtauld Commitment and the Hospitality and Food Service Agreement, the Programme needs to consider methods of encouraging businesses to adopt practices such as promotion of returnable and refillable products and investment in less wasteful product design. However, a precondition for that is investment in infrastructure, which the Government should ensure they build the foundations for, with the intention that businesses will be enabled to accept such products

Whilst the consultation does not seek responses on recycling, optimal collection methods for businesses also need to be addressed as a means of reducing the environmental impact of businesses. More work is required with regards to labelling too. Mandatory labelling relating to the recycled content of products and environmental product declarations with regards to the impacts of packaging will allow consumers to choose more environmentally friendly products.

The NLWA believes that it would also be effective for the Government to focus upon particular sub-sets of businesses with which to promote the financial and commercial value of resource efficient business models. Either a geographic or sector specific approach could be taken.

3. Do you broadly agree with the proposed role for Local Authorities?

The role of local authorities has been highlighted in the consultation document. However, as waste prevention is not one behaviour pattern, but many, there is a need for a multi-faceted approach to be included in the Programme which combines a variety of measures linked to waste prevention attitudes and behaviour patterns,

and to different waste streams. The consultation draft Programme is too limited in the role it envisages for local authorities.

The Authority has developed a range of informational strategies to target each waste stream individually accompanied by easy-to-use instructions for residents. More extensive behavioural change campaigns have also been developed aiming to encourage residents to try new activities that develop into routine habits. The Authority believes that the profile and visibility of waste prevention can be significantly raised by identifying specific activities in which residents can actively participate.

However, with the current pressures on local budgets and the challenge posed by lack of robust methodology and monitoring systems to measure waste prevention, justifying expenditure on waste prevention activities remains a big barrier for local authorities. The Government might wish to contemplate including some guidance in the Programme about the indicative proportion of the local authority waste services budgets that might appropriately be set aside for waste prevention activities, subject to local circumstances. We suggest that the Programme should ideally include some guidance as suggested or some examples and/or case studies of authorities that have active, developed waste prevention programmes, their relative budget for waste services, and what tonnage they have diverted as a result. The North London Waste Authority's 2013/14 budget for waste prevention is 1% of its budget for the management and provision of current waste services and as a result diverted 9,000 tonnes from disposal. An overview of the Authority's waste prevention programme for 2012-13 has been included to our response as Appendix 1.

The Programme should detail precisely the support local authorities will receive in delivering their role as part of the Programme's implementation and it should make some commitment regarding the, funding streams that would be available to support waste prevention activity and interventions on a local level. This is necessary in order to assess the likelihood of success in implementing the Programme.

The suggestion for promotion of waste prevention amongst businesses is welcome and it is an activity the Authority already undertakes. However, it should be noted that for as long as the financial benefit for reducing business waste falls to the producer rather than the local authority, combined with the fact that local authorities' focus is largely on household waste, there is a limit to the level of activity that local authorities can undertake to promote waste prevention amongst businesses. Therefore, it is rational that on a local level, activity to reduce household waste will be prioritised over interventions focusing on commercial waste.

As suggested in the consultation, regular fora with local authorities to share best practice would be welcome. However, for the fora to be of practical benefit it is necessary that there is involvement from central government representatives that can take forward an integrated mix of measures, actions and recommendations that that can be subsequently applied on a national level. For major priority areas such as

food waste and bulky waste re-use it is suggested that separate fora are formed with specialist representatives of waste producers and the waste management industry.

The Waste Prevention Programme additionally needs to acknowledge that local authorities can only influence the demand side aspects of waste prevention, rather than the supply side aspects which are the responsibility of producers. This is not mentioned in the consultation. As noted from the outset, the Authority believes that the Government should consider how the shared responsibility for waste prevention distributed amongst relevant actors and how it is communicated as part of any overall campaign for resource-efficiency in our society.

4. Do you broadly agree with the proposed role for Other Organisations and Individuals?

Supporting the development of the community sector and other partnerships to deliver effective re-use services is one of the objectives of the North London Joint Waste Strategy as adopted by the eight partner authorities in February 2009. Furthermore, the third sector has been identified as one of the key stakeholders for the effective delivery of the Authority's Waste Prevention Plan with their contribution being vital for the development of re-use activities.

National research demonstrated that third sector channels achieve higher re-use rates compared to the bulky material that is channelled through local authority collections and Household Waste Recycling Centres (HWRCs). According to Defra's Household Waste Prevention Evidence Review published in June 2009 which assessed policy-relevant evidence for reduction in the amount of waste generated, material collected from third sector organisations is also of higher value and quality compared to local authority collections that mainly collect low quality bulky waste.

Community and voluntary organisations also need to be supported in order for them to be efficiently developed. Existing networks other than furniture (e.g. Freecycle and Freecycle) need to be addressed in the Programme too as they can offer promotional support for accredited repair and re-use services. A national behaviour change campaign that changed people's attitudes towards second-hand items, presenting them perhaps as 'pre-loved' (as some companies do) or other suitable messages and images may help encourage more resource-efficient choices by consumers

The Authority believes that the vital role of the community sector has been overlooked in the consultation document - the sector includes critical actors in reducing waste arising through re-use activities in particular - and this needs to be acknowledged in the final Programme.

Concluding remarks

The Authority expected the Programme not only to set a framework but provide some detail into the type of activity that would be effective to implement it, in order to assist local and regional authorities setting objectives and programmes into the future. Our comments are accordingly made in the light of this expectation. If it is instead the Government's intention to develop specific objectives and responsibilities as an outcome of the consultation, the Authority will be happy to assist in any way it can, having already shared its substantial evidence base in response to the Government's preceding 'call for evidence'.

Even though the consultation document may meet the minimum requirements and ensures compliance for the Government under the revised Waste Framework Directive, the Authority is concerned that it is insufficiently ambitious to drive change and contribute to a circular economy. The Authority is additionally concerned that it has some key omissions as described in the above sections, which mean that its value as a strategic document setting the vision and an associated implementation programme for waste prevention in England is somewhat limited.

It has been noted that no new policy commitments exist to act as catalysts for change and move towards a circular economy. Lack of concrete objectives and weak measurement mechanisms in combination with an end-of-pipe approach, result in the Programme not being sufficiently comprehensive in relation to the production, consumption and discarding of goods and services in order to meet the future challenges of moving to a resource-efficient economy and society.

The Authority would therefore suggest that the final Programme needs to be substantially enhanced from the consultation draft in order to engage and encourage all actors in its implementation and to ensure that we effectively deliver and measure England's progress towards a less resource-intensive and more sustainable society.