

**North London
Waste Authority**

Unit 1B
Berol House
25 Ashley Road
Tottenham Hale
London N17 9LJ

T 020 8489 5730
E post@nlwa.gov.uk
W nlwa.gov.uk
wiseuptowaste.org.uk

By email to: wasteprevention@defra.gsi.gov.uk

30 January 2015

Dear Sir or Madam,

**Ref: Clarifying the applications of the definition of waste to re-use and repair activities-
Discussion paper - North London Waste Authority Response**

Thank you providing North London Waste Authority (NLWA) with the opportunity to respond to the discussion paper relating to the clarification of the applications of the definition of waste to re-use and repair activities, as issued in November 2014.

NLWA is one of the six statutory joint waste disposal authorities in England and one of the four in London. It is the second largest waste disposal authority in England, handling circa 800ktpa tonnes per annum of municipal solid waste (MSW) from the following boroughs: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

Since 2007, NLWA has been running an extensive waste prevention programme. The aim of the 2014-16 North London Waste Prevention Plan is to reduce municipal waste arisings in north London, promote resource efficiency and improve the local environment through a comprehensive and sustainable programme of waste prevention activities. The Plan has an annual budget of £465,000 and it is estimated that through the two-year waste prevention programme, nearly 20,000 tonnes of waste will be diverted from disposal. Progress towards targets is tracked through diversion rates to indicate the proportion of a waste stream which is managed through waste prevention as opposed to disposal, or through metrics. NLWA responded to the consultation for the Waste Prevention Programme for England and, prior to that, to the Waste Prevention Call for Evidence that led to the publication of the Programme in 2013.

NLWA Comments on the discussion paper:

- As a waste disposal authority, NLWA does not have any direct additional examples where the definition of waste acted as a barrier to re-use and repair activity. Other practitioners in the sector, such as the Furniture Reuse Network will be better placed to provide such information.
- However, NLWA regards the discussion paper of great importance particularly because the interpretation of the definition of waste may be an issue for the companies and organisations to whom we have contracted re-use and repair services, such as WEEE and furniture re-use and repair schemes.

- NLWA is broadly supportive of any discussions that aim to clarify the *interpretation* of the definition of waste and welcomes the suggestion for greater clarity on its application.
- However, any suggestion of changes to the definition of waste itself could increase the risk of illegal trade, i.e. there is a risk of opening up the re-use market to illegal trade in what used to be waste, especially with regards to Waste Electrical and Electronic Equipment (WEEE).
- The Authority also takes this opportunity to highlight the need for regulatory control and enforcement, lack of which can deeply damage the reputation of the re-use and repair sector. Therefore any discussions about the interpretation of definition of waste should not result in greater risks for example as a result of potentially hazardous products and hazardous waste no longer being subject to the appropriate regulatory controls.
- The Authority would like the discussions to result in greater consistency in the application of the definition of waste to reuse and repair processes for all those involved in re-use and repair activity, i.e. consistent interpretation of the regulations across all those involved in providing reuse and repair services. Greater consistency of interpretation should also assist Government in its role in ensuring that resources are managed in as environmentally and socially effective ways as possible as greater consistency of interpretation will assist with measurement and thus ensure that the positive impacts of reuse and repair are fully captured.

Finally, NLWA also supports processes that ensure better communication across different sectors such as public, private and third sector as well as between those operators working in waste management and those who are working primarily in product reuse and repair. The creation of a working group which will examine the issues, with a view to developing an action plan, and develop trial approaches in different sectors to help remove some of the barriers to re-use and repair that occurred through the current application of the definition of waste will assist with improved communication between the different sectors. The Authority fully supports the creation of a working group.

It is hoped that our comments are helpful. However, if you have any comments or queries please contact us on tel: 020 8489 5665 or email: post@nlwa.gov.uk

Yours faithfully,



David Beadle
Managing Director
North London Waste Authority