

By email to:

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24 May 2013

Dear Sir/Madam

REVIEW OF DEFRA'S FUNDING FOR WRAP IN ENGLAND

NLWA is the second largest waste disposal authority in England in terms of tonnage of material managed and is one of four waste disposal authorities in the capital. Local authorities in north London collect circa 850,000 tonnes of municipal waste per annum.

The Authority has long standing experience of working with WRAP, both at a national and regional level, because in London the London Waste and Recycling Board (LWARB) and WRAP work together in a number of areas, in particular to provide communications support, disseminate good practice and offer efficiencies and other technical support to local authorities in the capital, and to fund recycling and reprocessing infrastructure in the city. In some areas LWARB grant fund WRAP to undertake this work.

In terms of specific support to the Authority, the NLWA has historically benefitted from WRAP waste prevention and communications advice. WRAP additionally appointed and funded communications experts to assist in the development of a joint recycling communications initiative between the seven north London boroughs (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) and the Authority. Additionally the Authority has utilised WRAP national branding on communications materials, uses the WRAP photographic library of stock images to avoid the cost of taking its own photographs where possible and signposts residents to nationally provided resources and advice on waste reduction in particular. Authority officers also use WRAP reports and resources as reference material for research and reports and officers have additionally benefitted from attending free-of-charge WRAP training

courses on a range of subjects. The north London boroughs have additionally directly benefitted from WRAP service support in a number of areas.

However, despite this clear support from which north London has benefitted, in the Authority's experience WRAP could do more to embrace the skills within local government and industry more effectively than it may have done in the past. The benefits of a national organisation are that it can often take forward initiatives more cost effectively and develop programmes that cut across more than one sector, more effectively than local organisations. However, the delivery of those national initiatives is often a local matter and in order to be effective, in the Authority's view, WRAP needs to embrace the localism agenda more clearly. WRAP can clearly provide value by delivering work at a national level which reduces costs at the local level, such as the development of national communications resources for shared local use, but local authorities are best placed to understand how to interact with local communities and particularly in the current financial climate need to be brought more effectively into the WRAP delivery framework.

Similarly WRAP can provide a national resource of sound science and statistics on which local authorities and other local organisations can base local delivery programmes, but local authorities are in the Authority's view in the best position to deliver the initiatives to their local residents.

A closer relationship with local authorities by WRAP may also influence the organisation's position on key issues so that it is more attuned to the local impact. A specific example where the Authority found WRAP's stance particularly surprising was in the area of commingled recycling and the Judicial Review of the government's transposition through the Waste (England and Wales) 2011 Regulations of the separate collection requirements of the EU Waste Framework Directive. Bearing in the mind the importance of commingling to local authorities, its importance in increasing recycling rates, coupled with Defra's own supportive stance on commingled recycling collections, it was extremely surprising that WRAP was almost silent on the issue. As an authoritative body in the field, with relevant knowledge and expertise and given the fact that a successful challenge would have resulted in a reduction in recycling, the Authority expected a more publicly supportive stance on commingling being voiced by the organisation. A closer relationship with local authorities may have changed this position.

Where local or regional additional delivery organisations also exist it would be helpful if a review was undertaken of WRAP's interfaces with such organisations to ensure that any duplication was being avoided and to again ensure that local requirements were being

taken fully into account. In London the Authority would suggest that a review of WRAP's relationship and interface with LWARB would be helpful.

There is a risk in the Authority's view, that despite WRAP's excellent work in many areas that it is not capitalising sufficiently well on expertise in the public and private sectors, particularly that at a local level. To be more effective in the future the Authority considers that WRAP needs to reconsider its relationship with local authorities and how it encourages the participation of the wider waste community in local delivery of national programmes.

The final point the Authority would make is that increasing landfill tax has provided a clear Government signal to all to move away from landfill disposal to activities higher up the waste hierarchy. However, at the same time as it has increased landfill tax the Government has moved away from using the funding generated by higher landfill taxes to support more sustainable waste solutions and the infrastructure that is required. Future models of delivery of WRAP's work should be funded by arguably being pegged to landfill tax income as the work that they deliver is focussed upon activities that move us away from landfill disposal. Therefore, whilst the Authority recognises that organisations such as WRAP must play their part in reducing the deficit, it will be important that any cuts to WRAP's budget are carefully considered given the role that they play in moving us towards a more circular economy.

It is hoped that all the comments above and those which follow prove helpful; please consider the comments in this letter as part of our formal response in addition to our answers to the questions provided. If however you have any comments or queries please do not hesitate to contact me on tel: 0208 489 1412 or email: tim.judson@nlwa.gov.uk

Yours faithfully

Tim Judson
Director of Procurement

1. Where are the most important market failures? Where is there still a need for government to fund activities to support waste reduction and resource efficiency policy in England?

The Authority believes that the most important market failures are in the following areas; WRAP is not the best placed organisation to address all of these failures so the comments below also highlight where the Authority believes WRAP has a role in addressing them and where it does not:

I. Market development on the use of materials

Greater support must be provided to market development on the use of materials with a particular focus on materials where commercial markets are difficult. Local authorities and other public authorities have a role to play in supporting business development and in green procurement. Joint working by waste disposal authorities may be helpful in ensuring an appropriate volume of material to allow market development.

Consistent with market development, the Authority recognises that local authorities and others should continue to strive for systems which deliver good quality materials, including through the use of high quality Materials Recovery Facilities. Commingled collection systems can deliver the necessary quality cost effectively, so a key role for WRAP should be to ensure that quality protocols are developed and implemented and that end market development takes place for the increasing numbers of materials which may be able to be separately extracted from commingled systems.

There is also a need for government to continue to fund WRAP's activities which provide information about materials markets in England and to continue to fund WRAP's activities which assist in the development of those markets. This is particularly important in the light of emerging economies' increasing emphasis and investment in developing their own circular economies, which might result in the reduction or closure of some currently important overseas markets for specific UK generated recyclates in the medium to long term.

The effect of an uncertain policy framework has frustrated investment in new treatment capacity and innovation. The potential benefit of investment in the green economy and jobs is not being realised. WRAP may be able to play an important role in identifying the impact of the policy framework on new treatment capacity at a national level. However, as noted in the Authority's introduction to this response, there may be other organisations such as LWARB in London which may also be equally or better able to

carry out this role, particularly where local knowledge and delivery is required. Accordingly the Authority recommends that a review is undertaken of how LWARB and WRAP interface in London and if appropriate, that a similar review is undertaken of WRAP's relationship with other local delivery organisations in other parts of the country.

II. Commercial and industrial waste

A significant effort needs to be made to support the delivery of infrastructure to treat commercial and industrial waste more sustainably, especially where this arises from small and medium sized firms. Local authorities can play a useful role including providing access to HWRC capacity and in providing anchor contracts to underpin investment in new infrastructure. Government should support such steps, although the Authority would only be supportive of such an approach if local authorities were funded to take these materials and on the basis that local authorities don't simply become the 'dumping ground' for residual waste from other sectors.

The Authority does not consider that WRAP should have a role in delivering funding arrangements for the development of commercial and industrial waste treatment infrastructure. Organisations such as joint waste authorities, the LGA or regional organisations such as LWARB may also be better placed than WRAP to negotiate and/or fund such arrangements. However, WRAP does have a role in providing a national resource of information about reprocessing needs and capacity requirements to support such arrangements.

III. Smaller scale merchant waste infrastructure

Whilst the establishment of the Green Investment Bank (GIB) is most welcome the GIB is primarily concerned with supporting municipally sponsored infrastructure or those merchant projects that are being developed by those with strong covenant strengths. As such, there is currently a lack of funding for small to medium scale merchant waste infrastructure where such plants are being developed by smaller developers. Whilst this may not seem an immediate priority for local authorities, the ability to handle and reprocess niche waste streams of regionally or industry specific wastes in a more sustainable way can provide much needed investment, jobs and environmental benefits so should not be overlooked¹. There is still a need for government to fund activities to assist in providing investment support and advice for smaller scale

¹ According to the Federation of Small Businesses at the start of 2012 small and medium enterprises (SMEs) employed 14.1 million people and had a combined turnover of £1,500 billion in the UK and accounted for 99.9 per cent of all private sector businesses of which there were 806,000 in London.

merchant waste infrastructure, although the Authority does not consider that this should be a specific role for WRAP.

IV. Regulation of waste exports

The regulation of waste exports is insufficient and is coupled with insufficient financial incentive for materials suppliers not to export material. A range of other factors including potentially contamination levels and the use of PERNs for whole loads also increases the attractiveness of overseas markets. This has the effect of undermining investment in the UK as well as giving rise to environmental difficulties overseas. Whilst the regulation of exports is clearly not a role for WRAP and should be the role of the EA, the Authority recognises that WRAP has considerable expertise in material quality e.g. WRAP's work on the MRF Code of Practice, which could potentially be emulated in other areas. WRAP may also be able to provide supporting information regarding the development of new local markets if materials that were previously exported have to be further sorted for more local recycling than they were in the past.

V. Resource efficiency in manufacturing and retail

The government also needs to continue to support discussions with manufacturers and retailers to reduce the amount of waste arising from the production, distribution and retailing of manufactured goods. WRAP is well placed to provide a delivery mechanism to facilitate such discussions as it has done with the development of the Courtauld Commitments 1, 2 and 3.

However, having said that WRAP is well placed and should continue to be funded to facilitate this work, the Authority would argue that the targets in Courtauld for example are insufficiently ambitious and that it is important that WRAP engages with local government more effectively than it has done in the past when developing such initiatives. For example in the Authority's experience, WRAP had little to no engagement with local government on Courtauld 3; this was a missed opportunity and a further example of the point made in our introduction to this response about WRAP's perceived failure to embrace the skills within local government and industry as effectively as it might have done in the past. Developments such as Courtauld have an impact on both the private and public sector services, for example the Authority wrote to local companies about the Courtauld Commitment to encourage them to sign up, so it is important the WRAP engages with local government on such issues, even if they may not at first sight appear to have a direct impact on the sector.

VI. Waste minimisation

Waste minimisation should remain an important priority. The Authority supports Defra's strategic guidance to WRAP for 2013/14 regarding prioritising food waste prevention and promoting resource efficiency in the construction sector. WRAP should also play a key role in the development of the Waste Prevention Programme for England by December 2013 for which the Authority recommended a prioritisation of food, textiles, (including non-clothing textiles), furniture, WEEE and packaging. However, effective waste minimisation will result from a combination of supply and demand-side measures, i.e. including both design and manufacturing interventions on the supply side and work on changing householder attitudes and behaviours on the demand side of the resource efficiency equation. WRAP is well placed to deliver the strategic initiatives, particularly regarding supply initiatives, but it is also vitally important that the organisation works with local government collection and disposal authorities on the demand side of the work programme. Local authorities are closer than WRAP to householders and potentially more able to influence householder attitudes. Waste minimisation is best if it is a combination of strategic initiatives and local activities. It is vital that WRAP engages with local government collection and disposal authorities in order to deliver an effective programme of local activities that can contribute towards the over-arching strategic implementation of a national waste prevention programme.

The recent Defra call for evidence on the programme noted the following key market failures in terms of waste prevention. The Authority agrees with these failures and considers that WRAP could also assist in providing the evidence base and research and testing necessary to overcome them:

Environmental Externalities: The consumption or production decisions made by individuals and businesses that lead to waste creation may not take into account the environmental damage caused by that waste. The full cost of waste may not be paid for by its producer.

Split Incentives: In many cases the beneficiaries of waste prevention actions may not be the same as those who incur the cost of those actions. For example, a manufacturer may invest in re-designing a product to reduce waste (such as extending product lifetime), but the beneficiary may be the consumer or local authority further down the line. In this way there may be little financial incentive to take preventative actions for those who are able to do so.

Information Failures: Consumers or businesses may not be aware of the value associated with waste efficiency savings; they might fail to appreciate the full costs of waste (for example, unnecessary raw material and labour costs embedded in products); or they may be unaware of the preventative actions which could be taken. Furthermore, information may be too costly to acquire (in terms of time and resources).

Behavioural Barriers: Status quo bias can be a potentially significant barrier to firms¹⁷ where companies underestimate the value of long-term benefits versus short-term costs and/or overestimate the risks associated with such investments. Additionally, individuals may experience loss aversion and place more emphasis on the upfront costs compared to the long run benefits they may get through making a change.

Financial Barriers: Certain waste prevention actions will require an initial investment before benefits can be realised. If businesses or individuals have constrained access to credit then they will be unable to make the investment to realise the subsequent benefits.

There remain significant risks that waste growth could exceed Central Government projections in the medium term and that nationally there is insufficient capacity to divert waste from landfill and to meet international obligations. It would be inappropriate for Central Government to pass on any EU fines to local authorities given the role that the national policy and fiscal frameworks play, but there is a need for government to fund activities that provide the necessary evidence base to ensure that the effectiveness of the fiscal and policy framework to deliver our prevention goals continues to be measured.

2. Where are there business barriers to the take-up of cost-effective resource efficiency measures? Where is it possible to move to a private sector-funded approach?

The Authority believes that the barriers exist in the following areas:

I. Funding

Whilst the Authority does not consider that this is an issue for WRAP, a more stable policy and fiscal framework is required to support long term investment decisions, whether by local authorities or private sector firms. Government has been slow to review, decide and implement new regulations and fiscal mechanisms such as in regards to the MRF code of practice, renewable obligations support and the renewable heat incentive. There is continuing uncertainty in key areas such as the implementation of the Waste Framework Directive and Carbon Reduction Commitment.

II. Planning

Secondly, and again whilst this is not an issue of interest for WRAP, the planning framework for waste management remains a barrier to successful delivery of waste strategy ambitions. The planning framework should support the commercial delivery of infrastructure including securing economies of scale and allowing the movement of waste across administrative boundaries if this is consistent with achieving the most deliverable and best environmental solution. In particular, refuse derived or solid

recovered fuel should be able to be moved to wherever energy demand exists, providing the best prospect of delivering Combined Heat and Power.

III. Infrastructure

Waste management facilities that primarily treat municipal waste should be treated as community assets for the purposes of Community Infrastructure Levies. However, waste disposal authorities should consider carefully how local communities may benefit from waste treatment developments, including the potential for local energy supply where energy is produced. Again the Authority does not consider this an area of expertise or involvement for WRAP but it is raised as another business barrier to the take-up of further resource efficiency measures and in particular the development of new waste treatment facilities.

WRAP's role in increasing the take-up of cost-effective resource efficiency measures could usefully include a role in championing LGA/local government view points and seeking to secure changes at national level so that local collection and disposal authorities are better and more easily able to provide solutions locally.

3. What is the best way to deliver these activities on Defra's behalf? Which organisations are best placed to deliver (e.g. businesses, local authorities, civil society organisations)? And how can we ensure best value for public money?

Central and local government, businesses, individuals, educational establishments and civil society all have roles to play in delivering on Defra objectives regarding waste minimisation and improved resource efficiency. Many initiatives will require the involvement of a whole supply chain, so cannot be delivered by one sector or part of the supply chain in isolation.

In the Authority's view, local authorities or organisations such as LWARB are best placed to deliver initiatives locally, but they can benefit from having access to a sound information base that WRAP can collect, co-ordinate and provide/deliver nationally.

As noted elsewhere in this response one of the key issues in considering WRAP's role going forwards is the interplay between national and regional/local delivery. The Authority considers it best for WRAP to concentrate on developing and delivering national initiatives that support Defra objectives, with other more local or regional agencies or local authorities or groups of authorities better placed to deliver the local or regional activity. In London, which may be a specific case given the density of population, the size of the city and transient nature of the population, LWARB can provide an effective delivery role, elsewhere individual authorities could do this. The

Authority would suggest that further discussion takes place with WRAP in this regard, perhaps involving other agencies such as the LGA, GLA and CIWM to explore how best to ensure effective delivery at a local level.

4. Which of WRAP's current activities in England do you value most?

One of the key attributes of WRAP's work which the Authority particularly values is the economies of scale that WRAP can deliver on the resource efficiency agenda. However, as already mentioned in this response, the Authority has a key concern about how WRAP identifies the point at which it needs to work with local delivery partners in order to effectively implement its programmes at all levels.

WRAP is also a respected provider of the information needed in this area which the Authority particularly values.

Beyond this the Authority values the following areas of WRAP's current activities:

- I. Production of Quality Protocols and Standards which provide quality standards and have assisted in developing market confidence in recycled materials and providing standard specifications for use in contracts e.g. The Quality protocols for:
 - a. The production and use of quality compost from source-segregated biodegradable waste.
 - b. The production of aggregates from inert waste
 - c. The production of processed cullet from waste flat glass
 - d. The manufacture of secondary raw materials from waste non-packaging plastics
 - e. Anaerobic Digestate
 - f. Tyre-derived Rubber Materials
 - g. Gypsum from Waste Plasterboard
 - h. Pulverised Fuel Ash
- II. Voluntary agreements e.g. Courtauld Commitments 1, 2 and 3 and WRAP's national discussions with manufacturers and retailers which have assisted in increasing the amount of lightweighting of packaging for example, although noting the Authority's aforementioned concerns about the limited level of engagement with local authorities on Courtauld 3 in particular.
- III. Market Development including the work that WRAP has delivered on quality protocols as a means of giving markets confidence in secondary resources such

that a market can then develop. However, to facilitate a future transition to higher recycling rates we may need WRAP to be working now on a series of relatively niche quality protocols or similar in the future.

IV. Communications

By operating on a national level, WRAP is able to run high profile communications and PR campaigns in a way that is difficult to achieve on a local level, in terms of impact and profile, and it makes sense for local authorities to join them in these campaigns in order to achieve the required campaign penetration with the public. Examples of these are the 'Love Food Hate Waste' campaign and the 'Recycle Now' campaigns. Campaign materials are available to download and use locally, which should save local authorities much time and resource on developing their own materials. The effectiveness of these campaigns both nationally and locally whilst measured by WRAP could however be more effectively disseminated so that the benefits of this approach are more transparent.

Unfortunately, the way in which WRAP allows local authorities to use its materials, and adapt them for the local context, is also in the Authority's experience sometimes so restrictive as to make them unworkable. For NLWA, this has resulted in the decision to move away from the national WRAP campaigns and for the Authority to develop its own local campaigns that better serve local needs. In many ways, this is disappointing, not only in terms of Authority time and expenditure but also because the national campaigns are well known, and starting new campaigns locally obviously presents its own challenges. However, to be more effective in its communications role, WRAP needs to recognise that local authorities may have some expertise and knowledge such as knowing their local residents, better than a national organisation and accordingly WRAP needs to allow more flexibility for the national campaign activity to be adapted to best meet local requirements. In short, whilst the Authority considers the communications support that WRAP offers extremely valuable, if it is to provide real value for money it needs to be more adaptable and flexible, otherwise it is difficult for local authorities to fully benefit from the offer.

Communications support information:

WRAP continues to play a useful role as a central hub of research, information, messaging, facts and figures, and resources that are readily available to local authorities to use in communications activities. WRAP continues to be a useful point of reference for waste matters and is also available to provide support and

advice when required and accordingly the Authority continues to signpost residents to WRAP resources because the material is thoroughly researched, readily available and easily accessible for use. In the Authority's view, what WRAP needs to avoid however is that it doesn't duplicate work which would be better carried out by other organisations.

- V. Good Practice Guidance Documents e.g. Improving HWRC performance. WRAP's guides generally offer very practical support which can be used by authorities seeking to improve performance.
- VI. MRF Documents – production of various useful MRF documents and case studies e.g. recovering value from MRFs, MRF Output Material Quality Threshold, MRF Quality Assessment Study, etc.
- VII. Waste Prevention and Reuse – in particular WRAP's evidence work to assist in justifying expenditure on waste prevention and assistance at a local level with prioritisation of waste prevention activities.
- VIII. Waste Management e.g. Site Waste Management Plans
- IX. Training – Authority officers have benefitted from WRAP's modular training programme which is not offered by other providers.
- X. Market Information e.g. Market Pricing Reports and Market Situation Reports which provide authoritative impartial position/status reports.

5. Which of WRAP's current activities in England do you think should be regarded as lower priority for Defra funding in future?

The Authority questions whether WRAP should be funded to provide direct support to local authorities, or to local businesses – this type of support might be better delivered by more local agencies like LWARB in London and Joint Waste Authorities/ Unitary Authorities and County Councils working alongside WRAP.

The Authority would also question WRAP's role in water efficiency. The Authority notes that water efficiency is a priority area for WRAP in 2013/14 as directed by Defra but would question WRAP's role in this area. Potentially Water UK would be better placed to deliver such work, or perhaps a water organisation equivalent to the

Energy Savings Trust or Water Aid or an organisation appointed by the Environment Agency could better deliver such support.

6. What role should Defra fund WRAP to play in the EU or internationally?

WRAP has a role in understanding the international aspects of the sector. Waste management is a global issue and WRAP needs to be funded to understand the global context particularly of food waste and additionally of end market development in a world context. Whilst the Environment Agency may consider international issues regarding regulation and the regulation of recyclates exports for example and Defra clearly has a role in the understanding of and engagement with the development of international legislation on waste, WRAP's role in the international arena can be complementary, for example focussing on end markets, materials standards and developments in new reprocessing approaches. Issues such as recycled product quality and standards in other countries are relevant to England and the UK so WRAP should be supported to understand these too as they potentially affect UK companies' ability to sell material abroad. As an example WRAP has been working on quality protocols but the EA was leading on end-of-waste criteria in Europe. Knowledge gleaned from these processes should be developed in WRAP so that future quality protocol work can, where possible, facilitate not just UK market development, but also open up as many European markets as possible for UK companies.

7. What appetite is there on the part of those who benefit from WRAP's advice and support to make a financial contribution in return?

In principle the Authority considers that WRAP should be centrally funded to deliver a range of national activities for which the organisation can provide economies of scale as discussed above. From a local authority perspective there may be an appetite for contributing towards the costs of reports for example, i.e. for contributing towards resources and materials which can be seen to have an immediate and/or local benefit to an authority. However, the Authority would consider that there is likely to be less support for contributing towards the costs of support which is more generic or which cuts across sectors such as the development of quality protocols and standards or national campaign materials for which it is more difficult to produce an authority specific cost-benefit justification and which may anyway be demonstrably able to show a national cost-benefit to the public sector purse. Existing evidence suggests that WRAP's activities have already delivered benefits to the economy such as the intervention by WRAP quoted in paragraph 12 of the

consultation document in ‘turning the problem of plastic waste into a thriving industry turning over nearly £70 million per year.’”

However, alongside the central support provided for WRAP there also needs to be more localised funding made available if local authorities or other organisations are to deliver the local elements of some of WRAP’s initiatives or alternatively to consider a mechanism whereby WRAP itself had more local resources to work alongside authorities and other delivery partners to deliver the local elements of its programme.

8. If Defra were to reduce its funding for WRAP could this have any indirect effects?

There may be a number of indirect effects if funding to WRAP was reduced:

- I. In the first instance end markets for recyclable materials may not continue to grow. In the absence of a central organisation to develop materials standards and quality protocols, users may switch back to specifying virgin rather than secondary products. This in turn could reduce the carbon and recycling improvements that have been made in recent years as a result of end market development advances.
- II. If funding to WRAP was reduced such that there was no longer a national recycling or food waste reduction campaign in place, the situation could revert to the position before WRAP was in existence, i.e. with each local authority spending time and money developing their own campaign and communications materials and research to back it up. The indirect effect of this would potentially be increased public expenditure as authorities duplicated work and reduced campaign effectiveness as residents would be faced with a plethora of messages from different authorities, waste management companies and retailers, rather than a consistent message and branding supported by national research.
- III. A third indirect effect resulting from a reduction in WRAP funding could be the cessation of voluntary agreements such as the Courtauld Commitment which again could result in no further progress in carbon or other environmental benefits associated with the agreement or at worst a reversal of some of the improvements made to date.

In the Authority’s opinion it would be those WRAP activities and services which users would be less likely or able to pay for that would suffer the most from a withdrawal of Defra funding and this could result in at best no further environmental improvements in these areas as a result and at worst a declining environmental position and increased costs to the public sector in the round.

The final point the Authority would make is that increasing landfill tax has provided a clear Government signal to all to move away from landfill disposal to activities higher up the waste hierarchy. However, at the same time as it has increased landfill tax the Government has moved away from using the funding generated by higher landfill taxes to support more sustainable waste solutions and the infrastructure that is required. Future models of delivery of WRAP's work should be funded by arguably being pegged to landfill tax income as the work that they deliver is focussed upon activities that move us away from landfill disposal. At a time when landfill taxes have continued to rise, and with a lack of transparency regarding what happens to the tax income thus generated it may therefore be more difficult to justify further cuts in Defra support to waste minimisation and other aspects of WRAP's current remit. Therefore, whilst the Authority recognises that organisations such as WRAP must play their part in reducing the deficit, it will be important that any cuts to WRAP's budget are carefully considered given the role that they play in moving us towards a more circular economy and the fact that much of their work may not be directly fundable by users of their services. Arguably WRAP is the only organisation with a clear sole focus on waste management cutting across both the private and public sectors and if their role is diminished in any way through a reduction in funding then this important focus on the resource efficiency agenda could be lost to the detriment to all.

As noted at the start of this response, in the accompanying letter, it is hoped that the comments above prove helpful; please consider the comments in both the letter and our answers to the specific questions provided as part of our formal response.

Officer response