

Appendix 2 – Consultation Responses

i) NLWA response to London Borough of Barnet – Local Development Framework Development Plan Document site suggestions – second call

Site Allocations Development Plan Document Information gathering exercise

Response form: Part 1 This form should be used to provide information in response to Barnet Council's Information gathering exercise.

Before completing the form please refer to the attached guidance notes. One form should be completed for each site put forward, and each site must be accompanied by a site plan on which the site boundaries can be clearly identified (please refer to the guidance notes for more information). If you require the form or guidance notes in a different format, please contact first contact on.

Further forms can be downloaded from www.barnet.gov.uk.

Completed forms should be submitted to the following address by

25 May 2010:

If you are not already on our contact database, and you would like to receive information regarding future consultation events, please provide us with your email address here:

By email: forward.planning@barnet.gov.uk

By post: Planning Policy and Housing Team

North London Business Park (NLBP)

Oakleigh Road South

London

N11 1NP

1. YOUR DETAILS

Name	Barbara Herridge	
Company/Organisation (if applicable)	North London Waste Authority	
Address (incl postcode)	Unit 169, Lee Valley Technopark Ashley Road Tottenham London N17 9LN	
Telephone	0208 489 5654	
Email	barbara.herridge@nlwa.gov.uk	
I am (please tick all those that apply)	Owner of (all or part of) the site	<input type="checkbox"/>
	Planning consultant	<input type="checkbox"/>
	Registered social landlord	<input type="checkbox"/>
	Local resident	<input type="checkbox"/>
	Land agent	<input type="checkbox"/>
	Developer	<input type="checkbox"/>
	Amenity/community group	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/>

2. SITE DETAILS

Site address	<p>The North London Waste Authority has already made representations to the North London Waste Plan Preferred Options regarding the need for land to be allocated for additional household waste recycling centres (HWRCs) to meet its needs as follows:</p> <p><i>The Authority broadly supports the spread and size of sites included in the plan. However, it is noted that previously the Authority requested additional HWRC sites in north east Enfield and three HWRC sites in Barnet. The sites set out at Schedule C do not make allowance for the Authority's requirements and it is requested that the sites are revisited to incorporate appropriate sites. Please note the comments made in response to Question 4 which sets out the Authority's observations on each of the Schedule C sites.</i></p> <p><i>The Authority would be pleased to engage with the NLWP team to develop policies for HWRC provision is (sic) this would be helpful.</i></p> <p>Further correspondence is ongoing in this regard</p>
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	with the North London Waste Plan. This is our principle point of contact and we assume that liaison is taking place. However, if you require further dialogue directly with ourselves in this regard, please do let us know.
Postcode	
Grid reference (if known) e.g. 358269, 172793	
Site Area (hectares) if known	
Current use (please specify last use if vacant)	
Relevant planning history (if known – please include relevant planning application reference number (s))	

3. PROPOSED FUTURE USES & CAPACITY

PROPOSED USE		Use	Tick	Info/Notes
Suggested uses/uses that you would like us to consider for the site. (Please tick all those that apply)		Residential		
		Office, research & development, light industrial (B1)		
		General industrial (B2)/warehousing (B8)		
		Retail		
		Community facilities (please specify)		
		Sports/leisure (please specify)		
		Gypsy and travellers/travelling show people sites		
		Open space		
		Waste management	✓	
		Other (please specify)		
	Other – please specify			

4. SITE OWNERSHIP DETAILS

I (or my client)	Is the sole owner of the site	[]
	Owns part of the site	[]
	Do not own (or hold any legal interest in) the site whatsoever	[]
If owner/part owner, have you attached a title plan and deeds with this form? Yes () No (x)		
If you are not the owner, or own part of the site, do you know who owns the site of the remainder of it (please provide details?)	<input type="text"/>	
Does the owner (or the owner(s)) support your proposals for the site? Yes () No ()		

Do you know who owns the site (whole or part)?

If yes, is the owner aware of your proposals?

Information gathering exercise
Response form: PART TWO

We recognised that the information requested on this part of the form will be easier for owners and their agents to provide. However, to help us assess sites and to understand how deliverable sites are for the uses suggested, we would appreciate as much information as possible.

5. MARKET INTEREST

Please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

	Tick	Comments
Site is owned by a developer		
Site is under option to a developer		
Enquiries received		
Site is being marketed		
None		
Not Known		

6. UTILITIES

	Yes	No	Unsure
Mains Water Supply			
Mains Sewerage			
Electrical Supply			
Gas Supply			
Public Highway			
Landline telephone/Broadband internet			
Other (please specify)			

7. AVAILABILITY ISSUES

Please tell us which of the following issues are relevant to the site.

	Yes	No	Unsure
Land is in other ownership and must be acquired to develop the site			
Restrictive covenants exist			
Current use needs to be relocated			
Physical constraints (topography, trees, etc)			
Contamination			
Access constraints			

Please provide any relevant information of likely measures to address any of the above that you answered "Yes" to:-

8. TIMESCALE FOR AVAILABILITY

Please indicate the approximate timescales for availability

	Tick
Immediately (2010)	
Up to 5 years (by 2015)	
5 – 10 years (between 2015 and 2020)	
10 – 15 Years (between 2020 and 2025)	
Beyond 15 Years (after 2025)	

If you have indicated that the site is not immediately available, please explain why:

9. OTHER RELEVANT INFORMATION

Please use the space below for additional information or further explanations on any of the topics covered in this form (any additional information should be limited to 5 sides of A4):

Thank you for your time. We will be in touch if we require further information. Completed forms should be submitted by 25th May 2010.

(ii) NLWA response to London Borough of Enfield - Consultation on the draft New Southgate Masterplan: Supplementary Planning Document

London Borough of Enfield
Place Shaping Team
PO Box 61
Civic Centre
Silver Street
Enfield
EN1 3XW

26 May 2010

For the attention of Suzanne Johnson

Dear Madam

Re: New Southgate Masterplan

The North London Waste Authority is the statutory waste disposal authority for the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

The NLWA is in the process of procuring future services to manage the waste collected by these Boroughs until 2042. The procurement will require the construction of new waste facilities in the North London area at an expected cost of between £500 and £600 million a substantial part of which will be met by the Authority's partners including the London Borough of Enfield.

It is anticipated that one of the new waste handling operations needed to manage North London's waste until 2042 may be constructed at the site known as Pinkham Way which is located to the south west of the New Southgate area, the west of the East Coast main line and south of the A406 North Circular Road. The site is a former sewage treatment works that has been identified for potential waste management uses in the North London Waste Plan Preferred Options.

As part of this procurement process the NLWA has exchanged contracts to purchase the Pinkham Way site and it is expected that that proposals will be developed for the site as a part of a North London strategy. The finance necessary for the purchase of this site were raised through the Authority's levy on the seven North London Boroughs listed above.

The Pinkham Way site is essential to the Authority's future plans for the development of waste services and facilities for the long term future sustainability of North London and this site is critical in realising this objective. The Authority has recently received £258.4 million of Public Finance Initiative to support this objective.

The scale of the proposed development in the south west part of the New Southgate area means that a residential building is proposed on Regeneration Site 2 which may have relatively good views over the Pinkham Way site. Whilst the Authority believes that the proposed use of Regeneration Site 2 is not incompatible with future waste management development at Pinkham Way it wishes to confirm that any development in this location (including the

wider regeneration proposals for New Southgate) should not prejudice the future development of the Pinkham Way site for waste management, consistent with:

- London Plan Policy 4A.22 which seeks to safeguard waste sites '*with an existing or future potential for waste management and ensure that adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance*'.
- Draft London Plan Policy 5.17 is consistent with published policy 4A.22.
- Draft Policy NLWP2 of the North London Waste Plan which requires proposals for development adjoining identified waste sites (including potential waste management sites such as Pinkham Way) should have regard to the potential waste management use, in particular paragraph 5.15 which states '*Introducing incompatible land uses in the vicinity of the safeguarded waste sites prejudices ... the development of, new waste facilities in the future will be resisted*'.
- Core policy 22 of the Enfield Core Strategy (Submission Version) which seeks to safeguard waste sites identified in the NLWP. Whilst it is acknowledged that the Core Strategy refers to safeguarding sites within Enfield, given the proximity to the Borough boundary the Authority also believes that the Council should safeguard sites in close proximity and that the Council should certainly not do anything that might prejudice the development of infrastructure essential to the management of North London's municipal waste.

The Authority notes that the Council proposes a Combined Heat and Power (CHP) facility as a part of the New Southgate masterplan. There may be synergies between the proposals for Pinkham Way and the proposed CHP. As such there may be value in discussing possible synergies as the masterplan develops.

Please contact me at the above address if you require any further information or to discuss these matters further.

Yours sincerely

David Beadle
Managing Director

(iii) NLWA Response to Department for Business, Innovation and Skills Consultation on the Waste Electrical and Electronic Equipment Code of Practice

Email from Christina Preece
To: Robert.Freeman@bis.gsi.gov.uk
Subject: Code of Practice for Collection of WEEE
Date/Time: 10:56, 30th March 2010

Hello Robert

Please find below our comments in red on the new draft Code of Practice.

'Responsibility of DCF operators

The DCF operator is responsible for:

- Provide access to members of the public to dispose of household WEEE and provide appropriate signage to direct members of the public disposing of household WEEE to the relevant area or container;

A number of the DCFS already registered in our area do not have public access; will this be covered in the new COP?

Treatment of WEEE at DCFs

Operators of DCFs are not permitted to carry out any form of treatment of WEEE on a DCF site unless the site has been awarded AATF status by the appropriate environment agency and evidence is issued to the PCS as required by the Regulations. Such activity includes any form of dismantling – including the removal of cabling, components or parts of appliances such as doors.

Fluorescent tubes are currently disposed on site using a 'tube eater' system. Will this be allowed to continue under the new COP?

Site Management Issues

As a minimum DCFs should set aside sufficient space for:

A Large Household Appliances

B Cooling Equipment

C All Display Equipment ie CRT, LCD and Plasma displays (including TVs laptops and PC screens

D Gas Discharge Lamps

E All other WEEE

Sites therefore are required to accommodate containers of a size and type appropriate for the site for **C- E** and hard standing or containers for **A and B**

Where this is not possible approval may be given for a DCF to collect fewer streams provided:

- Evidence is available to demonstrate the restrictions for collecting fewer waste streams – for example space restrictions;
- All possible avenues have been explored to maximise the number of streams to be collected on site – for example smaller containers, reorganisation of the site or more frequent collections;
- Sites able to receive other streams from the public are within a reasonable distance in the local authority area and are accessible to all on an equal basis.

In such cases as a minimum, DCFs must separately collect hazardous WEEE in line with the Hazardous Waste Regulations and have a minimum of one container for mixed WEEE. Where a site has capacity for further separation of categories under the regulations this must be accommodated.

The operator of the DTS will work with the DCF operator to ensure an adequate coverage for the separate collection of all WEEE categories within geographical areas. The DTS will also discuss with DCF operators the potential to increase the collection streams on individual sites under the DTS approval for the 2010 – 2013 compliance periods.

In order to maximise the amount of WEEE recycled and reused we registered a variety of sites as DCFs which had room for a limited number of streams eg three of our sites can only receive Category C, one receives B only and another is registered for A to D only. Efforts have already been made to maximise the number of streams received at each DCF. If the COP enforced the minimum of one container for mixed WEEE and the provision of space for receipt of hazardous streams B, C and D this could lead to the deregistration of several sites and have the effect of reducing the amount of WEEE collected in the Authority area. Over the geographical area covered by the Authority there is an adequate coverage of all WEEE categories.

Many thanks

Christina Preece
Contracts Manager

North London Waste Authority
Lee Valley Technopark
Unit 169, Ashley Road
Tottenham
N17 9LN

Tel: 020 8489 5731
Fax: 020 8365 0254
Email: chris.preece@nlwa.gov.uk

To find out more about us, visit our web-site at www.nlwa.gov.uk

**(iv) NLWA response to the Department of Energy and Climate Change –
Renewable Heat Incentive Scheme**

Renewable Heat Incentive Consultation on the proposed RHI financial support scheme

Please use the table below as a template to respond to the consultation. It will help us to record and take account of your views.

Also, please provide evidence for your answers and comments where possible.

INTRODUCTION
Q1: Are there any issues relevant to the design or operation of the RHI that are not addressed in this consultation document? If so, how should we deal with them?
Yes/No Comments: Overall, The Authority is content with the RHI and welcomes the introduction of the scheme. The Authority is also pleased to see that SRF is recognised as a renewable fuel.
CHAPTER 1: ACCESSING THE RHI
Q2: Do you see any barriers to such financing schemes coming forward? In particular, are there any limitations in leasing and finance legislation that you feel inappropriately restrict the development of RHI financing models?
Comments:
Q3: Do you agree with our proposed RHI registration and payment approach? If not, can you suggest how this approach can be improved?
Yes Comments: The Authority is content with Ofgem being the administrators of the RHI. The Authority's proposed scheme(s) will be larger than the small and medium scale generation capacity threshold, hence, is unable to comment on the appropriateness of MCS. The Authority is content with the proposed quarterly payments for installations above 45 kW. The Authority's scheme(s) will all be above 45 kW and hence is unable to comment on the appropriateness of annual payments to schemes below 45 kW.
CHAPTER 2: ELIGIBILITY AND STANDARDS
Q4: Do you agree with our approach of requiring products and installers for installations up to 45kW within RHI to be accredited under MCS or equivalent?

<p>Yes/No</p> <p>Comments:</p>
<p>Q5: Where MCS product and installer certification is extended beyond this limit, do you agree that we should introduce the requirement of using certified installers and equipment for eligibility for the RHI?</p>
<p>Yes/No</p> <p>Comments:</p>
<p>Q6: Can you provide details of any UK or European standards that should count as equivalent to MCS? How should we recognise these standards for the RHI?</p>
<p>Comments:</p>
<p>Q7: Do you agree with our proposed approach to eligibility of energy sources, technologies and sites?</p>
<p>Yes</p> <p>Comments:</p> <p>The Authority understands that only useful heating will be supported. The Authority would, however, like to see this extended to the parasitic load of an operational plant, such as heating of a digester in an anaerobic digestion plant.</p>
<p>Q8: Do you agree with our proposed approach on bioliquids? Are you aware of bioliquids other than FAME that could be used in converted domestic heating oil boilers? If so, should we make them eligible for RHI support, and how could we assess the renewable proportion of such fuels to ensure RHI is only paid for the renewable content of fuels?</p>
<p>Yes/No</p> <p>Comments:</p>
<p>Q9: Do you agree with the proposed emissions standards for biomass boilers below 20MW? If not, why, and do you have any evidence supporting different</p>

ones, in particular on how they safeguard air quality?

Yes/No

Comments:

Q10: Do you think the RHI should be structured to encourage energy efficiency through the tariff structure (in particular the use of deeming), or, additionally, require householders to install minimum energy efficiency standards as a condition for benefiting from RHI support?

Yes/No

Comments:

Q11: Can you provide suggestions for how to ensure that developers do not build to lower energy efficiency standards as a result of the RHI in advance of 2013 and 2016 building regulations taking effect?

Comments:

CHAPTER 3: TARIFFS

Q12: Do you agree with our proposals on where we should meter and where we should deem to determine an installation's entitlement to RHI compensation?

Yes

Comments:

The Authority is content with the proposed metering and deeming approach.

Q13: Do you agree that a process based on SAP or SBEM for existing buildings or the Energy Performance Certificate for new buildings is the best way of implementing deeming? Do you have any suggestions on the details of how this assessment process should work?

Yes/No

Comments:

Q14: Do you agree that at the large scale/in process heating, where we propose metering, the risk of metering resulting in a perverse incentive to overgenerate is low? How could we reduce it further within the constraints of using metering, to ensure only useful heat is compensated? Do you see any practical difficulties

concerning use of heat meters (such as on availability, reliability or cost of heat meters) and, if so, how should we address them?

Yes

Comments:

The Authority believes that the risk of metering resulting in a perverse incentive to overgenerate is low and welcomes this approach for large scale and process- heating installations.

Q15: What is the right incentive level required to bring forward renewable heat from large-scale biomass including in the form of CHP while minimising costs to consumers?

Comments:

Q16: What is the right incentive level required to bring forward renewable heat from biogas combustion above 200 kW including in the form of CHP while minimising costs to consumers? Do you have any data or evidence supporting your view?

Comments:

Q17: Do you have any data or evidence on the costs of air source heat pumps above 350 kW or solar thermal above 100 kW?

Comments:

Q18: Do you agree with the proposed approach to setting the RHI tariffs, including tariff structure and rates of return? Do you agree with the resulting tariff levels and lifetimes? If not, what alternatives would you prefer, and on the basis of what evidence?

Yes

Comments:

The Authority is content with the tariff setting approach and the rates of returns that have been used to set the tariffs.

However, the Authority is concerned about some of the tariffs and the ranges proposed. As an example there is a 56% difference between the tariff range of 1.6p to 2.5p for Solid Biomass CHP and proposes that the higher tariff of 2.5p is used.

The Authority is also concerned about the length of the tariff and suggests that an approach is taken where the tariff lasts over the length of the project.

As an example, a Waste Private Finance Initiative Scheme is designed to operate over a period of 25 years. In this instance, this requirement should be recognised and the RHI should be paid over the 25 year period.

Q19: Do you agree with our proposed approach on mixed fuels? Do you agree with our proposal that, at larger sites, with the exception of EfW, RHI will require the use of a dedicated boiler for the renewable fuel? Where our approach is to follow the Renewables Obligation, do any aspects need to be adapted to account for the different situation of renewable heat?

Yes

Comments:

The Authority agrees with the approach to allow mixed waste to be combusted in a single boiler.

Q20: Do you believe that we should provide an uplift for renewable district heating?

Yes

Comments:

The Authority is glad that the RHI recognises that district heating can be a useful and cost effective alternative to installing individual heating systems in individual properties.

The Authority is very supportive of the uplift for renewable district heating and believes that as long as the uplift is designed to cover the additional costs of installing a district heating network and associated infrastructure, this will greatly aid the installation of district heating systems.

Q21: Do you believe that an uplift should be available to all eligible district heating networks, or that eligibility should be determined on a case-by-case basis depending on whether a network contributes to the objective of connecting hard-to-heat properties (and, if the latter, how should we determine this for each case)? Do you agree that situations of one or a small number of large external heat users should not be eligible for an uplift, and, if so, what should be the minimum eligibility requirement for an uplift (expressed for instance as a minimum number of external customers)?

Yes

Comments:

The Authority welcomes an uplift for all eligible district heating networks and believes that this should be determined on a case by case basis, however, it should not just depend on hard to treat properties, as the financial barriers with district heating networks lie around the cost of installing the network and associated infrastructure and not just on the type of property at which the installation will take place.

CHAPTER 4: THE RHI BEYOND 2011

Q22: Do you agree that RHI tariffs should be fully fixed (other than to correct for inflation) for the duration of any project's entitlement to RHI support? Do you agree that we should include bio-energy tariffs, including the fuel part of those tariffs, in such a grandfathering commitment?

Comments:

Q23: Do you agree with our proposal not to introduce degression from the outset of the scheme but consider the case at the first review?

Yes/No

Comments:

Q24: Do you agree with our proposed approach on innovative and emerging technologies?

Yes/No

Comments:

Q25: Do you have any views on how we should encourage technology cost reductions through the RHI, particularly on solar thermal heat?

Comments:

Q26: Do you agree with our proposed approach to reviews, and the timing and scope of the initial review?

Yes/No

Comments:

Q27: Can you provide examples of situations that could be taken into consideration in determining criteria for an emergency review?

Comments:

CHAPTER 5: INTERACTION WITH OTHER POLICIES

Q28: Do you agree with our proposed approach to allow access to RHI support to new projects where installation completed after 15 July 2009, but not before? Do you have any evidence showing that in particular situations RHI support for installations existing before this date would be needed and justifiable?

Comments:

CHAPTER 6: ADMINISTRATION

Q29: Are there any parts of the proposals set out in this consultation that in your view would allow for unacceptable abuse of RHI support, or other unintended consequences? If so, how could we tighten the rules while keeping the scheme workable, and avoiding an overly high administrative burden?

Yes/No

Comments:

ANNEX 3: CALL FOR EVIDENCE ON DISTRICT HEATING NETWORKS

Q30: Do you agree with our proposed overall approach to setting the level of the uplift? Can you provide evidence that would help us to determine the level of uplift? In particular:

Can you describe typical district heating networks that would be appropriate as reference networks, and what are their network costs, heat loads, and customer numbers and characteristics?

What proportion of the heat load of such networks is typically supplied to hard-to-treat properties? What proportion of the total network of the reference installation(s) supply heat to hard to treat properties?

Should we choose one reference network and determine one uplift (in p/kWh) applicable to all sizes of networks, or should there be several based on a number of differently sized reference networks?

Yes/No

Comments:

(v) NLWA response to the Mayor of London – Draft Climate Change Adaptation Strategy – Public consultation draft

London Climate Change Adaptation
Post Point 19
Freepost LON15799
City Hall
The Queen's Walk
London SE1 2BR

6th May 2010

Dear Sir/Madam,

**Ref: The draft climate change adaptation strategy for London –
Public Consultation Draft, Mayor of London, February 2010**

Thank you for providing us with the opportunity to respond to the consultation on the above. However, due to the timing of the consultation in relation to local and national elections, this has to be an officer response that will remain subject to approval by Members at the June meeting of the North London Waste Authority.

The Authority is one of the six joint waste disposal authorities in England and four in London, and has nearly 1m tonnes of municipal solid waste arising within its seven constituent borough councils (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest). The Authority arranges all municipal waste disposal and most recycling and composting for its area.

The Authority and its seven constituent borough councils have agreed a joint municipal waste management strategy for the area, which includes an objective to achieve a shared recycling target of 50% by 2020. In line with national waste strategy objectives, the North London Joint Waste Strategy also includes an objective to achieve a significant reduction in waste sent to landfill with a target to reduce biodegradable municipal waste to landfill to 35% of 1995 levels by 2020.

In addition to the above, the Authority has embarked upon a procurement process to secure new waste facilities and services to manage North London's waste in the future as existing facilities become life-expired. With a recent award of £258.4 million in PFI credits, the Authority's 'reference project' includes the construction of a range of new waste facilities and the production of solid recovered fuel that can be used in place of fossil fuels for energy and potentially heat production.

Climate change mitigation and adaptation are important considerations for the Authority and its constituent borough councils going forward and there is a recognised need for the Authority and its future contractors to take account of the consequences of unavoidable climate change in London in the design and build of future facilities and services. Consequently the timing of both this consultation and the consultation on the Mayor's Draft Climate Change Mitigation and Energy Strategy are important for the Authority and its partners in meeting the challenge of climate change.

Finally, the Authority has already made a commitment to help address climate change by officially signing the 'Nottingham Declaration', which means that the Authority has pledged to tackle climate change in its area and help the UK deliver its national climate change targets. In signing the declaration, the Authority has agreed to develop plans with partners and local communities over the forthcoming years to address the causes and impacts of climate change which include extreme weather conditions and flooding.

The Authority's response to the Draft Climate Change Adaptation Strategy for London is relatively brief and focussed upon the issues which have most relevance to us. However, if you require clarification on any of the points raised, please do not hesitate to contact me.

Yours faithfully,

Andrew Lappage
Head of Waste Strategy & Contracts

Response from the North London Waste Authority to the draft climate change adaptation strategy for London, Public Consultation Draft, February 2010

Question 1 - Have we correctly identified the climate change risks to London?

- 1.1 Table 1.1 in Chapter one of *The draft climate change adaptation strategy for London* summarises the changes to key atmospheric variables for the middle of the 21st century under a medium emissions scenario as rising temperatures, more seasonal rainfall, tidal surges and sea level rise. However, the detail of Chapter 1 goes on to describe the four main risks to London from climate change as being: windstorms, flooding, drought and heatwaves. The further detailed discussion of understanding and managing the impacts of each change as outlined in Part II of the strategy, chapters 3, 4 and 5 only includes respectively, flooding, drought and overheating. Windstorms are excluded from the detailed discussion in these further chapters.
- 1.2 The rationale for excluding windstorms from the detailed discussion is that:
“Due to the uncertainty in the projections of windstorms in UKCP09, and the fact that southeast England has the highest building standards for wind resistance in England, this draft of the strategy does not consider in depth the impacts of windstorms.” It is also noted that the climate models cannot currently predict intense local windstorms, such as the tornado that affected north London in December 2006.
- 1.3 The Authority comments that ‘yes’ the climate change risks to London have been correctly identified in Part I of *The draft climate change adaptation strategy for London*. However, the Authority is concerned that the exclusion of windstorms from any further detailed discussion in the strategy could result in this impact being forgotten. The Authority would recommend that there should be a section or brief chapter on windstorms within Part II of the strategy which includes the detailed discussion of each risk. Whilst it may not be possible to include the same level of detail in terms of actions to adapt to the risk of windstorms as for the other three risks, the inclusion of a chapter on this issue would at the least ensure that this important risk is not forgotten.

Question 2 – Does the draft strategy provide a framework for identifying and prioritising the key climate risks to London and prioritising the key actions? If not, how can it be improved?

- 2.1 Yes, *The draft climate change adaptation strategy for London* does provide a framework for identifying and prioritising the key climate change risks to London, but the Authority would argue that it either needs an accompanying 'implementation action' summary document or alternatively that the Executive Summary is renamed so that the summary of the risks and the list of key actions included to respond to each risk is given more prominence within the document. The table in Part IV which gives details of each action in the strategy, would be more useful if it also listed each risk too and then listed the supporting actions beneath each. This would enable readers to more clearly see which risks have been identified and the actions proposed as a result.
- 2.2 In terms of the prioritisation of the risks, the Executive Summary of the draft strategy helpfully identifies each risk in terms of whether there is a Low, Medium or High probability or likelihood of the risk occurring. It then identifies whether the level of risk is increasing or not and then whether the level of vulnerability to the risk is high, medium or low. Therefore in the Executive Summary, each risk is assessed in terms of:
- Likelihood or probability of the risk occurring
 - Likely change in the level of risk
 - London's vulnerability to the risk
- Each risk is then given an overall 'summary assessment' on the basis of the above.
- 2.3 This assessment of each risk is very helpful, but it is not included elsewhere in the document.
- 2.4 It is recommended that the assessments of each risk which are included in the Executive Summary of *The draft climate change adaptation strategy for London* are repeated at the start of Chapters 3, 4 and 5 which discuss each risk in more detail as these assessments provide useful context for each risk and therefore associated action prioritisation.
- 2.5 In relation to action prioritisation, whilst the draft strategy provides a helpful framework for identifying key actions, the actions are not very clearly prioritised. Additionally, because climate change adaptation requires a multi-stakeholder response, the majority of actions also require implementation by a range of stakeholders which makes prioritisation more difficult.
- 2.6 It is recommended that if each risk is given a summary assessment as outlined above in paragraph 2.2, then the actions for responding to each risk would be given some more context. For additional clarity, it would also be helpful if each action listed in the summary table in Part IV (pages 120 -123) was also given an overall prioritisation rating or if not an actual score, then a colour coding or range to indicate its priority relative to other actions in the strategy. Some of the actions are also more SMART (Specific, Measurable, Achievable, Realistic and Time bound) than others, so it would also be helpful to identify those actions

which are ongoing and possibly more reactive compared to other SMARTer actions. For example to address overheating, the strategy includes two actions which are very SMART:

Action 19: The Mayor will work with partners to increase tree cover across London by 5 percent (from 20 to 25 percent) by 2025.

Action 20: The Mayor will work with partners to enable the delivery of 100,000 m² of new green roofs by 2012 (from 2008/09 baseline).

Whilst the partners are not identified for each action in Chapter 5 (the partners are listed in the table in Part IV) the overall aim of each action however and the measures of success are clear.

- 2.9 The two actions above compare with action 12 for example to address drought:

Action 12: The Mayor will lobby the water utility regulator, OfWat, to encourage and enable the water companies to deliver greater household water efficiency savings and greater investment in London's water infrastructure.

This is much more reactive action, with no 'delivered by' date included for this action in the table in Part IV of the strategy. However, it is an action which is nevertheless important.

- 2.10 It is therefore recommended that the final strategy gives some more clarity regarding the prioritisation of tasks to ensure that stakeholders understand the priorities, and also to ensure that those actions which are less SMART or which involve a greater number of stakeholders or which address cross-cutting issues and are therefore more complicated, as outlined in Part III of the strategy, are not forgotten.

Question 3 – Do you agree that the proposed actions are the right ones? What alternatives and additions do you suggest and how can you or your organisation help implement them?

- 3.1 The Authority does not have the necessary expertise to comment upon all of the actions included within the strategy, but has highlighted those that are likely to affect the Authority and particularly its plans for building new waste facilities in London over the next few years and for providing waste and resource recovery services into the future.

- 3.2 In relation to the waste services delivered by the Authority, the Authority considers that it can support a number of the actions contained within the strategy including:

Action 12, to reduce our demand for water; by specifying new waste facilities with water conservation in mind.

Action 20, to enable the delivery of 100,000 m² of new green roofs; by potentially including this requirement in specifications for new facilities, if appropriate.

Action 21, to publish bespoke design guidance for developers to reduce overheating risk; by making this guidance available to developers of waste facilities in the Authority's area.

Action 34, to work with the Distribution Network Operator and the energy retailers to ensure that the distribution infrastructure is resilient to climate impacts and that energy suppliers can meet seasonal variations in demand; by taking this requirement into account in the specification for the Authority's fuel use contract.

- 3.3 The Authority is not suggesting alternative or additional actions to the strategy, because there are others more qualified and knowledgeable to do so. However, the Authority recommends that there should be a supporting communication plan for the strategy to ensure that all stakeholders who can contribute to implementing the plan have an understanding of its objectives and their role in achieving them.
- 3.4 The Authority has already commented above that it would be helpful if the actions were more clearly prioritised as this would assist stakeholders in developing and implementing their own plans. However, it would also be helpful if a summary document could be published, perhaps including some case studies of organisations who are contributing to the climate change adaptation strategy to show others how they can play their part and what is expected of them.

Question 4 – How can we measure how well London is adapting to climate change? What do you think are the key indicators and who should measure them?

- 4.1 The actions contained within *The draft climate change adaptation strategy for London* are wide ranging, e.g. ranging from actions such as Action 30 to restore 15km of London's rivers by 2015, to actions such as Action 25 to assess and promote 'Cool Roofs' technologies.
- 4.2 A measurement framework for the strategy should ideally be included from the outset, together with a commitment to the production of an annual (or other appropriately timed) monitoring report, to assess progress.
- 4.3 Progress measurement will be required by a wide range of stakeholders, but the Authority considers that the GLA should produce the progress reports.
- 4.4 In North London for example, where the Authority and its seven borough partners have approved a joint strategy, the Authority takes the responsibility for drafting the annual monitoring report, although each partner reviews the draft of this report before it is submitted for

final approval by Authority members. However, measuring progress against each indicator is a shared responsibility. Each borough and the Authority supplies data, with the majority recorded on the national waste reporting system 'WasteDataFlow', but the Authority collates this data and uses it for progress reporting.

- 4.5 It is recommended that a similar approach is adopted by the Mayor of London, with the Mayor of London/GLA taking the lead for producing annual or strategy end impact reports, but with all stakeholders providing the necessary data for the same. Potentially if stakeholders were able to formally 'sign up' to support the *The climate change adaptation strategy for London* it might be possible to require them to supply some data as part of their commitment to the strategy. However, any such commitment should not be too onerous. Ideally, the indicators used to assess progress on strategy implementation should already be available and reported upon, as in the case of the WasteDataFlow information used by the Authority and its partners to monitor joint waste strategy implementation and progress.

(vi) NLWA response to Defra – Consultation on implementing the Packaging Strategy: Recovery and Recycling Targets, funding transparency and technical changes

Robert Rawlings
Producer Responsibility Unit
Defra
Area 6D Ergon House
Horseferry Road
London SW1P 2AL

08 June 2010

Dear Sir,

Ref: Implementing the Packaging Strategy

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority is one of the six joint waste disposal authorities in England, with nearly 1 million tonnes of municipal solid waste arising in its area each year.

In February 2009 the Authority and its seven constituent borough councils (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) adopted a joint municipal waste management strategy for the area which includes a target of 50% recycling, composting and reuse by 2020 and we already have in place a short term waste prevention implementation plan.

In our response which is attached we have focused upon aspects which have particular relevance to the Authority.

Thank you once again for the opportunity to respond to this consultation and if you require clarification on any of the points raised, please do not hesitate to contact me.

Yours faithfully

Andrew Lappage
Head of Waste Strategy and Contracts

Questions 1 and 2

The projections that are used for waste arising and obligated tonnage seem to be reasonable and are based upon an informed view of the market. It is considered unlikely that other projections would have a greater chance of accurately predicting future growth.

Questions 3, 4, 5, 6, 7 and 8

The proposed targets and the analysis of what they are likely to require seem to be reasonable and are based upon an informed view of the market. It is unlikely that other projections would have a greater chance of accurately predicting future growth.

The proposed targets appear reasonable and sufficient to drive forwards packaging material recovery.

Question 9

The Authority supports the proposed targets. The increased levels of packaging recovery that are proposed will reduce the emission of greenhouse gasses and the impact of climate change and would be expected to lead to an increase in investment in reprocessing technologies, further stimulating the recovery of packaging from the waste stream.

The Authority would be particularly keen to see mechanism by which the value of the tradable packaging recycling notes generated by reprocessors can be used to offset the additional costs to local authorities of collecting and separating various recyclable packaging wastes.

Question 10

Over the period showing the obligated tonnage gap the Authority has seen an expected increase in the amount of all materials collected for recycling. No tonnage gap for packaging materials has been noticed and so the Authority cannot comment on the reasons for the obligated tonnage gap.

The Authority suggests the container glass manufacture and supply chain should be given greatest emphasis, but could speculate as to whether the gap is a result of “light-weighting” and a shift to plastic containers where the material specific target is lower.

The Authority does not have any proposals to reduce this gap.

Question 11

The Authority supports the policy of encouraging more glass to be recycled into containers rather than as an aggregate substitute but would urge the government to manage the implementation of the policy with care to ensure that sufficient market capacity remains or is developed in time, bearing in mind the imbalance between filling demand and waste arising in the country in relation to the different colours of glass. In order to prevent this occurrence, Government could consider allowing the market to determine the demand for the various applications of recycled glass but only allow glass sent for packaging to be counted towards recycling targets and glass sent for aggregates to be counted towards recovery targets. This would encourage more glass to be recycled into packaging but still allow an outlet other than landfill for the remainder.

In order to incentivise the recycling of glass into aggregate the government might consider only allowing a PRN to be claimed for aggregate up to the maximum level set but allow unlimited claims for recycling into containers. This differential would incentivise the manufacture of aggregate in preference to landfill and the manufacture of containers over aggregate but would not restrict the freedom of the market.

Government would need to have regard to the existing waste collection and recovery infrastructure and techniques before implementing this policy.

Question 12

The Authority supports the principal of increasing recycling and targeting a wider range of materials. However, there is a concern that the cost and logistics of collecting and sorting some of the listed waste types, especially domestic film, may be prohibitive at this time. Government would need to have regard to the existing waste collection and reclamation infrastructure and techniques before implementing this policy, should consider whether the targets were set at a level such that additional costs might inadvertently fall to the public sector and should not set targets that cannot be achieved

Government could consider differential PRN/PERN values for certain materials to further encourage the recycling of particular elements of the waste stream. For example double PRNs could be awarded for domestic films that are collected for recycling or recovery to further encourage this activity.

If measures to encourage the recycling and recovery of domestic films are introduced there could be problems with contamination by compostable films that may contaminate other domestic films sent for recycling.

Government should engage closely with the recycling industry to ensure that any measures that are introduced can be complied with.

Questions 13 – 18

The Authority has no comment.

Question 19

Packaging sent to offshore oil platforms from the United Kingdom should form part of the obligation and should be returned to the United Kingdom for recovery. It is inequitable that the cost of recovering and recycling this waste is borne by other parts of the packaging chain. The government is correct to seek to rectify this situation.

As a general comment the government should encourage good design of products that allows packaging to be recycled or recovered more readily after use. Designers of packaging should be encouraged to consider how it could be recycled or recovered after use.

vii) NLWA consultation response to Defra – Meeting the EU Landfill Diversion Targets

Mark Millet
Department for Environment, Food and Rural Affairs
Area 6C Ergon House
Horseferry Road
London SW1P 2AL

9 June 2010

Dear Sir,

Ref: Consultation on meeting EU landfill diversion targets

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority is one of the six joint waste disposal authorities in England with nearly 1m tonnes of municipal solid waste arising in its area each year.

In February 2009 the Authority and its seven constituent borough councils (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) adopted a joint municipal waste management strategy for the area which includes a target of 50% recycling, composting and reuse by 2020.

Additionally, the Authority has recently launched a major procurement programme and is seeking proposals for services and investment in new waste management infrastructure to treat the waste collected by the constituent councils until at least 2030.

In our response which is attached we have focused upon aspects which have particular relevance to the Authority.

Thank you once again for the opportunity to respond to this consultation and if you require clarification on any of the points raised, please do not hesitate to contact me.

Yours faithfully

Andrew Lappage
Head of Waste Strategy & Contracts

North London Waste Authority Response

Questions 1 and 2

The Authority favours the continued use of the WasteDataFlow system to measure the amounts of waste sent to landfill by local authorities. The amount of waste sent to landfill by other sources should then be calculated by deducting the amount sent by local authorities from the total in the return by landfill operators. The biodegradable content of the total waste stream should then be surveyed by DEFRA/EA at the point of delivery to landfill and this amount applied to the total to calculate the biodegradable content.

When surveying the biodegradable content of the waste stream it should be borne in mind that different fractions of waste are likely to contain different amounts of biodegradable waste. A sophisticated sampling strategy will be required in order to obtain an accurate assessment of the whole waste stream.

This approach is favoured as it would require no change to the administrative burden on waste producers, local authorities, waste collection contractors or landfill site operators. The WasteDataFlow system is already established in use by local authorities for their own calculations and to not use it to measure LATS compliance may lead to further problems when attempting to reconcile the two different calculations, subject to our response at Question 4 below.

If there is an opportunity to review and simplify WasteDataFlow however, this would be much appreciated.

Question 3

The current guidance on classifying waste by the list of wastes is sufficient; however compliance with the code may not be as strict within the industry as might be hoped for and this could create a problem.

Generic waste codes such as 20 03 01 (Mixed municipal wastes) and 20 03 99 (municipal wastes not otherwise specified) can be used as a “safe” way to describe wastes sent to landfill. In the waste industry it is very common for a waste collection contractor to raise a waste transfer note on behalf of a waste producer who is not a waste management professional and in this situation it is safer for the carrier to describe the waste with a more generic code than risk collecting items of waste that are outside of the stated description. The use of a broad description reduces the risk of failing to properly describe the waste when compared to a more defined description such as 20 01 02 (glass) or 20 01 11 (textiles) where the waste is highly specified, and therefore also reduces the risk of being prosecuted for a breach of the duty of care.

DEFRA and the Environment Agency should face these challenges head-on however, as requiring the use of more specific waste codes wherever possible

will drive the improved management of those wastes as the opportunity to reap the financial benefits of recycling will be more evident to all concerned; and from a national perspective, a load of glass if landfilled will not be measured as biodegradable, and a load of textiles once separated is far more likely to be diverted from landfill for reuse or recycling along with its 50% biodegradable content.

Question 4

Over the period during which the LATS system has operated the amounts of waste sent to landfill by local authorities has fallen considerably. This change was initially driven by the LATS system and the potential fines that local authorities could face but has now been driven for some years by the landfill tax escalator and no longer by any incentive provided by the LATS system.

Also, waste disposal authorities are obliged to transfer a reasonable share of their LATS costs/risks onto their non-household waste charges to their waste collection authorities (rather than have all LATS costs for municipal waste borne by council tax payers), hindering the ability of waste collection authorities to offer reasonably priced trade waste services relative to private contractors, even though it may be better for the management of the street-scene for the waste collection authority to provide the service. Nationally, this may be part of the reason for recent reductions in municipal waste.

When looking at financial drivers for waste disposal authorities, the income and expenditure derived from compliance with the LATS targets is small in comparison to the costs and savings derived from the landfill tax system which applies to all waste sent to landfill regardless of source. The landfill tax is a much greater driver for change than the LATS system.

The value of LATS, being a market-driven variable in an immature market with very imperfect knowledge, cannot be relied upon in any financial model, so no business case can ever be approved that is reliant on LATS income. Even the risk of LATS fines has not been a driver in practice as allowances are trading at under 50p. Finally, DEFRA's own WIDP team that oversees applications for £multi-m PFI awards does not allow the inclusion of any LATS income in a business case. Consequently it is difficult, if not impossible, to argue that LATS are driving investment in new infrastructure; only landfill tax avoidance is truly 'bankable' in this regard.

Since DEFRA does not intend to extend the LATS system to include wastes collected by private waste contractors, and given the weaknesses set out above, the system should be discontinued forthwith to ensure a level playing field for all parties and to remove the administrative burden on local authorities.

Question 5

It is not possible to answer this question due to the uncertainties over the details of the suggested steps. Further details of each of these proposals are needed in order that a meaningful answer can be prepared. Consequently DEFRA should only rely on responses to such a future consultation.

Question 6

Other policy options should be considered in the context of full details of the proposed steps listed in question 5 above.

Question 7 and 8

The proposal to create the concept of "Collected Waste" to distinguish this waste stream from other types of municipal waste is appropriate and necessary in order to comply with the Landfill Directive definition of municipal waste that was transposed directly into UK law. However, "Collected Waste" is not a suitable name for waste collected by local authorities as many different types of waste are collected. Another name that better reflects the nature of the waste stream being described should be adopted. Suggestions include "Private Municipal Waste" and "Council Municipal Waste" to distinguish firstly the two components of the new "municipal waste" stream, and secondly to allow recognition of the existence of wastes in both the private and council sectors that are not "municipal".

Question 9 and 10

As described in the answer to Question 4, the LATS system should be discontinued forthwith.

(viii) NLWA response to Defra – Consultation on the introduction of restrictions on the landfilling of certain wastes

Landfill Restrictions Consultation
Waste Permitting Unit
Defra
Area 6D Ergon House
Horseferry Road
London SW1P 2AL

9 June 2010

Dear Sir or Madam,

Ref: Response from the North London Waste Authority to the Consultation on the introduction of restrictions on the landfilling of certain wastes, Defra and the Welsh Assembly Government, March 2010

Thank you for providing us with the opportunity to respond to the consultation on the possible introduction of restrictions on landfilling certain wastes. I am pleased to provide comments from the North London Waste Authority (NLWA).

The NLWA is one of the six statutory joint waste disposal authorities in England and one of the four in London. We handle nearly 1m tonnes of municipal solid waste collected by our seven constituent borough councils namely, Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

Collectively the eight partners, the NLWA and the seven constituent boroughs, have agreed a joint waste strategy, which sets the framework for a reduction in waste being sent to landfill and a combined recycling and composting target of 50% by 2020.

In addition, the Authority has recently embarked upon a long term procurement process to secure services and facilities to deliver our goals in the medium to long term and has recently been awarded a record breaking £258.4 million in PFI credits to assist with the resultant investment required.

The Authority is responding to this consultation having already had dialogue with our constituent borough councils, but you will receive separate responses from them in their independent capacities as waste collection authorities in particular.

The implications of introducing restrictions on landfilling certain wastes would affect both tiers of local government, however, so where possible, whilst we are a waste disposal authority, we have drawn out what we suggest might be the potential implications for municipal waste collection too and commented accordingly.

Finally, in addition, the Authority has recently responded to the *Consultation on implementing the packaging strategy: recovery and recycling targets, funding transparency and technical changes*, Defra, Scottish Government and Welsh Assembly Government (4th March 2010) and the *Consultation on meeting EU landfill diversion targets*, Defra (18th March 2010) so our response to this consultation is written within the context of those other two responses. Accordingly, and where appropriate we have referenced the Authority's responses to these other consultations.

If you require any further clarification of the issues raised in our response or have additional queries, then please do not hesitate to contact me.

Yours faithfully

Andrew Lappage
Head of Waste Strategy and Contracts

Response from the North London Waste Authority to the Consultation on the introduction of restrictions on the landfilling of certain wastes

General comments

- 1.1 The Authority is responding, as noted in our accompanying letter to this consultation within the context of already having drafted responses to the *Consultation on implementing the packaging strategy: recovery and recycling targets, funding transparency and technical changes*, Defra, Scottish Government and Welsh Assembly Government (4th March 2010) and to the *Consultation on meeting EU landfill diversion targets*, Defra (18th March 2010) and therefore cross references these additional consultation responses where appropriate.
- 1.2 The Authority is pleased to see that this is a two-stage consultation process and should the responses to this first stage consultation suggest a move towards restricting landfilling of certain wastes, then that a second, more detailed consultation document will be issued. The Authority would be keen to respond to any further consultations or dialogue on this matter.
- 1.3 However, at this stage the NLWA would also like to make some general comments and observations about proposals to introduce restrictions on landfilling certain wastes before responding as requested to the consultation questions for each of the candidate waste types listed in Chapter 6 of the consultation document. These general comments are as follows:
- 1.4 The Authority supports the principle outlined in paragraph 3.2 of the consultation document that landfill should be the 'home of last resort' for most wastes and this principle has been enshrined in the North London Joint Waste Strategy through the following objective and implementation action:

Objective:

"To reduce greenhouse gases by disposing of less organic waste in landfill sites."

Implementation Action 4.N

"The Partner Authorities will seek to minimise disposal to landfill throughout the period of this Strategy and undertake to seek the recovery of energy from landfill gas wherever practicable"

- 1.5 The Authority also supports the principle to move to reduce biodegradable waste to landfill on the basis of:
- the reduction in landfill gas resulting;
 - the contribution that the introduction of any landfill restrictions can make towards achieving overall carbon reduction targets and the implications of this;
 - and the positive impact as far as climate change is concerned.
- 1.6 However, we would comment that if any restrictions on landfilling certain wastes are introduced, with or without an additional requirement to sort, this will require additional waste management infrastructure, which aside from the requirement for funding will need to overcome the challenges of securing appropriate consents through the planning and permitting systems. Therefore the introduction of any such restrictions should take account of, for example, recently proposed changes to the planning framework (The Coalition: our programme for government, HM Government, May 2008) and will need to be sequential to existing policies and instruments. Accordingly dates should be set sufficiently far ahead (7 to 10 years) to allow for planned implementation and associated communication programmes before, during and after actual implementation.
- 1.7 In addition, the impact upon recycling markets of any possible policy changes to further restrict waste to landfill is difficult to predict, but there could be a risk that producing greater volumes of recyclates for which there is a limited market would reduce the prices paid for the material by reprocessors which would either directly affect the income received from the sale of recyclates for authorities such as ourselves, or increase the gate fee that both public authorities and private sector waste producers have to pay at materials recovery facilities. The government may therefore need to fund additional market development programmes to create alternative recycling routes through such organisations as London Remade at a regional level and WRAP nationally.
- 1.8 Finally, in relation to the consultation document itself, the Authority has found it somewhat difficult to assess the benefits of a landfill ban compared to a landfill ban with a requirement to sort because the consultation document gives little detail about proposals for requirements to sort. Further information would be helpful in order to assess the implications of introducing such a requirement either in addition to landfill bans or in place of them. We are also unclear how requirements to sort would differ from the current 'pre-treatment' requirements introduced in response to the Landfill Directive. Local authorities are already deemed to meet these requirements by virtue of providing some form of sorting via the kerbside and MRFs, bring recycling banks and household waste recycling centres. However, if an additional 'sorting' requirement is to be introduced we are unclear how this would potentially affect local authorities and are concerned about any additional costs resulting.

- 1.9 Additionally, the terms 'ban' and 'restriction' are used in the consultation document. It is unclear whether a *de-minimus* level would be applied to a ban, so that loads containing a small percentage of a banned waste would still be allowed to be landfilled and hence the use of the term 'restriction'. However without clarification on this matter we are unsure of the implications of the use of the different terms as both have different meanings and potentially different impacts on local authorities. Some clarification of terminology would therefore be helpful in any future stage of this consultation.

Consultation questions for introduction of restrictions on landfilling of certain wastes.

- 1.10 In assessing the case for each policy option included in the consultation, namely:
- Do nothing
 - Introduce landfill bans either a) on their own or b) accompanied by a requirement to sort
 - Introduce a sorting or tougher pre-treatment requirement but without a landfill ban
 - Introduce producer responsibility systems linked to recycling targets (this could also be done as an accompaniment to a landfill ban)
- the Authority has taken the following factors into account when considering the most appropriate option for each waste type:
1. The biodegradability of the waste and the proportion of the municipal and commercial and industrial waste stream that it represents – and therefore its contribution to the production of landfill gas within a landfill site when sent to landfill. (If the LATS regime ceases as a result of the *Consultation on meeting EU landfill diversion targets*, the overall percentage of the waste stream and the biodegradability of each waste type will be important in tackling the reduction in landfill gas production and CO₂ impacts).
 2. The level of development of alternative methods of recycling or treating the waste type, i.e. options available if the waste type was banned from landfill.
 3. The evidence from other countries as outlined in the Green Alliance research quoted in the consultation document, i.e. the number of case studies in which the waste type was banned.
 4. The net benefit in £ of a ban on its own and when accompanied by a requirement to sort, as identified through the Eunomia research quoted in the consultation document.
 5. The carbon benefit of recycling or processing the waste type compared to landfill.
 6. The ease with which it might be sorted.
 7. Whether producer responsibility legislation is already in place to divert the waste type from landfill and if the producer responsibility system could be extended if not already covering this waste type.
 8. Our perception as to the impact that landfill tax is already and might have in the future, on that waste type, relative to its carbon impact,

i.e. how far the current tonnage based taxation system is working with or against the relative carbon impacts of each waste type.

- 1.9 The Authority has also assumed that the focus of any policy change is to divert biodegradable waste from landfill, rather than to increase recycling or minimisation of a particular waste stream. Accordingly the Authority has not considered whether the introduction of minimum recycled content legislation might be a more suitable policy instrument for some material streams, as this primarily works to increase recycling tonnages, rather than to restrict landfilling. The Authority has therefore assumed that any measures regarding recycling standards such as minimum content requirements would be introduced subsequent to any restrictions on landfilling or producer responsibility legislation and targets and would only be introduced if necessary. However, it would be helpful if this could be clarified in any later consultation stages.

2. NLWA Responses to the Consultation Questions

2.1 *Question 1. Given the evidence available, do you think there is a case for a landfill ban on this waste type?*

- 2.1.1 The research presented in the consultation document indicates a net £ benefit for banning all the candidate materials from landfill, with the exception of plastics, albeit that there would be considerable environmental benefits resulting from banning plastic from landfill. However, the consultation document does not set out the case for alternatives to a ban and the benefits that might result from alternative approaches. Neither does the consultation document present the additional costs that have been used in the modelling work for either the public or private sector to collect additional quantities of banned materials. Accordingly the Authority has used its own judgement on the net costs and benefits of different approaches.
- 2.1.2 Taking each of the candidate materials in turn the Authority considers the best solution for diverting each material from landfill to be as outlined in Table 1 below.

Table 1.

NLWA Preferred Option for Each Candidate Material

Material	Net benefit to society 2009 – 2024 in £ million of introducing a ban (as outlined in the consultation document)	CO₂e savings in kg /tonne by diverting the material from landfill (as outlined in the consultation document)	Authority preferred approach to divert more of the material from landfill	Rationale for Authority view
Paper/card	£253	1,574 kg/tonne for recovery 1,789 kg/tonne for recycling	Producer responsibility system extended to cover newspaper and magazines and direct mail	Already an embedded producer responsibility system in place for packaging paper and card and proposals in place to increase the targets for the same. Voluntary agreements in place for newspaper and magazines (minimum recycled content) and direct mail. It would therefore be most rational to extend the producer responsibility scheme to newspapers and magazines and direct mail to tackle other elements of the paper and cardboard stream rather than introducing a ban on landfilling these materials.
Wood	£105	1,340 kg/tonne	Rely on landfill tax escalator to increase	Extracting wood, particularly from the municipal waste stream is complex because it is often contained within furniture and/or of differing quality – MDF, soft wood and

			diversion	<p>painted or coated for example. Whilst the benefits of diverting this stream from landfill are significant a ban would potentially add substantial dismantling and sorting cost to municipal budgets in order to assist recycling for example. In addition we suggest that there is a significant amount of 'historic wood' within the environment, e.g. in the form of furniture and housing fixtures and fittings, so the introduction of producer responsibility legislation would require extensive lead-in times to deal with historic wood on the market during which time the landfill tax will have risen significantly. In addition, in North London research is being undertaken into the feasibility of a woodfuel hub, to supply woodfuel for biomass boilers. The Authority therefore concludes that it will be sufficient to rely on the landfill tax, the demand for waste wood for energy production, renewable heat incentives and ROCs to divert this particular waste stream from landfill.</p>
Textiles	£94	4,870 kg/tonne	Introduce producer responsibility system (including for carpets)	<p>The carbon benefits of diverting textiles from landfill are substantial but a landfill ban would place the additional costs of such diversion, particularly for clothing textiles, on the municipal sector, when producers of textiles are responsible for producing the material.</p>
Food	£48	428 kg/tonne for composting 523 kg/tonne for	Landfill ban for commercial and industrial food	<p>It would be relatively difficult to introduce producer responsibility legislation for this waste stream throughout the food production and distribution stream, (including to householders). However, to encourage the reduction of</p>

		anaerobic digestion	waste	<p>excess food waste it is suggested that a ban on commercial and industrial food waste to landfill would be useful. We note for example that one supermarket has already embarked on the development of a Zero Food Waste to Landfill Network through which food waste will be collected at store and sent back to depots, before being sent to specialist waste to energy processors to be turned into energy. When the network is fully operational, it could generate energy equal to 30 megawatts – enough to power a town of 20,000 people.</p> <p>(Source: http://igd.biz/index.asp?id=1&fid=1&sid=5&tid=49&folid=0&cid=1058)</p> <p>A ban on commercial and industrial food waste would also tackle food waste produced at the manufacturing stage. A study carried out DHL Excel Supply Chain for WRAP (2009) showed that 27.2% of the total waste arising from the UK food and drink supply chain (not all of which is food) is wasted at the manufacturing stage, 7.6% at the retail stage and 64.7% at the household stage.</p> <p>A ban on commercial and industrial food waste to landfill would have the benefit of diverting industrial food wastes from disposal, including the quantity of food waste from small restaurants and shops, thus making food waste collections potentially more viable for these premises and potentially further stimulating the market for anaerobic digestion. However, it may also have the unintended</p>
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				consequence of encouraging retailers to sell more short life food to householders to avoid sending the food to relatively expensive AD and composting outlets; which would have to be guarded against.
Green (garden) waste	£30	751 kg/tonne	Rely on landfill tax escalator to increase diversion	Local authorities already have established systems in place for the collection of green garden waste and promote home composting where appropriate. The increasing landfill tax is a powerful driver for maintaining these systems. Accordingly the Authority does not consider that landfill bans would add significantly to either the speed of diversion or the capture of material from such alternative legislative regimes.
WEEE	£18	Not provided	Producer responsibility system already in place, no further action required	The WEEE regulations are already in place and with future developments in the existing systems, the Authority considers the current system to be robust, without the need to add additional costs by introducing additional policy instruments. To improve the performance of the current system higher recycling and recovery targets should be applied, rather than introducing new arrangements to capture this waste stream.
Metals	£12	1,325 kg/tonne for ferrous metal 9,155 kg/tonne	Packaging metal already covered by producer responsibility targets for	Although the existing producer responsibility system for packaging waste does not cover all metals, the Authority considers that with increasing packaging targets, the WEEE targets and extensive coverage of collection systems in the municipal sector in particular, that the existing policies already in place should be sufficient to

		for aluminium	packaging metal, no further action required	deliver on the government's objectives for this stream.
Glass	£7	295 kg/tonne	Packaging glass already covered by producer responsibility targets for packaging glass, no further action required	Although the existing producer responsibility system for packaging waste does not cover all glass, the Authority considers that with increasing packaging targets and extensive coverage of collection systems in the municipal sector in particular, that the existing policies already in place should be sufficient to deliver on the government's objectives for this stream.
Plastics	Net cost	1,385 kg/tonne for recycling of dense plastics	Already covered by producer responsibility targets for packaging plastic, further investigation required to assess the best options for this material	In the municipal waste stream whilst the plastics collection systems are not yet well developed for all polymers, the situation is improving as the packaging targets increase. A ban on landfilling plastics waste might be difficult to enforce given the mixed materials found with many plastics. However, in our response to the packaging consultation referenced above we have suggested that caution and further consultation is required before implementing new measures for plastics waste as there are so many different polymers with different handling, processing and marketing needs. It may well be that minimum recycled content legislation would work for best for plastics.

2.1.3 For each of the candidate materials the Authority's rationale for the proposed policy intervention is based upon the considerations outlined in paragraph 2.1.1. However, additionally, the Authority has considered that:

- Producer responsibility legislation is in place in many cases which enshrines the polluter pays principle into the policy regime to divert additional materials from landfill in line with the EU Waste Framework Directive (2008/98/EC) (which in the updated 2008 Directive also now includes the option for Member States to introduce extended producer responsibility potentially including producer take-back and consumer information obligations).
- Producer responsibility legislation is already in place for a number of the candidate materials for a landfill ban and the UK as a whole already has experience of delivering cost effective producer responsibility regimes which are meeting the diversion targets set. It would therefore seem logical to extend this experience and good practice to other materials, rather than introducing a new suite of bans instead.
- Landfill bans will result in multiple 'owners' of the waste having material requiring collection at dispersed points of production – such as individual households requiring collection by municipal authorities. A producer compliance system introduces the potential of taking material back to the producer and therefore concentrating the waste in particular locations thereby potentially making it more economic to collect and treat.
- Everything for which there is already an economic value to recycle or recover will be driven out of landfill by increases in landfill tax. However, whilst landfill tax and bans have the potential to divert material from landfill and achieve the desired result in this regard, they do not make the 'right person' pay for the costs of doing so which producer responsibility does.

2.1.4 Therefore for the majority of the candidate materials for a landfill ban, the Authority suggests that producer responsibility can deliver more equitable results. For materials where the Authority does not believe producer responsibility is the best approach, alternatives have been suggested as in the case of food and green (garden) waste.

2.2 **Question 2. What would be the practical difficulties and issues in implementing a landfill ban on this waste type?**

2.2.1 The practical difficulties of introducing a ban vary for the different candidate waste types, but there are some general practicalities that apply to all streams:

- Firstly, as noted in paragraph 1.9 the Authority has assumed that the focus of any policy change is to divert biodegradable waste from landfill, rather than to increase recycling or minimisation of a particular waste stream. However, given the relative desirability of different alternatives to landfill, as outlined in the waste hierarchy, the government needs to ensure that sufficient alternative routes to landfill are physically available if materials are to be effectively banned from landfill disposal. In particular, an unintended consequence of introducing bans without sufficient recycling infrastructure in place could be the creation of a mandate for thermal treatment of all waste streams containing banned or restricted materials, to the detriment of solutions further up the waste hierarchy. In the case of glass for example a ban on landfill might also result in more material being recycled into aggregate rather than container glass, (the latter being more desirable from a carbon perspective). So it would be necessary to consider that additional policies may need to be introduced to affect changes such as this. e.g. the current proposals within the packaging consultation noted above which suggest a splitting of the packaging recycling targets for glass into aggregate and container recycling and placing a cap on the former (which the Authority has supported in principle, but argued against in terms of the detail).
- Secondly, despite the provision of extensive recycling systems, as noted in Table 1 for some materials, the barrier to 'complete' diversion of some municipal waste streams from landfill is not the lack of an alternative solution to landfill but public participation in the same. Therefore, a practical consideration in introducing any bans would need to be an assurance of sufficient funding reaching local authorities to encourage greater participation and capture of banned materials – be that incentives, communication or penalties.
- Thirdly some work would need to be carried out to assess the provision of alternative solutions to landfill. At present, access to alternatives to landfill and the cost of the same varies considerably from area to area, so it would be necessary to ensure that waste producers, both domestic and commercial/industrial have alternatives available to them and that if there were additional costs for local authorities of introducing new systems, then that sufficient funding was in place to enable this investment to happen.

- Fourthly, it would be necessary to recognise that a landfill ban on certain products would not necessarily have any impact on the production of short-life goods, such as 'disposable clothing'. Therefore, in practice, the introduction of a ban on landfilling some materials might also need to be accompanied by other measures to minimise production of the waste.
- Fifthly, the introduction of landfill bans would need to be given sufficient lead-in time in order to ensure that alternative treatments and solutions were developed, and sufficient communication would be necessary to signal the introduction of the bans.
- A monitoring and enforcement regime would also need to be in place to ensure that the bans were being adhered to, and if the timescales for the introduction of bans in Wales and England were different, then it would need to be recognised that waste might move from one country to another to avoid the ban, albeit that landfill tax and disposal fees would be paid.

2.3 *Question 3. If you support a ban on this type of waste what should the lead-in time be for a ban on this waste type, to allow time for the necessary infrastructure to develop?*

2.3.1 Although the Authority is generally not supportive of a ban on landfilling the target wastes, with the exception of commercial and industrial food waste, lead in times for any wastes where a ban is introduced would be dependent on the collection arrangements necessary and the technologies used to divert the particular material from landfill. The planning process for the development of alternative thermal treatment options for example can take a considerable time. The Authority considers that a 5 to 7 year lead in time would be necessary prior to the introduction of a ban on landfilling commercial and industrial food waste.

2.4 *Question 4. If you do not support a ban on this waste type, do you think other measures should be used to divert it from landfill and if so what would they be? (Please consider the alternative options listed in paragraphs 7.8 -7.17 and any other possibilities)*

2.4.1 The Authority's suggestions of alternative measures to divert the targeted waste streams from landfill are outlined in Table 1 for all materials except food waste, for which a ban is recommended.

2.5 Question 5. There may be other possible approaches to improve resource efficiency and reduce GHG emissions from this waste type (for example encouraging manufacturers and retailers to move away from using materials that are hard to recover or recycle). We would welcome observations and suggestions for each waste type.

2.5.1 In its response the Authority has not considered the use of minimum recycled content legislation which might be appropriate for some materials to act as a pull for recycling of certain materials such as paper/card and glass.

2.5.2 Another alternative would be tax breaks, such as a reduction in VAT for recycled content materials which could again act as a pull to encourage greater use of recycle and therefore stimulate the recycling market for particular materials.

2.5.3 For some 'sub-sets' of certain materials there may also be additional punitive measures which can be introduced to stimulate waste prevention or reuse. For example in relation to unwanted advertising material, often known as "junk mail". The Mailing Preference Service runs a system which many direct marketers sign up to, allowing residents to opt out of receiving addressed advertising material. Many local authorities run "no junk mail" campaigns as part of their waste prevention work; however this does not capture un-addressed material that is hand-delivered. While "no junk mail" stickers on doors may dissuade some companies from placing their advertising in letterboxes, these stickers currently do not carry any legal status and can be ignored.

2.5.4 This issue has been recognised in Victoria, Australia where the use of a sticker stating 'no junk mail' or 'no advertising material' is protected through the Environment Protection Act 1970. The Act makes it an offence for advertising material to be placed in a letterbox where such a sticker is on display, punishable by an 'on the spot' fine or a fine issued by a court.

2.5.5 It may also be useful to extend the scope of some of the existing measures to both identify and reduce GHG emissions from particular material streams. The work that is being carried out on product roadmaps to identify at which point within the production, use and disposal cycle the major GHG emissions impact is made is a helpful pre-cursor to proposing additional policy interventions.

2.5.6 In London the Mayor of London's forthcoming waste strategy is anticipated to include a GHG emissions standard which might act as a compliance test for all municipal waste management contracts that need to be submitted to the Mayor of London prior to contract notice

being published. This is another approach to ensure that GHG emissions reductions are maximised.

2.5.7 Finally, whilst the Authority has argued in the case of newspapers and magazines and direct mail for existing voluntary codes of practice to be incorporated into expanded producer responsibility legislation, the Authority recognises that voluntary codes of practice play an important role in helping the waste industry demonstrate its environmental and social responsibility. Therefore whilst voluntary codes sometimes do not capture a high number of operators due to their voluntary nature, they do have role to play and should be encouraged where statutory requirements do not exist.

2.6 ***Question 6. In addition to the above we invite comments on the costs and benefits detailed in the Consultation Stage Impact Assessment. In particular we would welcome information/views concerning three issues: (i) the likely impacts of the policy options in light of changes already occurring from existing instruments; (ii) the assumptions on the diversion rates assumed from different policy options; and (iii) the impact of the policy options on the efficiency of recycling markets – where the unit cost estimates are reasonable and where the implementation of the options would lower unit costs over time.***

2.6.1 The Authority has no further comments on the Impact Assessment and has already included comments in the above having considered the interplay of existing policy instruments such as the landfill tax and producer responsibility legislation.

(ix) NLWA response to the Mayor of London – Assembly draft of the Mayor’s Draft Municipal Waste Management Strategy – London’s Wasted Resource

Policy One: Informing Producers and Consumers of the Value of Reducing, Reusing and Recycling Municipal Waste

1. *Do you agree the Mayor can best influence waste reduction and increase awareness on the value of reuse and recycling in London by supporting local and regional waste campaigns? What else do you think the Mayor can do to make an effective impact?*

- 1.1.1 Yes. The Authority believes that the Mayor can best influence waste reduction and increase awareness on the value of reuse in London by supporting local and regional campaigns. However, the Authority makes a distinction between the focus of activities for reduction and reuse compared to recycling and the Mayor's role in this regard.
- 1.1.2 The recent Defra Evidence Review¹ suggested that it is most effective to separate campaign messages on reduction and reuse by waste stream, so for example running a campaign with a focus on food waste reduction by using the national 'Love Food Hate Waste' branding and a separate initiative focussed on reuse, targeting furniture; rather than combining all these messages under one general 'reduce and reuse' campaign approach. Material specific reduction and reuse campaigns can easily be delivered at a pan-London level maximising the benefits of GLA buying power and reach, and the opportunities that exist for the Mayor and the GLA to secure pan-London media partners who would not be interested in partnering with boroughs or disposal authorities at a more local level. The Authority would recommend that an early focus for a reduction campaign should be 'Love Food, Hate Waste', with furniture reuse potentially adopted as a later pan-London campaign, once the infrastructure is more fully in place.
- 1.1.3 The Authority also believes that the Mayor should additionally support local reduction and reuse campaigns for example as in previous Recycle for London campaigns, by providing support for local advertising or leaflets at a borough level – perhaps based upon a pan-London 'standard' layout to assist consistency of approach.
- 1.1.4 In relation to recycling, the opportunities for the Mayor to influence public behaviour are more constrained because service delivery variation across London makes service specific advertising more difficult. However, the

¹ Household Waste Prevention Evidence Review – WR1204, Defra, October 2009: Defra (2009) Evidence Review (WR 1204) Household Waste Evidence Review: Executive Report
The Final Report : [WR1204 "Household Waste Prevention Evidence Review" – Executive Report \(L1 m1\)](#) and the associated supporting reports are available at: [Defra, UK - Science Search](#) – <http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=O&ProjectID=16161>

visibility of the regional 'Starve Your Bin' campaign suggests that there are opportunities to promote recycling more generally across the capital. One of the options which would make Mayoral pan-London recycling campaigns more effective and service focussed would be if boroughs were able to make small adaptations to their existing arrangements, such as the adoption of a consistent pan-London colour scheme for specific collection activities. There would be a cost to such a move, for which financial assistance (possibly from the London Waste and Recycling Board (LWaRB)) would provide an impetus to change, but in the longer term it would assist in making communications more consistent at a local level and would maximise the uplift that would be achieved with regional support.

- 1.1.5 An additional option to maximise impact would be for the Mayor to focus attention on particular groups, such as residents in flatted properties, although again, service delivery differentials might make such an approach more problematic.
- 1.1.6. Local and regional waste awareness campaigns can undoubtedly have a major impact on raising awareness on the value of reuse and recycling. However, to achieve maximum benefit they need to be well integrated with performance indicators and monitoring systems in place. The Authority would support Mayoral efforts being focussed on pan-London evaluation work. Pre and post campaign monitoring is expensive, but a pan-London tracker survey for example, linked to tonnage information would provide both authorities and the GLA with the necessary evidence to support and direct future work.
- 1.1.7. Even though awareness raising is a valid option, waste reduction cannot occur on a significant scale without action from the manufacturing industry. The Mayor should use his influence to urge for an increasing focus on producer responsibility programmes to drive improvements in product design, to help local authorities and WRAP influence consumer behaviour and to ensure that the responsibility for waste management and prevention is shared amongst producers and local authorities. Better design and material choice plays a key role in minimising the creation of waste not just at the point of disposal, but throughout a product's lifecycle, and should therefore be something the Mayor is actively seeking and lobbying for.

2. Do you agree that a National approach to improving waste reduction and reuse is the best way forward? [Yes/no, why]

- 1.2.1 Waste reduction and reuse is a priority which requires a collaborative approach including shared responsibility among key partners. A nationally coordinated approach is important as it gives waste reduction and reuse higher priority on the waste management agenda and achieves economies of scale. However, flexibility needs to be given to authorities wishing to implement reuse and reduction projects on a local level.
- 1.2.2 Because a significant amount of the impact of waste reduction in particular, but also reuse, can be achieved through supply side rather than demand side initiatives it is also necessary in many cases for this work to be led from a national or even international level. The work that WRAP has been delivering

through the voluntary Courtauld Commitment with retailers to reduce waste is an excellent example of this approach – see: www.wrap.org.uk/courtauld_commitment/index.html

1.2.3 *The Authority's response to the consultation on the transposition of the revised Waste Framework Directive into the UK commented upon the need for a national approach as follows, with the flexibility to enable local authorities to supplement this at a local level:*

The Authority's view is that it would be better to introduce a national waste prevention programme for England rather than to introduce a requirement for local authorities to draw up their own waste prevention programmes. However, our view is that any national waste prevention programme, should be seen as a subset of the national waste strategy, not as a completely free standing document in its own right. For example in North London, we have an over-arching municipal waste management strategy for the area and a supplementary Waste Prevention Implementation Plan, which addresses how in the shorter term we will implement the waste prevention objectives contained within the longer term overarching waste management strategy for the area.

Our preference for a national waste prevention programme rather than a requirement for local authority programmes to be put in place is based upon the following:

- A national programme would allow a better integration of the supply and demand side approaches to waste prevention as it is easier for central government to tackle both supply and demand, than for local authorities to do this.
- A 'top down' approach from national government is most appropriate in the initial stages, even if at a later date, local authority programmes were a requirement. Any local authority programmes would benefit from fitting within the framework of an established national programme.
- Thirdly, local authorities, will principally only impact upon municipal waste, a small percentage of the total. It would be better for England to be addressing all types of waste within a national waste prevention programme, and this can best be approached by central, rather than local government.
- Fourthly, as there are already a number of initiatives in place at a national level which are focused on waste prevention, it would be useful to have an over-arching national programme which brings together some of the initiatives such as the Market Transformation Programme, the National Industrial Symbiosis Programme and the Sustainable Consumption and Procurement Programme. This integration could not be achieved by placing the requirement for producing waste prevention programmes at a local level alone.
- Fifthly, in terms of cost, Annex 3 to the consultation, the evidence base, suggests that if 288 local authorities were required to produce waste prevention plans a cost of £250,000 would represent a reasonable assessment of the order of magnitude for the cost of the

same. In North London the production of a joint waste strategy cost in the order of £60,000, taking into account the need for associated strategic environmental assessment (SEA), equalities impact and habitat assessment, but excluding significant officer time from Partner authorities. The production of our waste prevention implementation plan cost considerably less, but largely because the screening exercise undertaken for SEA concluded that SEA was not necessary for the prevention plan. However, if the conclusion of the screening had been that SEA was required then the production costs of the prevention plan could have been of the same order of magnitude as the strategy itself. We would therefore argue that it would be much more cost effective for a national waste prevention programme or plan to be produced, rather than requiring individual local authorities to produce their own.”

- 1.2.4 We assume that one of the main reasons why the residual waste target set in Waste Strategy 2007 is for waste ‘not re-used, recycled or composted’ rather than for a total waste figure is because it is recognised that the public sector can have limited impact upon the total amount of municipal waste arising, but it can have an impact on the proportion of the total that goes to disposal. Manufacturers and retailers have more impact upon the total amount of material produced. This approach appears logical.

3. What measures might the Mayor most valuably lobby government for?

- 1.3.1 Voluntary codes of practice play an important role in helping the waste industry demonstrate its environmental and social responsibility. However, there are occasions when they do not capture a high number of operators due to their voluntary nature. If statutory mechanisms are in place it can be ensured that the entire sector meets its social and environmental responsibilities. One example where a statutory mechanism might be considered is in regard to unwanted advertising material, often known as “junk mail”. The Mailing Preference Service or MPS is an industry run system which many direct marketers sign up to, allowing residents to opt out of receiving addressed advertising material. Many local authorities run “no junk mail” campaigns as part of their waste prevention work, however this does not capture un-addressed material that is hand-delivered. While “no junk mail” stickers on doors may dissuade some companies from placing their advertising in letterboxes, these stickers currently do not carry any legal status and can be ignored.
- 1.3.2 This issue has been recognised in Victoria, Australia where the use of a sticker stating ‘no junk mail’ or ‘no advertising material’ is protected through the Environment Protection Act 1970. The Act makes it an offence for advertising material to be placed in a letterbox where such a sticker is on display, punishable by an ‘on the spot’ fine or a fine issued by a court. This is a change in the law which the Mayor could lobby government for.
- 1.3.3 In the area of recycling it would be useful if the Mayor London could lobby for minimum recycled content legislation or alternatively a less blunt instrument such as a VAT break on recycled content materials in order to further stimulate closed loop recycling which would potentially benefit London as a region and the businesses involved.

- 1.3.4 The third area that the Mayor could valuably lobby government for would be more transparent use of Packaging Recovery Note (PRN) money and/or a more robust approach to consumer information obligations imposed upon obligated packaging companies. If for example companies obligated under the packaging regulations were required to provide an amount of money per obligated tonne to demonstrate compliance with the consumer information obligations already contained within the packaging legislation this would provide a useful and ongoing funding source for national campaign work as well as providing a demonstration by the businesses involved that they were meeting their consumer information obligation requirements. The Environment Agency (EA) may also need further resources in order to effectively monitor and enforce compliance.
- 1.3.5 Fourthly, irrespective of whether the Mayor uses WRATE (Waste and Resources Assessment Tool for the Environment) for his proposed Greenhouse Gas indicator assessments of waste management approaches in the capital, it would be useful if the Mayor could lobby for further funding for WRATE and for standardisation of life-cycle analysis (LCA) approaches across the board. The current version of WRATE includes some 'standard' EA verified processes based upon existing facilities, but some of these facilities are now relatively old and it would be helpful if WRATE could be updated to include new facilities and processes.
- 1.3.6 There are other suggestions at various points within this response too.

4. What do you think will be the main barriers to achieving targets set on reduction of household waste? How can they be overcome?

Barriers

- 1.4.1 One of the key barriers to achieving household waste reduction targets is the historic focus on recycling and recovery of materials, rather than the prevention of materials becoming waste in the first place. Even though recycling has undeniable environmental benefits, it is significantly less beneficial than waste reduction. So far, whilst there is a number of recycling related success stories at a local and national level, a similar level of effort has not been focused on waste reduction and this lack of historic focus and momentum for waste reduction initiatives is a key barrier going forwards.
- 1.4.2 As already mentioned above, if reduction targets are 'total waste' based then the ability of local authorities to influence the same is limited. Supply side interventions focused on product producers and suppliers may have a much greater impact than demand side measures focused on product users. Therefore another barrier to the achievement of reduction targets is that suppliers have an influence on these targets and this is something outside of local authority control.
- 1.4.3 Another barrier is the complexity of the prevention message, as the Defra evidence review has indicated and therefore there is a need to tailor messages to individual waste streams.
- 1.4.4 Fourthly, the achievement of waste reduction targets can be largely invisible to the householder, so unlike recycling where the householder can see if they are recycling a lot, it is much more difficult for householders to see that they

are producing less and therefore helping to reach targets or benefit themselves. Coupled with this, the visible positive benefits associated with recycling, such as sitting on recycled plastic furniture or buying a fleece jacket made out of recycled plastic bottles are not there for waste reduction. There is nothing to show for not producing something in the first place.

Ways to overcome the barriers

- 1.4.5 In order to overcome the barriers of a lack of visibility and success stories for reduction, it would be useful if national, regional and local level publicity could be used to showcase some of the achievements of residents and businesses who have reduced their waste. For example after the North London prevention focused 2009 'Watch Your Waste Week', householders, businesses and schools who had successfully reduced their waste (by an average of 50%) were presented with a certificate acknowledging their achievements in waste reduction. Improved publicity coupled with the inclusion of reuse within national targets will help to raise the profile of reduction and ensure that prevention messages become more visible.
- 1.4.6 The barrier of the supply side influence on household waste reduction targets can be best overcome by the use of voluntary and legislative targets for suppliers. Further initiatives such as the Courtauld Commitment (a voluntary agreement between WRAP and major grocery retailers and brand owners which is leading to new solutions and technologies so that less food, products and packaging ends up as household waste, and the Packaging Essential Requirements regulations) are needed.
- 1.4.7 Support for any further European extensions to producer responsibility, including possibly lobbying for a Europe-wide approach to the junk mail issue identified above (noting the associated lead times) would be constructive too.
- 1.4.8 The Defra evidence review advises a separation of messages for waste prevention in order to overcome the complexity of the issue. This is an approach which the Authority and its constituent borough councils have acknowledged in the new waste prevention plan for the area (2010 -12).
- 1.4.9 One of the ways the barrier of the invisibility of waste reduction achievements can be overcome is by linking waste reduction initiatives to benefits, such as money saved e.g. through food waste reduction or use of reusable nappies; or linking the householder's actions to the benefits they provide to others such as a local charity e.g. by providing furniture or clothing for reuse. However, it has to be recognised that some reduction initiatives will continue to have an intangible benefit to the householder, such as a reduction in unwanted mail and that this may make them more difficult to promote and encourage. Increased communication with householders to extend participation in such initiatives, potentially supported by mandatory measures placed on suppliers, like the proposals outlined in paragraph 1.3.2 above will be needed to ensure that these measures are taken forward.

5. This target, when coupled with the increase in number of households, will deliver a zero per cent increase in London's net household waste. Do you consider this target to be too high, about right or too low and why?

- 1.51. In the Authority's response to the *Minor alteration to the consultation draft replacement London Plan, Borough level waste arisings and apportionments,*

and corrections and clarifications, Mayor of London, January 2010 the Authority noted that:

“Comparing the borough level waste arisings to North London Waste Authority projections we would comment that:

- The overall change to municipal waste projected in the Minor Alteration is lower than that used in the North London Joint Waste Strategy, modelled growth scenario. For example the main modelled growth rate used in the North London Joint Waste Strategy shows overall growth in the municipal waste arisings of 34.9% between 2011 and 2031. The GLA projections on the other hand show overall growth of just 19.9% between 2011 and 2031.*
- However, the sensitivity analyses that have been used in the North London Joint Waste Strategy show growth between the same years of 48.6%, 22.0% and 10.5%. Therefore the projections used in the Minor Alteration to the London Plan are within the North London Joint Waste Strategy’s growth range.*
- Recent reductions in municipal waste arisings also suggest that the recent growth rates are lower than projected, but could rise again.*
- We therefore conclude that the projections used in the Minor Alteration to the London Plan are lower than our previous projections for the North London Joint Waste Strategy but clearly reflect more recent dips in arisings.*

Accordingly the Authority believes that the borough-level waste arisings are broadly in line with our most recent projections although slightly low compared to our earlier modelling work.

We would caution against the under projection of waste arisings however, given the implications for land-use planning and the allocation of land for waste facilities.

1.5.2 Therefore, from a north London perspective the target and projections for waste arisings seem reasonable, as long they are supported with an appropriate level of effort on communications campaigns to impact on material demand and a supportive national framework to influence supply.

1.5.3 However, whether the figures in north London are consistent with the rest of London is difficult to assess and we would caution that under-estimating waste growth risks procuring waste facilities that are too small and that procuring further facilities later to fill the gap will be more expensive. We would also caution that the recent dip in waste arisings may not be sustained for the long term, so it will be important for the Mayoral team to monitor arisings carefully on an ongoing basis to assess whether predictions are being realised.

6. *What do you think are the main barriers to achieving targets for reuse and repair, and how can they be overcome?*

Barriers

1.6.1 There are a number of barriers to achieving targets for reuse and repair in London. Some of these barriers are region specific, others are national issues.

- 1.6.2 Some of the key barriers include:
- Lack of investment/ market gaps – in particular areas of London
 - Lack of information to consumers
 - Lack of adequate marketing of reuse and repaired products
 - Consumers' lack of trust in reuse and the quality of repaired products
 - Operational issues/the capacity of reuse organisations including the difficulties of matching supply and demand across London.
 - Costs – when it is less expensive for someone to buy a piece of flat packed furniture new compared to buying a reconditioned second-hand item, then there is really no incentive to reuse.
 - Potentially therefore another barrier to achieving the targets for reuse in particular could include finding a sufficient market for reused items if collection for reuse increases.
- 1.6.3 Many of the barriers to expanding reuse and repair in London specifically are clearly outlined in a report entitled 'Third sector reuse capacity in London', which was part funded by the North London Waste Authority – <http://legacy.london.gov.uk/gla/publications/environment/reuse-fullreport.pdf>

Ways to overcome the barriers

- 1.6.4 The 'Third sector reuse capacity in London' report mentioned above makes a number of recommendations in order to increase reuse capacity in the capital including strengthening the reuse and repair market by investing in infrastructure and increasing capacity, specifically:
- Reconfiguring all local authority bulky waste services to maximise reuse (and recycling)
 - Strengthening the links between municipal housing services, social services and recycling and reuse services
 - Coordinating reuse services and improving their management information (this would enable peaks and troughs in supply and demand across the capital to potentially be evened out)
 - Focussing and intensifying existing reuse services
 - Providing a development fund to create seven new reuse sites in London
 - Establishing an investment fund to incentivise business reuse
 - Contracting third sector reuse organisations to deliver municipal bulky reuse services
 - Contracting third sector organisations to work with reuse and recycling centres in expanding facilities for the public to drop off reuse items
 - Agreeing a common monitoring framework enabling the payment of collection and reuse credits to all reuse organisations
 - Transforming the Steering Group for the study into a Reuse Taskforce to oversee the implementation of these recommendations within a costed action plan.
- 1.6.5 The recommendations also include a number of suggestions for overcoming the awareness and perception barriers noted above, namely:
- Improving the retail profile of reuse on London's high streets

- Resourcing a strategic marketing campaign promoting reuse to Londoners
- 1.6.6 The cost barrier of reuse is not something which will be easily overcome but potentially with a more coordinated third sector reuse service, this might bring economies of scale which will enable projects to charge prices which are more competitive to the 'buy new' alternatives. Clearly, any new carbon-accounting regimes that may be introduced at international or national level in the future might substantially assist too.
- 1.6.7 In terms of overcoming the barrier of potentially insufficient demand for collected items, as collection for reuse increases, the key will be to ensure that any collection expansion initiative is backed up with a robust business case showing that sufficient outlets exist for the materials collected.
- 1.6.8 Finally the reuse capacity in London report, only reviewed third sector service provision, excluding private sector reuse and repair services. It would be helpful to update the third sector study with some additional analysis of repair in particular so that repair services across the capital might be more easily promoted. This could be combined with raising consumer awareness of product lifespans and the requirements placed upon producers to supply products which are fit for purpose, including information on guarantees, repairs and spare parts. The website for Consumer Direct (<http://www.consumerdirect.gov.uk>) contains a considerable amount of helpful advice and information including, for example, template letters for people to use if goods are not as described/not of a satisfactory quality or not fit for purpose made known at the time of sale.

7. Considering what you know already exists in the reuse sector in London, how do you think the sector could most effectively be developed and supported to improve reuse rates?

- 1.7.1 The Authority has agreed to provide a letter of support for the London Community Resource Network's (LCRN's) proposals for a London wide Integrated London Reuse Network. The proposal includes an integrated network of reuse facilities working together in a coordinated system to hold commonly owned assets and deliver public and commercial reuse services; owned and managed through a dedicated Special Purpose Vehicle (SPV). The aim of the Integrated London Reuse Network is to provide a more consistent reuse service across the capital with an increased amount of material both collected and reused. The proposals fit well with the new draft municipal waste strategy for London and with work carried out to date in north London. The north London work², which has been funded by the Authority, indicates that there is a capacity gap in terms of the ability for the existing organisations in north London to collect sufficient material to maximise reuse. The LCRN proposals would go some way towards resolving this capacity gap and would also enable centralised publicity campaigns to be undertaken to raise awareness of residents about the reuse services available to them. The current scope of the proposals includes furniture, white goods (such as

² Reuse Synergies and Opportunities in North London, Expanding Reuse Provision in the NLWA, LCRN, September 2009

fridges and freezers) and other electrical goods. In the longer term the service may be expanded to incorporate textiles, but as with reuse and repair services, it will be important to look at existing private sector operators who may already be doing much good work.

- 1.7.2 The Authority considers that this proposal from LCRN would be an effective way in which to develop the sector and provide support to increase reuse rates with LCRN managing the performance of their members in the framework and acting as a single point of contact for local authorities. This proposal is therefore a significant and welcome development. In particular, LCRN and its members have the expertise to supply the outlets for much of the reused materials which will be key to service expansion.
- 1.7.3 The other area in which the reuse sector could effectively be developed and supported to improve reuse rates would be in the area of public sector procurement. Sometimes the tonnages of material that can be diverted through local reuse services are very small, insufficient perhaps to justify the procurement of a separate reuse service from a tonnage perspective alone. However, if the social benefits of the service, perhaps in providing training opportunities through a repair and refurbishment service, in addition to consideration of the benefits of providing refurbished household items for people in need are also taken into account, then the reconfiguration of contracts to include reuse may be more attractive. The structure of local authorities does not easily facilitate this type of cross departmental consideration of the benefits of a service or ease procurement processes in this regard. It would be helpful if the Mayor could provide some support in the form of a guidance document, best practice case studies or an event to assist authorities which might be considering this type of approach.
- 1.7.4 A report produced by the In-House Policy Consultancy working for ODPM, DfT and Defra, entitled *Review of the Voluntary and Community Waste Sector in England*, December 2005 which looked at reducing the barriers to the procurement of waste services from the community and voluntary sector noted that:

“A strategic intervention designed to help break the vicious circle described in paragraph 8.2 above, which builds upon existing efforts to strengthen voluntary and community organisations skills and systems and encourage more sophisticated procurement by Local Authorities of services from social enterprise organisations, might introduce arrangements to part-fund and support coordinators/development officers to operate at the interface between CWS (voluntary and community waste sector) organisations and Local Authorities in a particular geographic area.”

Whilst this type of intervention might not be appropriate five years on, the Authority considers that barriers still remain in this area and that by working with third sector organisations such as LCRN, ACEVO (Association of Chief Executives of Voluntary Organisations) and NCVO (National Council for Voluntary Organisations) as well as small business organisations such as the FSB (Federation of Small Businesses) then it might be possible to provide greater opportunities for reuse sector providers in terms of both bidding for and providing reuse services to the public sector in London. This might be a role for the new LCRN SPV discussed in paragraph 1.7.1 above.

1.7.5 Finally the Authority considers that the reuse sector in London could also most effectively be developed by supporting some of the existing networks that exist for reuse services other than furniture, white goods and possibly textiles which may be covered by the reuse framework outlined above. In particular, support for online reuse networks such as Freecycle and Freecycle would be beneficial as would promotional support for accredited repair and reuse centres. In north London for example, the Authority has worked with LCRN to produce a small leaflet listing local reuse services which was distributed to residents at give and take days across the seven north London boroughs, thus providing information to residents about other opportunities for reuse in their area throughout the year.

8. *What do you think are the key elements for an effective programme of action with manufacturers and retailers to reduce packaging?*

1.8.1 The Authority considers that an effective programme of action with manufacturers and retailers to reduce packaging is best devised and implemented at a national level. Manufacturers and retailers operate at national and international levels, so there is a limited amount that the Mayor can do at a regional level to encourage manufactures and retailers to reduce packaging locally.

1.8.2 The Authority also considers that an effective programme on packaging reduction should additionally include targets and penalties for not meeting the same. The voluntary Courtauld Commitment is already in place as noted above to provide a focus for packaging reduction activities and the good work that WRAP is doing nationally with companies which have signed up to the Commitment should not be duplicated locally. On a statutory level the Packaging Essential Requirements Regulations are also in place to ensure that products aren't over packaged and it is a requirement for obligated companies to meet these requirements.

1.8.3 However, there are gaps in the current programme of action with manufacturers and retailers to reduce packaging which the Authority considers are necessary in order to maximise reduction further. These include:

- An awareness raising programme about the requirements, particularly amongst smaller manufacturers and retailers.
- On-the-ground support to provide advice for obligated companies – for example design support to help smaller companies reduce their packaging requirements.
- Incentives to invest in less wasteful design.
- Promotion and encouragement for returnable products and refillable packaging. WRAP is doing some work in this area, but again it is the many smaller companies where such support is potentially just as urgently needed.
- Work with trade associations to embed an understanding of packaging reduction within them and amongst their members. For example it may be possible to consider additional voluntary agreements with trading associations to encourage all their members to sign up to waste prevention plans for example.
- Work with small retailers to promote the purchase of less wasteful and more sustainable products. The Authority and its constituent Boroughs have had some success in this regard including encouraging local

businesses to display waste prevention posters showing what actions they are taking in this regard and also encouraging small retailers to display posters and give out reusable shopping bags and information about food waste.

9. How can the Mayor best measure the direct impact of actions he supports to reduce waste, and increase recycling and reuse? What are the key factors that need to be taken into account?

1.9.1 Changes in waste, such as increases in recycling and reuse can be relatively easily measured, but as there is a range of interventions operating at any one time, it may be difficult to assign the outcomes to any one particular intervention or campaign.

1.9.2 The Mayor can best measure the direct impact of any actions he supports by:

- Obtaining robust baseline data to measure the scale and the progress of any changes and to assist comparisons – for example as mentioned above, supporting an ongoing Tracker survey to measure attitudes pre and post the introduction of a Love Food Hate Waste campaign
- Developing a robust methodology and indicators to monitor progress
- Developing a pan-London consistent monitoring system – although as authorities all provide data to the national waste database – WasteDataFlow, it will only be in additional areas such as attitudes and awareness or more detailed reuse information for example that additional monitoring indicators and requirements may be necessary.

Policy Two: Setting a Greenhouse Gas Standard for Municipal Waste Management Activities to Reduce their Impact on Climate Change.

1. Do you agree with the Mayor's proposed approach for the management of London's municipal waste based on lifecycle greenhouse gas performance? Which waste management activities do you think should or should not be included in a common modelling approach to lifecycle greenhouse gas accounting for waste?

- 2.1.1 The Authority supports in principle the proposal to replace previous waste strategy presumptions for and against specific waste technologies with a more 'output based' approach. However, it is vital that decisions are based upon the merits of individual solutions, rather than preconceptions.
- 2.1.2 The Authority therefore agrees that the Mayor's approach for the management of London's municipal waste should be based on a lifecycle approach but not necessarily restricted to just greenhouse performance. Because such an approach suggests scientific analysis of potential waste technology solutions, it is felt that the Mayor should promote a technology neutral position, rather than promoting specific technology types. This would enable waste management projects to be assessed on the basis of their environmental performance and facility design rather than their perceived performance levels. As such, this would require detailed and rigorous analysis of all technologies ranging from well established solutions to novel / advanced treatment techniques. It would also be helpful if the common modelling approach took account of both collection and processing operations too.
- 2.1.3 From the Authority's perspective we do not wish to preclude the use of any technology and it is our view that it is the responsibility of each waste disposal authority in the capital to decide what technology or mix of technologies will deliver the best solution for its area. This will also include the proper assessment of other factors such as deliverability (which includes the prospect of securing funding, land and planning permissions) and affordability as well as environmental considerations. The Mayor's approach to the management of London's waste therefore needs to recognise that a regional output based approach to decision-making, will be supplemented by the disposal authorities additional considerations around the practical delivery of the solutions and affordability too.
- 2.1.4 Secondly the Authority comments that 'The Mayor's waste management hierarchy' which is included as part of the approach proposed is different from both the European and national model. Whilst it is difficult because the Mayor's waste strategy is being developed at a time when the new Waste Framework Directive has not yet been fully transposed into the UK and the English, Waste Strategy 2007 is still in place, the Authority would recommend that the Mayor's approach should follow the new waste hierarchy in the revised Waste Framework Directive namely:

- Prevention
- Preparing for re-use
- Recycling
- Other recovery, e.g. energy recovery; and
- Disposal

2.1.5 It is also noted that the Waste Framework Directive (Article 4) prescribes that 'When applying the waste hierarchy referred to in paragraph 1, Member States shall take measures to encourage the options that deliver the best overall environmental outcome. This may require specific waste streams departing from the hierarchy where this is justified by life-cycle thinking on the overall impacts of the generation and management of such waste'. Therefore the Authority would recommend that this flexibility is also included in the Mayor's approach to the management of London's waste.

2. What do you see as the key barriers to implementing a lifecycle greenhouse gas performance standard? What are the key steps that need to be taken to ensure its success?

2.2.1 Life cycle assessment studies the environmental aspects and potential impacts throughout a product's or process' life from raw material acquisition through production, use and disposal (e.g., from cradle to grave). The applicable standard, the International Standard ISO14040 series relating to the principles and framework for the conduct of LCAs, follows the structure as set out below:

STEP 1: Goal and Scope Definition - the goal and scope of the LCA study are defined;

STEP 2: Inventory Analysis - the inputs and outputs within a defined system boundary are tallied in an inventory;

STEP 3: Impact Assessment – specific inventory items are aggregated into broader environmental impacts; and

STEP 4: Interpretation - the information provided by the inventory and the impact assessment is interpreted in relation to the goal of the study.

2.2.2 In order to determine the life cycle carbon impact of various technology options, it is important that studies be conducted with due rigour to produce transparent and verifiable results. Ensuring that analyses are carried out with due rigour and structure will be a key challenge for the GLA. Failure to do so will render such studies meaningless and open to manipulation.

2.2.3 Here it should be noted that the assessment of greenhouse impacts should be just one of the considerations in conducting a robust environmental assessment. In addition to greenhouse impacts, other environmental factors which should be considered (at a minimum) are resource depletion, freshwater ecotoxicity, acidification, eutrophication, and human toxicity.

3. Do you agree that focussing on lifecycle greenhouse performance is more effective than focussing on specific waste services or technologies? What level of standard can or should be adopted?

- 2.3.1 Yes. As noted above the Authority supports in principle the proposal to replace previous waste strategy presumptions for and against specific waste technologies with a more 'output based' approach. However, it is vital that decisions are based upon the merits of individual solutions, rather than preconceptions.
- 2.3.2 Of concern to the Authority is that the singling out and promotion of anaerobic digestion, gasification and pyrolysis as "clean technologies" appears to presuppose a performance outcome according to technology types rather than technological advancement and facility design. As such, this policy (Policy Two) holds a number of implications for the Authority in relation to its Fuel Use procurement, particularly as the Authority remains open to the technological solution which may be put forward by the bidding community, for the use of its Solid Recovered Fuel during its present procurement. Applied more widely, the policy also stifles technological innovation.
- 2.3.3 In addition the Authority's other concern is that if the focus on greenhouse gas impacts is so strong, this might have to be followed no matter what the cost. For example if the greenhouse gas performance of a waste management scenario is used as a single 'conformity test' by the Mayor, then the Authority would have concerns that other factors which have to be taken into account by local authorities when deciding on their approach will be either ignored or their relative importance diminished because of the focus on greenhouse gas. Waste authorities should decide locally the relative importance of issues such as greenhouse gas emissions, cost and deliverability for example and it is the waste disposal authority Members who must make the final decisions on contract awards and who are answerable locally. It may be useful for the Mayor to set out his preferred relative weighting of these issues at the public consultation stage when the detail of the greenhouse gas standard becomes available. The Authority is keen to engage further on this issue.
- 2.3.4 In terms of setting the context, in north London, the Authority's Reference Project could be expected to deliver an annual reduction of approximately a 100,000 tonne CO₂-eq compared to a 'do minimum case' – a very substantial contribution to meeting the Mayor's CO₂ reduction target.

4 Do you support the adoption of WRATE as a common modelling approach? Are there any limitations or strengths of adopting this approach? Alternatives and further suggestions?

- 2.4.1 The Authority is pleased to see that the Mayor's draft strategy suggests that WRATE is an appropriate lifecycle assessment tool for measuring the lifecycle greenhouse performance of waste management solutions. WRATE is based upon the International Standard ISO14040 series relating to the principles and framework for the conduct of transparent and verifiable LCAs, according to a robust and structured methodology. Presently, WRATE is DEFRA's standard tool for determining the life cycle impacts of waste management systems in accordance with the guidance from DEFRA's Waste Infrastructure Delivery Programme (WIDP).

- 2.4.2 The Authority and its constituent borough partners have used WRATE to assess a range of different technology solutions and combinations of services to deliver the requirements of the joint waste strategy for the area and have an ongoing commitment to use WRATE as part of the ongoing monitoring of strategy implementation as outlined in the Strategic Environmental Assessment of the strategy. WRATE has additionally been used by the Authority for constructing its Outline Business Case of PFI credits as detailed below.
- 2.4.3 One of the key reasons that Authority's Outline Business Case (OBC) has been constructed using WRATE to assess the carbon impact of different technical options is because this is in accordance with the guidance from DEFRA/ WIDP about an appropriate methodology. The Authority additionally proposes to use WRATE as an integral part of its evaluation methodology to ensure that the outcome of the procurement process is consistent with the commitments made in the OBC.
- 2.4.4 The results of the Authority's WRATE analysis found that the fossil fuel proportion of the Solid Recovered Fuel (SRF) is expected to be in the order of 20.3% with the biomass fraction (including paper, card and textiles) constituting around 66.1%. The fossil fuel fraction is primarily made up of plastic film and dense plastics which are unable to be recycled due to contamination and lack of recycling markets and together amount to 14.4% of the SRF which is not considered by the Authority to be a substantial proportion of the SRF.
- 2.4.5 In considering the production of the SRF, it would not be viable to separate out the plastics from the organic fraction. Were it possible to separate out the plastic fraction, the only disposal route would be landfill or incineration which is considered by the Authority to be a poor solution without CHP.
- 2.4.6 Here the WRATE modelling has found that the Authority's Reference Project has a strong greenhouse benefit above both landfill and EfW producing electricity only and as such would almost certainly fulfil the Mayor's vision that a *"minimum greenhouse gas performance will need to achieve at least a positive carbon outcome, whereby the direct emissions from the technology are offset by emissions savings from the generation of energy in the form of heat, electricity and transport fuel"*.
- 2.4.7 The only limitations of WRATE we would suggest are that the reference facilities included within the model require updating. There are expected to be newer facilities using a range of technologies which it would be helpful for the EA to incorporate within the modelling. Although there is an option in WRATE for the insertion of 'user validated processes' whereby process owners and operators can update WRATE with their own technical information it would additionally be helpful if the EA could update the model with some new processes too.
- 2.4.8 Additionally we would argue that any analysis using WRATE needs to be carried out over the combined waste collection/preparation/treatment scenario, therefore not simply focussing on the treatment process itself. The waste collection and pre-treatment requirements for certain technologies or combinations of technologies could have a substantial environmental impact, which needs to be assessed within the modelling work.

5. *Given these considerations, are there any waste solutions that you consider inappropriate for London?*

2.5.1 No. The Authority remains technology neutral, focusing instead on environmental outcomes, facility performance and proven technologies.

6. *Do you agree that the Mayor's waste management hierarchy is the approach? Are there any other considerations that should be included?*

2.6.1 The Authority recommends that the Waste Management Hierarchy enshrined within the Waste Framework Directive to be transposed to UK legislation by 12 December 2010 is a more appropriate hierarchy to be followed as outlined in our response to question 1 above.

7. *Do you agree that the Mayor should be supporting the development of advanced conversion technologies in London? What do you see as the main challenges in achieving this?*

2.7.1 Of concern to the Authority is that the singling out and promotion of gasification and pyrolysis as “clean technologies” appears to presuppose a performance outcome according to technology types rather than technological advancement and facility design. Consequently, this policy (Policy Two) holds a number of implications for the Authority in relation to its Fuel Use procurement, particularly as the, the Authority remains open to the technological solution which may be put forward by the bidding community, for the use of its SRF during its present procurement. As such, one of the key concerns of the Authority will be to maximise the greenhouse performance of the fuel user by pursuing heat and electrical energy generation.

2.7.2 It should be noted that while the Draft waste strategy makes reference to The Renewable Obligation Order 2002, this has since been replaced by The Renewables Obligation Order 2009 which came into force on 1 April 2009. Accordingly, a key issue emerges in relation to the management of biowaste and SRF within London, in particular the GLA's stated position in terms of its consistency with the Renewable Obligation Order put in place by Government and the consequences of the Mayor's policy and strategy position on the treatment of non-biomass waste that cannot be recycled.

2.7.3 Here, the Authority previously submitted representations to the emerging London Plan to support the inclusion of SRF production within the classification of waste being managed in London. The representation highlighted concerns with the proviso that only SRF that is a biomass fuel as defined by the Renewables Obligation Order 2009 (ROO) will be considered to be managed in London.

2.7.4 Within the ROO 2009, “Solid Recovered Fuel” (SRF) is defined as fuel which:

- (a) *complies with the classification and specification requirements in CEN/TS 15359:2006,*
- (b) *is prepared from a waste which is not a hazardous waste,*

(c) *has a maximum Respiratory Index value of no more than 1500 milligrams of oxygen per kilogram of volatile solids per hour when measured using the real dynamic respiration test specified in CEN/TS 15590:2007, and*

(d) *when subject to a methodology for the determination of particle size in accordance with CEN/TS 15415:2006, is able to pass through an opening measuring no more than 150 millimetres in all dimensions;*

2.7.5 Under section 3 of the Renewable Obligations Order 2009, waste as a renewable resource is defined as municipal waste which is, or is derived from, no more than 50 per cent fossil fuel.

2.7.6 In contrast, section 4(1)a of the ROO 2009 defines “biomass” as a fuel used in a generating station where “*at least 90 per cent of its energy content is derived from relevant material (that is to say material which is, or is derived directly or indirectly from, plant matter, animal material, fungi or algae)*”.

2.7.7 Further, section 4(2)(c) states that a fuel which is used in a generating station with biomass but which is not biomass is to be treated as biomass if:-

(b)(ii) *it is waste and the fossil fuel forming part of it was not added to it with a view to its being used as a fuel:*

(c) *at least 90 per cent of the total energy content of the fuel and the biomass with which the fuel is used is derived from relevant material.*

2.7.8 Therefore material which is 90 per cent biomass by energy content is not considered to be SRF but biomass or fuel.

2.7.9 The Authority is seeking to produce an SRF with a minimum biomass content of 50%. On this basis and the principles laid out in the ROO, the Authority holds the position that the fuel which will be produced through the Waste Services Contract will be an SRF which is a renewable source. To support this position the Authority has consulted with Ofgem (the regulatory body of the ROO) who have indicated that their consultative position is that SRF will be deemed as 50% biomass content. The Authority therefore recommends that the Mayor adopts this same standard.

8. *What do you see as the key issues in retrofitting incinerators and improving their efficiency and greenhouse gas performance? Are you aware of any instances when this has been undertaken that we might learn from as best practice?*

2.8.1 The Authority sees a number of concerns associated with retrofitting incinerators, in particular its Edmonton EfW facility.

2.8.2 As stated in the Authority’s Outline Business Case, we believe that there is insufficient demand for heat now or in the immediate future to see the Edmonton site as a good location for a Combined Heat and Power solution or to adopt a procurement strategy that relies upon the Edmonton site for a fuel use solution. Our primary concern is relatively low local heat demand,

compared to the potential arising from NLWA's waste – the existing Edmonton EfW has little heat offtake.

- 2.8.3 Furthermore, a number of studies have indicated that there is a very fragmented heat demand and the absence of any EsCo or similar approach that provides hope for a small number of energy offtake contracts. Thus far there has been no appetite for CHP solutions among several of the potential significant heat users with whom the Authority has held talks. We further understand that the LDA has also found insufficient heat demand in the Upper Lea Valley to justify the installation of CHP infrastructure in the short term.
- 2.8.4 Notwithstanding this, the Authority remains keen to see proposals coming forward in the context of its fuel use procurement solution that could connect the opportunity provided by the Authority's procurement to CHP developments that are in train. Accordingly, we are continuing a dialogue with the LDA with a view to stimulating an effective market response from this quarter.

Policy Three: Capturing the Economic Benefits of Waste Management

1. Do you think the Mayor's vision for London's waste to be considered 'an opportunity to be exploited' is the right vision? Is it an achievable vision? What are the risks?

3.1.1 Yes. The Authority believes this is the right vision and indeed waste should be recognised as a resource, however, this should not be limited to a resource in London and where treated waste such as SRF may be sustainably transported to an energy demand outside London should also be encouraged.

3.1.2 Given the newness of the Mayor's Municipal Waste Strategy, it is unsurprising that there are some potential inconsistencies between the proposals that are now being put forward and the local North London Joint Waste Strategy that was agreed by the 8 North London authorities and the GLA which therefore creates risks.

3.1.3 Aspects of the Mayor's draft strategy are seemingly of significant interest to Government, including the extent to which the proposed approach is consistent with Defra's market development work on Solid Recovered Fuel and carbon, and the extent to which long term recycling ambitions are consistent with deliverable and bankable procurements. The Authority welcomes Government engagement in the consultation processes and in a way that does not leave NLWA (or other authorities) as having to reconcile conflicting national and regional policy objectives.

2. Do you agree that waste authorities should consider revenue-sharing opportunities with waste management contractors in order to realise some of the monetary value waste can offer?

3.2.1 Yes and this already exists via the DEFRA PFI Scheme payment mechanisms.

3.2.2 The Authority has additionally recently entered into contract with two operators for the processing of commingled recyclable waste at third party materials recycling facilities (MRFs). The MRF contract sets an index-linked gate fee to cover the contractors' basic operating costs and also provides for the Authority to receive half of the monies the contractors receive from the reprocessors for the recyclable wastes collected by our constituent borough councils and sorted under contract to the Authority.

3.2.3 In practice the Authority will receive quarterly payments from its MRF contractors in arrears that are 50% of the contractors' income pro-rata for the tonnage delivered contractually by the Authority.

3.2.4 Under the scheme the Authority will make Commingled Income Payments (CIPs)³ that have the net effect of distributing such income (once received) pro-rata to the individual constituent borough councils that deliver commingled dry recyclables under these contracts. Most boroughs do so to the same specification, but two boroughs currently collect or plan to collect paper and card separately from some or all of their residents. This means that in determining the level of contributions it will make towards relevant boroughs' additional collection costs, the Authority will have regard to the lower level of income it receives for commingled dry recyclables as a result of the exclusion paper and card, as opposed to the higher level of income which will be received for commingled dry recyclables that do include paper and card, and the Authority will therefore make commingled income payments at a correspondingly lower level in such cases. A full report on the operation of the revenue sharing arrangements is available on the Authority's website in the reports from the 10th February 2010 Authority meeting, at:
<http://www.nlwa.gov.uk/admin/uploads/20100210/Agenda%20Item%2014%20-%20Commingled%20Income%20Payment%20Scheme.pdf>

3. What kind of issues do you think waste authorities might encounter in trying to do this? How can the Mayor support them best in pursuing this approach and overcoming problems?

3.3.1 Issues that are likely to be encountered include:

- Concern about risk
- Fluctuations in market prices
- Budgeting
- Decision-making issues about how best to share the revenue amongst the partners
- The powers and legislation under which revenue sharing would be carried out.

Some of these issues are outlined in the Authority report referenced above.

4. Do you know of any good examples of revenue sharing and joint venture arrangements?

3.4.1 Other than the example above and the well-documented joint venture of the Authority with Sita that recently ended by agreement, we are not aware of good examples, although the Waste Improvement Network website at <http://www.improvementnetwork.gov.uk/imp/core/page.do?pageId=might> have some good examples.

³ The Authority will be using its power under s52A(2) of the Environmental Protection Act 1990.

5. Do you think waste authorities should consider owning and operating their own waste facilities?

- 3.5.1 The Authority was established in 1986 as a statutory JWDA with the primary statutory responsibility is for the disposal of waste collected by its Constituent Boroughs councils. Recently the NLWA has embarked upon the procurement of waste facilities which will ensure the delivery of waste services to 1.7M residents in the area.
- 3.5.2 The Reference Project which has been developed with the Outline Business Case for the procurement includes the following facilities:
- Management of a network of household waste recycling centres (HWRCs) and a 30ktpa in-vessel composting (IVC) unit;
 - The development of a 120 ktpa Materials Recovery Facility;
 - Establishment of a 112ktpa anaerobic digester (AD) for source separated food waste;
 - Establishment of 2 mechanical biological treatment (MBT) facilities (potentially incorporating anaerobic digestion) to cater for 585 ktpa of household waste and produce a solid recovered fuel (SRF); and
 - Delivering an energy facility to take up to 320 ktpa of SRF to generate heat and electricity.
- 3.5.3 It is intended that these facilities will be delivered under the Government's Private Finance Initiative which is likely to see the assets revert back to the Authority at the end of the contract period.

6. What support do you think the Mayor could most usefully give to help develop this opportunity for waste authorities? What are the risks for the parties involved?

- 3.6.1 Other parties are already providing support, such as the Waste Improvement Network and 4Ps. It may be most appropriate for the Mayor to provide a signposting service to these other national agencies. However, there may also be a role for the LWaRB in this regard if it is funding the development of new facilities for local authorities.

7. What are the key considerations to ensuring success for waste authorities owning and operating treatment facilities?

- 3.7.1 Others with more recent and longer direct experience may be better placed to answer this question.

8. What do you think are the key areas of waste management that the third sector should be involved in?

- 3.8.1 The third sector typically fills gaps in service provision not supplied by the public or private sector, either through lobbying for the service to be provided, or by delivering the service itself under more mainstream type contractual relationships. Examples include the third sector support, led by Friends of the

Earth, for a Private Members' Bill which led to the Household Waste Recycling Act 2003 to require local authorities to collect a minimum of two materials for recycling at the kerbside, or social enterprise delivery of a kerbside recycling service, such as that provided by Mid Devon Community Recycling and formerly by Ealing Community Transport in several parts of London and beyond.

- 3.8.2 The third sector also sometimes provides services which may be marginal for commercial operators, but which are of benefit to the third sector because of their broader remit incorporating training or placement opportunities for which they may get paid an additional sum and thereby make the service more commercially viable. However, essentially the third sector should be involved in any area of waste management for which they are suitably able and qualified to participate.
- 3.8.3 A report commissioned and funded by Defra '*Benefits of Third Sector Involvement in Waste Management*' November 2009 outlines a number of case studies of third sector involvement in waste management and includes details of a range of services:
- The report's authors estimate that 15% of kerbside recycling was contracted to the third sector in 2003/04, although it is noted that kerbside recycling is now often mainstreamed into large integrated contracts beyond the capacity of third sector organisations.
 - Furniture reuse however is a key service for the third sector, with the report noting that 29% of waste disposal authorities pay reuse credits to local groups.
 - Community composting is also noted as another area of focus, where third sector organisations have contracts with local authorities.
- 3.8.4 Other services provided by the sector include white goods refurbishment, education and awareness raising work, textile and wood recycling and paint reuse. A glance at the London Community Resource Network's website (at <http://www.lcrn.org.uk/>) will identify the wide range of services that the sector delivers in London. However, a key focus tends to be reuse where the sector has an advantage in the sense that its ability to refurbish and find outlets for and distribute refurbished items is significant and something which commercial operators are unlikely to be able to quickly add on to a 'waste' collection service.

9. *What do you see as the key barriers the third sector faces in delivering local authorities reuse and recycling services?*

- 3.9.1 As already noted in our answer to question 6 for Policy 1 (as outlined in paragraph 1.6.1), there are a number of barriers for the sector. Additionally, aspects such as the capacity of third sector organisations to bid for work and procurement criteria relating to financial standing in particular may also preclude organisations from the sector from bidding.

10. How do you think the Mayor can best help overcome these barriers?

3.10.1 The Authority's response to question 6 for Policy 1 (as outlined in paragraphs 1.6.4 to 1.6.7) provides some suggestions.

Policy Four: Achieving 45 per cent Municipal Waste Recycling or Composting Performance by 2015, 50 per cent by 2020, and 60 per cent by 2031.

General comments

We understand for the purposes of clarification, that these targets are consistent with national targets in that they incorporate reuse, in addition to recycling and composting, however, that they are not identical in that the targets are for municipal rather than household waste. It would be helpful if the next draft of the document could clarify the position regarding the fact that reuse is included within the targets outlined above and potentially provide some explanation of the reason for including municipal rather than household targets in the strategy.

Additionally, the NLWA believes that the current targets contained within the North London Joint Waste Strategy, which reach 50% recycling in 2020 will be exceptionally challenging, so we have concern that a further 60% target is being set on a London-wide basis. If this is a London-wide target and some authorities have already committed to infrastructure which will enable them to meet the current lower Mayoral targets, the Authority has concern that authorities such as ours might be required to even go beyond the targets stated above to make up the shortfall.

The draft waste strategy for London states that the targets above are consistent with targets set by West London Waste Authority and the South London Waste Partnership. There are no inner London boroughs in either of these areas, so they do not have the density of high-rise and other multiple occupancy premises to service that we do in much of north London. Secondly with the potential to collect more green garden waste for composting from the outer London boroughs compared to inner London boroughs, simply because of the relative difference in the number of gardens, this means that there is relatively a greater opportunity for areas such as West London Waste Authority and the South London Waste Partnership to meet targets through composting than in areas such as North London. We therefore have concerns that applying a London-wide target based upon West London Waste Authority and the South London Waste Partnership targets is overly ambitious.

Finally, the Mayor will have to give due consideration to the Government's forthcoming consultation on the legal definition of 'municipal waste' so that there is no conflict between his strategy and European law and obligations.

1. Do you agree that food waste collection services, recycling services to flats, on-street recycling services, and business waste recycling services offer the greatest opportunity for increasing recycling rates? Is there something else, if so, what?

4.1.1 Yes. The Authority agrees that these services will play a significant part in increasing recycling rates, particularly accessible recycling services to flats,

however, we also consider that there may be opportunities to increase participation and capture rates from existing kerbside services, which may be a more cost effective approach in terms of additional tonnes collected. In north London for example, from kerbside dry recyclable services alone we estimate only a 31% capture rate of targeted materials for 2008/09 with no change in this figure predicted for 2009/10. Given the existing investment in infrastructure and services to deliver this material it is important not to lose sight of the need to build up participation in existing services too.

- 4.1.2 Additionally, the approaches for increasing the performance of existing services are well known as outlined in the WRAP toolkit for improving participation in low performing areas. One useful support service which the Mayor could provide would be to let a framework contract for doorstepping for London, into which London authorities could tap in if they needed doorsteppers to deliver a service in a particular area of low performance.

2. Do you agree that incentives should be developed to encourage people to recycle more? What should be the key considerations when developing such an approach? What do you think the best incentive options are that we should develop in London?

- 4.2.1 Yes. The Authority believes incentives are a good way to encourage people to recycle, and one of the north London boroughs, Haringey, participated in the Defra incentive pilot trials in 2006. However there has to be a balance between the cost of the incentive and the increase in recycling. The incentive may in some cases appear unfair, for example, a householder acting higher up the waste hierarchy who reduces waste and hence recycles less in weight will not receive the same reward as a household which reuses less or does not minimise waste, but recycles more. We understand that there are opportunities to incentivise both prevention and recycling, but the design of these systems needs careful consideration to ensure that the 'top end' of the waste hierarchy is not forgotten.
- 4.2.2 The other consideration for incentive schemes is the ability for the scheme to maintain a long term change in behaviour. Incentive schemes need to be refreshed and developed in order for the incentives to continue to remain a sufficient motivator for people to take part.
- 4.2.3 There is also a risk that if the incentive ceases, people's behaviour may revert back to the situation prior to the introduction of the incentive, so consideration needs to be given to what happens once the incentive stops.
- 4.2.4 The other consideration with incentive schemes is that whilst they might change behaviour, they may not have changed attitudes, which is the more important change that we need to see in the long term.
- 4.2.5 From an equalities perspective another consideration is the ability of everyone to have access to the incentive. The Equalities Impact Assessment of the North London Joint Waste Strategy for example considered such issues, and it would be important for any incentive to be able to apply equally to residents living in flats as well as those in low rise properties.
- 4.2.6 Finally, the selection of the reward is also a consideration, for it needs to reinforce the action required to receive the reward. As an example, in north

London we encouraged residents to submit recipes for cookbook, which used leftovers which would otherwise have gone to waste. The residents who submitted winning entries received a hamper containing a voucher for an organic food delivery, but importantly also a range of food waste reducing items too, such a spaghetti measure, storage containers, fridge thermometers etc. The conditions on the food voucher also meant that it could be redeemed either as a whole or in part over the course of a year, so that residents weren't encouraged to buy more than they needed to.

3. Are you aware of any local recycling and composting campaigns that we might be able to bring together with regional initiatives through Recycle for London? If so, what are they?

- 4.3.1 The NLWA took part in the WRAP pilot for a waste electrical and electronic equipment (WEEE) recycling campaign in 2009. Whilst the results in north London were relatively poor compared to other pilot areas, the campaign still had a positive impact on WEEE tonnages collected during the campaign period, compared to the previous year. One of the reasons we suggest that the north London campaign was less effective than in other areas was because north London had no radio advertising which other areas did. The reason for this was that the area was too small to find a radio station to cover it and the GLA were also at the time promoting recycling of other products on a pan-London level. A WEEE campaign would be an ideal campaign to run across the whole of London, and which could use pan-London radio stations and standard WRAP branding.
- 4.3.2 WRAP has a considerable number of case studies of best practice on other aspects of communication, it would be worthwhile considering whether any of these specific initiatives could be usefully replicated at a pan-London level.
- 4.3.3 We have also already mentioned above that food waste would be another useful target for a regional campaign. Both north London and Western Riverside areas have already undertaken food waste communication initiatives and given the difficulties of promoting a range of different recycling collection systems a waste prevention campaign, such as food waste would be extremely useful.

4. What support might the Mayor best offer to improve recycling levels of small business waste?

- 4.4.1 One of the suggestions to improve recycling levels of small business waste would be for the Mayor to work with business districts to see if it would be possible to bring in some shared services for recycling.

5. If the Mayor were to lobby government to adopt a scheme that better incentivises boroughs to collect non-household municipal recyclables, what types of policies or incentives do you think would be most effective?

- 4.5.1 There is limited incentive at present for local authorities to collect non-household waste for recycling. A key concern for the NLWA as a disposal authority is the risk that if our constituent boroughs promote a business waste recycling service to any significant degree (rather than just promoting the service to existing customers), then they will bring in additional new

customers and thus increase the LATS (Landfill Allowance Trading Scheme) burden placed upon the Authority. By default this makes it more difficult for the Authority to reach its LATS targets leading to the risk of needing to buy LATS allowances or face possible fines for non-achievement.

- 4.5.2 Waste authorities still have finite landfill allowances, and face the risk of £150 per tonne fines if they breach the trading system. Adding small businesses to the municipal waste stream (however positive it may be environmentally) either decreases the potential for disposal authorities to sell surplus allowances or increases the risk of waste authorities receiving automatic fines. For every 100kg of waste that is brought into the municipal waste stream there is a need to recycle or compost 68kg of biodegradable waste to stay neutral; if less than 68kg is recycled or composted then there is a negative LATS impact.
- 4.5.3 It is anticipated that there will be forthcoming consultation on these issues, including the classification of waste under the Controlled Waste Regulations (Schedule 2). This will provide an opportunity for the Mayor to lobby for change to deliver greater recycling from business, without placing an added financial burden or risk on local authorities. Thereafter the Mayor will be able to set targets that are viable within the new legal framework.

6. Are you aware of any effective solutions to providing recycling services to households that are not easily accessed from the street that might be rolled out across London? If so, what are they?

- 4.6.1 The NLWA encompasses two of the ten most deprived Authorities in the UK, and such deprivation has been identified by successive studies as a significant barrier to high levels of recycling and composting performance. Furthermore, all of the Constituent Boroughs have considerably higher proportions of flatted properties which also represent a considerable barrier to the collection of waste for reuse, recycling and composting but is also a significant barrier to effective incentive and compulsion measures.
- 4.6.2 Accordingly, part of the solution which the Authority has developed in its Reference Project incorporates mechanical and biological treatment (MBT) to deliver additional recycling contribution above and beyond kerbside recycling services. In addition, the network of HWRCs will be expanded and enhanced to deliver greater levels of recycling and reuse within the Authority.
- 4.6.3 Looking at solutions to increase the tonnage collected and participation in the recycling services delivered to flatted properties, the WRAP guidance 'Recycling Collections for Flats', which is available at www.wrap.org.uk provides some indicators of effective approaches.

7. Do you agree with the Mayor's proposal to consider retrofitting existing flats and social housing estates with facilities to improve recycling rates?

- 4.7.1 Yes, although our constituent borough councils acting as waste collection authorities will be more able to comment on this.

8. *Do you agree that establishing a network of “on-the-go” recycling bins should be done using public and private funds?*

- 4.8.1 Yes. The Authority’s response to the government consultation on ‘Recycling on the Go’ in 2007 supported the principle of on-the-go recycling bins: “Because public place recycling bins help to promote and reinforce good practice (recycling) behaviour in the home and at work, recycling ‘on the go’ adds additional recycling tonnage and helps to reduce residual waste for disposal in line with the waste hierarchy and because the provision of public place recycling ensures consistency of service across different aspects of life, bridging the home/work divide.”
- 4.8.2 If private funds are available to support such services e.g. through charging for advertising space on the bins, or encouraging local companies to sponsor bins, then this reduces the cost to the public purse.

5 *What do you think are the primary considerations when developing ‘on-the-go’ recycling bins across London?*

- 4.9.1 The Authority is not responsible for waste collection so the collection authorities will be able to provide more comprehensive views on this. However, some of the considerations we believe might be:
- The need for staff assistance and participation in recycling initiatives – e.g. for recycling bins on train stations or in bus termini as opposed to ‘on-the-go’ bins at a street corner.
 - The need for contractual arrangements or planning consents to include participation in on-the-go recycling schemes – e.g. outside stations for example.
 - Considerations about collection container type to reduce the potential for contamination, vandalism and fire or any other risk. Ideally the container type should be consistent across London.
 - The importance and need for cross-sector working in order to provide a comprehensive service.
 - Type and size of advertising panels on the bins relative to information messages about what to put in them.
 - Density of containers across an area, hot spots for rubbish and times of the year when the bins are likely to be used much more e.g. in a shopping area in the run-up to Christmas.
 - Branding – we would recommend the use of the national ‘Recycle Now’ iconography on the bins.
 - The need to size containers and set collection schedules appropriately so that they are not immediately filled and surrounded by rubbish on day one. Any on-the-go recycling bins which don’t enhance the street scene are difficult to justify.

6 *Do you agree with the Mayor’s approach to increasing municipal recycling or composting performance? What else could he do to help boroughs improve performance?*

- 4.10.1 The NLWA’s Reference Project within its Outline Business Case is predicated on achieving a 50% recycling and composting rate across the NLWA area. As reflected by DEFRA and WRAP in relation to the Authority’s Outline

Business Case this is a substantial challenge and will require significant participation and capture rates, including the vast majority of plastics.

- 4.10.2 As outlined in the Authority's response to the consultation on the London Plan, the NLWA is concerned that a municipal recycling and composting rate of 60% by 2031 as outlined in the consultation draft London Plan, could be difficult to achieve without the introduction of additional measures from central government, be that incentives or penalties for recycling or not, and sufficient local authority finances in place to make these improvements happen. We therefore believe that whilst the Mayor's approach is good, the targets themselves are overly ambitious, particularly considering the relative performance of particularly some of the inner London boroughs without access to green garden waste, with which to increase composting tonnages in order to reach the overall targets.

Policy Five: Catalysing Waste Infrastructure, Particularly Low Carbon Technologies

1. Do you think the Mayor's proposals will successfully secure those elements of investment for London's waste infrastructure?

5.1.1 Opportunities for CHP and heat networks within London are limited by the lack of existing infrastructure. Without significant regional or central funding to support the primary infrastructure the prospect of solutions coming forward from the market is unlikely. This will act as a barrier to the Mayor's vision of self sufficiency.

2. What else can the Mayor do to close the residual funding gap to deliver the waste infrastructure London needs?

5.2.1 Schemes such as the Renewable Heat Incentive where a financial benefit is realised may assist in making schemes more commercially and financially viable.

3. Do you agree that the Government should continue to fund the London waste board beyond 2012? What would you want to see to be convinced this should occur?

5.3.1 Yes, however the Authority believes that the funding available should also be used to deliver projects with a clear benefit to the public sector.

4. Do you support the Mayor's vision to develop new and existing waste facilities for reuse, recycling, and renewable energy in London to move the city's waste management further towards self-sufficiency and catalyse further waste infrastructure?

5.4.1 The Authority welcomes the support for the production of renewable energy from waste sources. The approach supports the proposed delivery of the waste services facilities identified in the Authority's reference project, including Anaerobic Digestion within North London.

5.4.2 In respect to the Authority's fuel use procurement, the policy framework is also helpful in maximising the prospects of London fuel use solutions coming forward in response to the Authority's procurement and doing so with a better prospect for CHP than would otherwise have been the case.

5.4.3 There are few existing CHP opportunities in London where there is a significant heat demand at a single location. The Authority has therefore agreed with DEFRA/ WIDP that a 'lots' approach would maximise the prospects of a London solution whilst not undermining the desire of Government to avoid a very fragmented procurement outcome.

5.4.4 It should be noted that while the Mayor's Draft Municipal Waste Strategy makes reference to The Renewable Obligation Order 2002, this has since been replaced by The Renewables Obligation Order 2009 which came into force on 1 April 2009. Accordingly, a key issue emerges in relation to the

management of biowaste and SRF within London, in particular the GLA's stated position in terms of its consistency with the Renewable Obligation Order put in place by Government and the consequences of the Mayor's policy and strategy position on the treatment of non-biomass waste that cannot be recycled.

5.4.5 Here, the Authority previously submitted representations to the emerging London Plan in relation to the inclusion of SRF production within the classification of waste being managed in London. The representation highlighted concerns with the proviso that only SRF that is a biomass fuel as defined by the Renewables Obligation Order 2009 (ROO) will be considered to be managed in London. The Authority believes that the Mayor should recognise SRF with a minimum 50% biomass content as renewable.

5.4.6 In considering the production of the SRF, it would not be viable to separate out the plastics from the organic fraction. Were it possible to separate out the plastic fraction, the only disposal route would be landfill or incineration which is considered by the Authority to be a poor solution. Accordingly, in undertaking its procurement, the Authority does not intend to preclude fuel use solutions outside of London which are able to utilise more sustainable forms of transport for fuel delivery, thereby delivering an overall carbon benefit from the management of the Authority's waste.

5. Do you agree with the Mayor's vision to treat waste within London and as locally as possible to the source, to encourage self-sufficiency and to realise the value from waste disposal?

5.5.1 The Authority supports the vision to manage as much waste as possible within the London boundaries. However, as our response above illustrates in paragraph 5.4.6 the Authority does not intend to preclude fuel use solutions for its long term procurement process, which are outside of London.

6. What do you see as the key issues that might arise in trying to improve and develop existing waste treatment facilities? Do you agree with the shift to only landfilling reject and inert residues from recycling and energy recovery?

5.6.1 The Authority supports the improvement and development of existing waste treatment facilities, although we consider that they key issues which might arise include:

- Planning difficulties if sites are going to change from one waste use to another e.g. from a transfer station to a processing facility.
- Residents' concerns.
- The time period between an 'old' facility been closed and a new facility opening which can cause additional concerns for members of staff.

5.6.2 The Authority also supports the shift to only landfilling reject and inert residues from recycling and energy recovery.

7. Do you agree that the Mayor should be working to encourage more sites in London for new technologies to treat waste in a sustainable way? Do you see any problems with this; are there any considerations that should be made in taking this direction?

5.7.1 Please see our previous response in this regard.

8. What are the key issues likely to arise when considering retrofitting London's incinerators to capture heat generated for local use? Is there likely to be scope for undertaking this type of project?

5.8.1 In principle the prospect of retrofitting existing incinerators to capture heat is desirable but needs to be judged on a case by case basis.

5.8.2 Notwithstanding the feasibility of modifying or fitting a CHP engine, installation of a heat network requires a significant capital investment. Therefore, the decision should be based on a balanced consideration of the engineered front end solution, local heat demand, environmental benefit, economics and the existing life of the incinerator.

9. Do you agree with the Mayor's support for the conversion of landfill gas for energy generation? What do you see as the main issues to achieving this?

5.9.1 Yes the Authority supports this principle. Indeed the percentage of landfill sites used by the Authority which recover energy from the landfill gas is one of the indicators that is used for monitoring the implementation of the North London Joint Waste Strategy.

Policy Six: Improving Londoners' Quality of Life

The Authority considers that our constituent borough councils are better placed to answer the questions associated with Policy 6.

1. *Do you think the Mayor should set a benchmark for street cleanliness in London?*

2. *Do you agree that stronger enforcement strategies across London would result in a reduction in litter?*

3. *Do you think government should direct more national funding for litter and chewing gum campaigns to London leading up to the Olympics?*

4. *Should the Mayor work with tobacco manufacturers for the purposes of raising awareness and changing the behaviour of smokers who drop cigarette ends on the ground?*

5. *What, if any, are the measures that you think are missing to achieve clean streets for London? Are there particular approaches or stakeholders that are important but not mentioned above?*