

**NORTH LONDON WASTE AUTHORITY**

**REPORT TITLE:**

**DEFRA REVIEW OF ENGLAND'S WASTE STRATEGY  
CONSULTATION**

**REPORT OF:**

**HEAD OF WASTE STRATEGY AND CONTRACTS**

**FOR SUBMISSION TO:**

**AUTHORITY MEETING**

**DATE:**

**5<sup>TH</sup> APRIL 2006**

**SUMMARY OF REPORT:**

This report sets out the key matters raised in a public consultation paper issued by the Department for Environment, Food and Rural Affairs (DEFRA) which forms an important stage in the Government's process of preparing a revised waste strategy for England. The main principles of the Authority's response are outlined in this paper with a proposal that the response is prepared and finalised by the Head of Waste Strategy and Contracts in consultation with the Chair.

**RECOMMENDATIONS**

The Authority is recommended to:

- (i) approve the principles of the Authority's response as already outlined, and as summarised at Appendix 1.
- (ii) delegate authority to the Head of Waste Strategy & Contracts, in consultation with the Chair, to prepare and submit a full response to the consultation based upon the principles outlined in this report.

**Signed by: Head of Waste Strategy and  
Contracts**

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**Date:** .....

## 1. INTRODUCTION

- 1.1 In England around 100 million tonnes of municipal, commercial and industrial waste is generated each year. This amount continues to grow year on year. Whilst waste cannot be eliminated, its environmental impact can be reduced by preventing it wherever possible and making more sustainable use of that which is produced.
- 1.2 In *Waste Strategy 2000 (WS 2000)* the Government set out its vision for waste management in England and Wales<sup>1</sup> over the next 20 years and at the same time also made a commitment to undertake periodic reviews of the strategy. The first of these reviews is occurring now and the consultation document *Review of England's Waste Strategy: A Consultation Document*, February 2006 is the result.
- 1.3 **The Consultation Document:**
- a) Sets out the progress made since 2000 in meeting the Government's objectives and implementing its policies; and
  - b) Consults on proposals to revise *WS 2000* and the policies for implementing it.
- 1.4 The Government proposes to publish the revised waste strategy in late 2006. This will consolidate current policies alongside the new proposals and will supersede *WS 2000* entirely. The revised waste strategy will be designed to deliver the Government's objectives for waste within its overall sustainable development strategy 2005, *Securing the Future*. It is also proposed that the revised strategy will be closely integrated with the Government's action plan on sustainable consumption and production (SCP), which is also due to be published by the end of 2006, as waste is a key part of the SCP agenda.
- 1.5 The consultation process is being carried out on-line by an external agency, which allows considerable flexibility in terms of updating responses and enabling more than one person from a particular organisation to see and amend the organisation's response on-line at the same time. The main principles of the Authority's response are outlined in this paper with a proposal that the response is prepared and finalised by the Head of Waste Strategy and Contracts in consultation with the Chair. It is proposed that this response is then submitted separately by email and in hard copy to DEFRA in the normal manner.

## 2. SUPPORTING DOCUMENTATION

- 2.1 Accompanying the *Review of England's Waste Strategy, A Consultation Document* is a partial Regulatory Impact Assessment and an Environmental Report. The partial Regulatory Impact Assessment assesses the impacts of the main proposals in the consultation document, whilst the Environmental Report provides an assessment of the likely significant effects on the

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<sup>1</sup> The new waste strategy will be for England only as the devolved administrations now produce their own national strategies.

environment of the proposals and reasonable alternatives. The Environmental Report has been written to meet the requirements for Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC (also known as the SEA Directive). Accompanying the Environmental Report is also a non-technical summary of the same. The following section focuses on the key findings of the Environmental Report and then goes on to outline the key aspects of each chapter in the main consultation document.

### **Environmental Report**

- 2.2 Key to the environmental assessment process was establishing the existing environmental situation in England that could be altered by implementing the revised waste strategy to be adopted at the end of the consultation process. The environmental impacts associated with waste arisings and their management were considered in relation to 27 environmental indicators which encompassed the general themes of biodiversity; flora and fauna; landscape character; culture and heritage; water quality; soil resource and land contamination; air quality; climatic factors; resource utilisation and depletion; human health impacts and waste crime.
- 2.3 The environmental impact on a national scale that was identified as being most significant through this process was the generation of greenhouse gases, particularly methane, which are caused primarily by the degradation of plant and animal waste disposed to landfill. Waste sector emissions of all greenhouse gases accounted for approximately 2% of UK emissions of greenhouse gases in 2003, but have fallen from a contribution of 5% in 1990.
- 2.4 For the proposed revisions to the waste strategy and the environmental assessment, consideration was also given to the developing policy context at international, EU and national level.
- 2.5 In order to assess and inform the strategic proposals to be put forward in the consultation document, four strategic alternatives (presented as scenarios) were developed as alternatives to the current policies contained in *WS 2000*. A baseline scenario of 'no change' to the existing strategy was also put forward against which the alternatives could be assessed. The five scenarios were:
0. No change to existing waste management policy
  1. Reduce waste arisings
  2. Enhanced/increased recycling
  3. Increase the amount of energy generated from waste (Scenario 3A – enhanced rate; and Scenario 3B – further enhanced rate)
  4. Increase the amount of waste diverted from landfill

- 2.6 The result of this assessment showed that:
- Scenarios 1 to 4 all offered environmental benefits over Scenario 0.
  - All scenarios require significant increases in waste management infrastructure, both landfills and waste treatment facilities. Between 667 and 976 additional waste management facilities (excluding landfill sites) are estimated to be required by 2020.
  - Scenarios and policies that focus on waste prevention (Scenario 1 – Reduction in waste arisings) offer greater environmental benefit than the other scenarios in terms of the indicators used in the environmental assessment. This includes benefits in terms of needing the least number of facilities and the lowest amount of waste disposed to landfill. The assessment confirmed the importance of waste prevention at the top of the waste hierarchy.
  - Scenarios that promote higher levels of recycling perform somewhat better in climate change terms than those that promote energy-from-waste. The carbon savings by 2020, relative to the 2002/2003 baseline for scenarios 1 and 2 (increased prevention and recycling) were each estimated to be more than 6 million tonnes. However, it was estimated that most of these savings would occur outside the UK as recycling displaces raw material extraction and production elsewhere in the world.
  - All the scenarios would be accompanied by a significant reduction in greenhouse gas emissions relative to 2002-2003.
- 2.7 The assessment concluded that the waste hierarchy provides a sound environmental guide to help inform the future waste strategy for England. It consequently concluded that the revised waste strategy should focus on increasing the efficiency of our use of resources, with policies developed within the overall framework of the Sustainable Consumption and Production (SCP) agenda.
- 2.8 The remainder of this paper focuses upon the key issues raised in the consultation document and outlines the broad principles to be included in the Authority's response, chapter by chapter. These principles are also summarised in Appendix 1 which Members are asked to endorse.
- 2.9 The DEFRA consultation document itself includes 53 questions to which it is proposed that the Authority responds. It is proposed that the final response is prepared and finalised by the Head of Waste Strategy and Contracts in consultation with the Chair but that this response is based upon the principles described outlined in the sections below.

### **3. REVIEW OF WASTE STRATEGY 2000**

- 3.1 Chapter 1 of the consultation document outlines the need for a review of Waste Strategy 2000, looks at progress made to date and establishes the

rationale for setting a national waste strategy within the product supply cycle, the SCP framework and the wider sustainability agenda for the whole of the UK.

- 3.2 The consultation document concludes that since 2000 performance has moved in the right direction with, for example, local authorities on course to meet the 2005 national household waste recycling target of 25% set in *WS 2000* but not meeting the recovery target for municipal waste for 2005 of 50% that had been set in *WS 2000*.
- 3.3 So, progress has been made but more could be done and the consultation document notes in particular that a policy of diverting waste from landfill could save around 6 million tonnes of carbon equivalent emissions by 2020, equal to about 3% of current UK emissions, a powerful driver for change.
- 3.4 The analysis concludes that the country needs to move away from a waste policy framework designed as an end-of-pipe solution, towards a framework that seeks to better manage the flow of resources through the economy as part of the wider production and consumption cycle, based upon life-cycle thinking.
- 3.5 The principles of the Authority's response to the question posed in this chapter would be:
  - General support for the overall approach of the new waste strategy, but a request for further clarification regarding the interface between business and local government in relation to implementing the strategy and reaching targets. In particular it is recommended that the Authority questions the relative impact that can be achieved by a focus on sustainable consumption compared to a focus on sustainable production. The requirement for more dialogue and joint working between local authorities and others who can work on the consumption end of the supply chain with producers who work at the supply end also needs highlighting.

#### **4. A NEW WASTE STRATEGY**

- 4.1 Chapter 2 of the consultation document sets out the long term trends within which policy formulation is required, identifies the new challenges that need to be faced and the outcomes that should be delivered by 2025.
- 4.2 Modelling has identified that the increasingly stringent limits placed on local authorities in terms of landfilling biodegradable municipal waste and the accompanying landfill allowance trading scheme (LATS) is the main pressure on local authorities. It is predicted that this pressure will drive national household waste recycling rates above current targets. However, DEFRA's analysis has concluded that this outcome requires major acceleration in materials reclamation facility (MRF) and composting infrastructure and includes development of mechanical and biological treatment (MBT) of residual wastes.

- 4.3 Alongside increased recycling rates, the modelling indicates an increased requirement for residual waste treatment, including energy from waste (EfW), including refuse-derived fuels and incineration of post-recycling residues in order to meet LATS targets. EfW is predicted to increase from the current 9% of municipal solid waste (MSW) treated to around 25% depending on waste growth and recycling rates achieved. The greatest requirement is at high rates of waste growth.
- 4.4 On the basis of the data and modelling, the consultation paper predicts that over the next 10 to 15 years total household waste is likely to grow by 1.5% a year nationally (taking account of a predicted population growth of 0.5% per year). On the non-household side commercial and industrial waste (both trade waste collected by local authorities as part of the municipal waste stream and non-municipal commercial and industrial waste), is also likely to grow, driven almost entirely by a growth in commercial waste arisings which are anticipated to increase by 52% by 2020 (from a 2002 baseline).
- 4.5 Chapter 2 of the consultation document outlines a need for greater linkages between waste and other government policies and also better linkage between different waste streams. This, the document concludes has been a clear message from recent consultations. The lack of integration between municipal and other waste streams it is suggested is caused by:
- Strong focus on landfill directive targets
  - No comparable instrument to LATS which drives action on non-municipal waste
  - A lack of targets for non-municipal waste in *WS 2000* beyond 2005.

As the emphasis shifts from waste management towards waste prevention it is suggested that it is likely to be more difficult to distinguish between different waste streams.

- 4.6 The consultation paper makes a number of proposals:
- That higher household recycling and composting targets are set for 2010 and 2015 (40% and 45% respectively) and that a new target of 50% is introduced for 2020. It is the Government's view that in order to achieve LATS targets, local authorities will collectively need to reach these much higher recycling and composting targets. The proposed new targets are shown in the table below.
  - The Government does not consider that there is sufficient information or evidence on which to base a single prevention target for single major categories of waste, but proposes that action on waste prevention is targeted at specific sectors.
  - That energy recovery is unlikely to account for more than 27% of municipal waste by 2020 and therefore that municipal waste recovery

targets of 53%, 67% and 75% are set respectively for 2010, 2015 and 2020.

- Finally, the consultation paper proposes that future landfill targets are set for commercial and industrial waste in order to send a clear signal to commercial markets on the scale of disposal activities envisaged.

<b>Proposed recycling and recovery targets for household and municipal waste</b>			
	<b>2010</b>	<b>2015</b>	<b>2020</b>
National household recycling and composting	40%	45%	50%
National municipal waste recovery*	53%	67%	75%
Per authority minimum targets for household recycling and composting**	25%	30%	

\* Recovery includes recycling, composting and energy recovery.

\*\* An alternative proposal to setting minimum performance standards per authority is to make special arrangements in two-tier county areas with jointly agreed targets between the different tiers, but no indication is given in the consultation document regarding what these jointly agreed targets might be.

Source: Defra Partial Regulatory Impact Assessment accompanying the Consultation Document on the Review of England's Waste Strategy, February 2006

As a comparison, the targets in the North London Joint Waste Strategy are:  
35% recycling and composting by 2010  
45% recycling and composting by 2015 and ongoing to 2020

4.7 This means that if adopted and applied evenly to all Regions and waste disposal authorities, the new national targets would require further effort in North London within the next four years in particular to reach these higher levels of recycling and composting. Similarly the 2020 targets at the 'end' of the period would create additional pressure in these latter years of the North London Joint Waste Strategy. If actioned these higher targets would add to the costs of the Authority and Constituent Borough Councils, but at this stage it is not possible to calculate what these increased costs might be. These potentially revised national targets would also impact on our current review of the procurement options for achieving the North London Joint Waste Strategy

4.8 The principles of the Authority's response to the questions posed in this chapter would be:

- Support for ongoing increases in recycling and composting targets as outlined in the Authority's response to the Government's consultation on recycling and composting targets (See Authority report on the same, December 2005). However, concern about the 'leap' in household recycling and composting required by 2010 relative to current targets. Given the relatively short timescales proposed for these increases the response will consider the potential impact on the planning system of a rush to build new recycling and composting

systems and the achievability of the earlier (2010) proposed targets in the light of the above and the additional pressure towards the 'end' of the strategy period (up to 2020) too.

- The continuation of local statutory performance standards that have regard to local circumstances, but which collectively achieve national targets and obligations.
- Not supporting the proposal for landfill targets for commercial and industrial waste on the basis that increases in landfill tax and producer responsibility measures should drive diversion without the need for additional targets and regulations.

## 5. THE POLICY FRAMEWORK

5.1 Chapter 3 of the consultation document considers the need to have the right framework of compatible policy instruments to achieve the desired outcomes through changing the behaviour of all concerned. The key proposals in this chapter include:

- Simplifying the regulatory system through reforms to the permitting and exemption systems, better guidance and communication and risk based enforcement.
- Extending producer responsibility in a range of sectors and seeking voluntary agreement with possible regulation to follow if the voluntary approach does not deliver the desired outcomes.
- Keeping the pricing framework under review.
- Continuing support from public expenditure for local authorities, for BREW (Business Resource Efficiency and Waste) programme, the Waste and Resources Action Programme (WRAP) and the DEFRA Waste Implementation Programme (WIP).
- Helping behaviour changes by business and the public through information, advice and awareness raising.
- Greater government leadership by example in the management of public sector waste and product procurement policies.
- Strategies and programmes to improve the evidence base.

5.2 The principles to be followed in the Authority response include:

- Support for laws, regulations and regulatory guidance to be timely and unambiguous, particularly in the early stages of transposing European directives into UK law.
- The need to keep the effectiveness of financial measures under review as a mechanism for changing behaviour, but support for extended producer responsibility requirements to result in private sector investment in local authority systems such as packaging collection schemes for example.

## **6. WASTE PREVENTION AND SUSTAINABLE CONSUMPTION & PRODUCTION (SCP)**

6.1 Waste prevention stands at the top of the waste hierarchy, but the consultation document acknowledges that only limited progress has been made in decoupling waste generation from economic growth. The consultation document therefore recognises a need to tackle this as part of the SCP agenda and proposes further action on:

- Prioritising action on products where waste impacts need to be tackled.
- Extending product stewardship by producers and retailers and reducing waste impacts through eco-design.
- Promoting re-use and remanufacture with support from the BREW programme.
- Further engaging businesses (particularly SMEs) to stimulate resource efficiency through advice services.
- Advice to the public on the environmental impact of products.

6.2 The consultation document asks a series of questions in this chapter about product policy, how best to target support for waste prevention and the role of local authorities, Business Links and others in encouraging small businesses in particular to be more resource efficient and to be more proactive on waste prevention.

6.3 The key aspects of the Authority's proposed response are:

- That more could be done to provide waste related information about products placed on the market for example including a product/packaging ratio on all or certain categories of product (similar to price/kg information).
- That more could be done to encourage increased re-use and re-manufacture for example virgin products taxation and/or adaptation of the producer responsibility packaging waste regulations to encourage greater re-use and remanufacture.
- A recognition that engaging SMEs in waste prevention and resource efficiency does require sustained and continued support.

## **7. RECOVERING RESOURCES FROM WASTE**

7.1 For the waste that is produced, the consultation document recognises the need to recover more resources from this material in a more integrated approach. The consultation document suggests that in order to secure the necessary infrastructure investment required to 'close the resources loop', that the following are needed:

- Future targets for local authorities on reducing and recycling household waste.

- Piloting more recycling services for small businesses.
- Encouraging energy recovery within strict limits as alternatives to landfill where recycling or composting is not practical or sensible.
- Placing further restrictions on the use of landfill in the longer term.
- Strengthening central and regional coordination and advice on procurement to help local authorities make the investment needed.
- Continuing support to develop markets for recycled materials including further standards for such materials which will allow lighter regulation.
- A new management plan for waste imports and exports.
- Arrangements for better collection and management of household hazardous waste.

7.2 The consultation document requests feedback on a wide range of issues in this chapter, including feedback on setting future recycling and composting targets for local authorities and the need to set **minimum** performance standards for individual authorities on the same: a minimum of 25% in 2010 is suggested and 30% in 2015. (Whilst some authorities would be set standards at the minimum level, others would be required to achieve beyond the minimum, as at present, to reach the national recycling and composting levels outlined in paragraph 4.6) The document also requests feedback on EfW technologies, waste procurement and recycled materials markets.

7.3 The main principles of the Authority's suggested response include:

- Support for setting future recycling and composting targets as outlined in the Authority's previous response to a consultation on the same in December 2005.
- A comment regarding the varying levels of composting and recycling within an area whether that be an area such as the Authority area, a county or region and therefore the need to recognise the difference between authorities in their ability to achieve higher levels of recycling and composting through local statutory performance standards.
- A comment to note the need to secure and assess outlets for MBT and RDF output when considering these technologies as alternatives to incineration and when considering the extent of their relative benefit in relation to landfill.
- A caveat on the use of landfill as a 'home of last resort' in all situations; particularly in remote locations and/or where the markets for biodegradable elements of the waste stream remain unclear, landfill may and will still be needed.
- And in relation to a couple of questions about the export of recyclables and development of domestic markets for recycle, a response which highlights the need for domestic capacity to be able to compete with overseas markets. The Authority's suggested response will also note that more frequent inspections and increased fines for non-compliance will be the best method of discouraging illegal exports of refuse at the expense of legal exports of recycle.

## **8. ROLES AND RESPONSIBILITIES**

- 8.1 To deliver the changes required, as well as ensuring greater integration between the different strands of waste policy, it is recognised in the consultation document that this is a more complex task which requires an appropriate institutional framework of roles and responsibilities.
- 8.2 The consultation document proposes the following changes in the above for a new Waste Strategy 2006:
- The establishment of a Sustainable Waste Programme Board with cross government membership and external advice to drive delivery of the strategy.
  - Strengthening the role of the Regional Development Agencies (RDAs) to co-ordinate waste and resource management at a regional level in partnership with local authorities and the private and not-for-profit sectors.
  - A wider strategic role for local authorities (in partnerships) to facilitate more integrated management of different waste streams.
  - Improving the interaction of producers and compliance organisations with local authorities to deliver on both EU and national targets.
  - Helping the voluntary and community sector to make its contribution.
- 8.3 The Authority response will:
- Recommend increased representation from the local authority sector, via the LGA, on the Sustainable Waste Programme Board, plus further representation from business and industry, i.e. not just restricting the membership of the Programme Board to government officials.
  - Support greater emphasis on partnership working between local authorities at the regional and sub-regional level on waste management and procurement.
  - Consider the proposed wider strategic role for local authorities in relation to business waste and particularly comment on the need for greater integration of producer responsibility schemes and local authority services.

## **9. WASTE CRIME**

- 9.1 Chapter 7 of the consultation document recognises the potential for a significant increase in waste crime as legitimate waste management becomes more complex and expensive. This chapter poses just a couple of questions about additional action needed to achieve effective enforcement or to prevent waste crime and asks about any evidence which might show a link between the types and quality of local waste collection services and general cleanliness to levels of fly tipping and also asks what changes can be made to service provision to reduce fly tipping.

9.2 As the Authority is not a waste collection authority the response will simply make a couple of general comments about the need for more regular inspections and larger fines for those acting illegally.

## **10. RECOMMENDATIONS**

10.1 Members are recommended to approved the principles of the Authority's response as already outlined, and as summarised at Appendix 1.

10.2 Members are also recommended to delegate authority to the Head of Waste Strategy & Contracts, in consultation with the Chair, to prepare and submit a full response to the consultation based upon the principles outlined in this report.

## **11. COMMENTS OF THE FINANCIAL ADVISER**

The Financial Adviser has been consulted in the preparation of this report and his comments are included in the report.

## **12. COMMENTS OF THE LEGAL ADVISER**

The Legal Adviser has reviewed this paper and has no comments to make.

### **Local Government Act 1972 – Access to information**

#### **Documents and Websites used:**

A Review of England's Waste Strategy, A Consultation Document, DEFRA, February 2006

Review of England's Waste Strategy, Environmental Report under the "SEA" Directive, DEFRA/Enviros/Scott Wilson/Mark Hannon, February 2006

Review of England's Waste Strategy – Non-Technical Summary of Environmental Report, DEFRA, February 2006

Partial Regulatory Impact Assessment of the Review of England's Waste Strategy, DEFRA, February 2006

The UK Government Sustainable Development Strategy, Securing the future, March 2005

**Contact Officer:**

Andrew Lappage  
Head of Waste Strategy & Contracts

Barbara Herridge  
Policy and Development Manager  
Unit 169, Block 1B  
Lee Valley Technopark, Ashley Road  
N17 9LN

Tel: 020 8489 5730  
Fax: 020 8365 0254  
E-mail: [post@nlondon-waste.gov.uk](mailto:post@nlondon-waste.gov.uk)  
London N17 9LN

## **APPENDIX 1.**

### **PRINCIPLES OF THE AUTHORITY'S RESPONSE TO *REVIEW OF ENGLAND'S WASTE STRATEGY: A CONSULTATION DOCUMENT*, FEBRUARY 2006**

#### **Chapter 1.**

The principles of the Authority's response to the question posed in this chapter would be:

- General support for the overall approach of the new waste strategy, but a request for further clarification regarding the interface between business and local government in relation to implementing the strategy and reaching targets. In particular it is recommended that the Authority questions the relative impact that can be achieved by a focus on sustainable consumption compared to a focus on sustainable production. The requirement for more dialogue and joint working between local authorities and others who can work on the consumption end of the supply chain with producers who work at the supply end also needs highlighting.

#### **Chapter 2.**

The principles of the Authority's response to the questions posed in this chapter would be:

- Support for ongoing increases in recycling and composting targets as outlined in the Authority's response to the Government's consultation on recycling and composting targets (See Authority report on the same, December 2005). However, concern about the 'leap' in household recycling and composting required by 2010 relative to current targets. Given the relatively short timescales proposed for these increases the response will consider the potential impact on the planning system of a rush to build new recycling and composting systems and the achievability of the earlier (2010) proposed targets in the light of the above, and the additional pressure towards the 'end' of the strategy period (up to 2020) too.
- The continuation of local statutory performance standards that have regard to local circumstances, but which collectively achieve national targets and obligations.
- Not supporting the proposal for landfill targets for commercial and industrial waste on the basis that increases in landfill tax and producer responsibility measures should drive diversion without the need for additional targets and regulations.

### **Chapter 3.**

The principles to be followed in the Authority response include:

- Support for regulatory guidance to be timely and unambiguous, particularly in the early stages of transforming European directives into UK regulations and accompanying advice.
- The need to keep the effectiveness of financial measures under review as a mechanism for changing behaviour, but support for extended producer responsibility requirements to result in private sector investment in local authority systems such as packaging collection schemes for example.

### **Chapter 4.**

The key aspects of the Authority's proposed response are:

- That more could be done to provide waste related information about products placed on the market for example including a product/packaging ratio on all or certain categories of product (similar to price/kg information).
- That more could be done to encourage increased re-use and re-manufacture for example virgin products taxation and/or adaptation of the producer responsibility packaging waste regulations to encourage greater re-use and remanufacture.
- A recognition that engaging SMEs in waste prevention and resource efficiency does require sustained and continued support.

### **Chapter 5.**

The main principles of the Authority's suggested response include:

- Support for setting future recycling and composting targets as outlined in the Authority's previous response to a consultation on the same in December 2005.
- A comment regarding the varying levels of composting and recycling within an area such as the Authority area and therefore the need to recognise the difference between authorities in their ability to achieve higher levels of recycling and composting through local statutory performance standards.
- A comment to note the need to secure and assess outlets for MBT and RDF output when considering these technologies as alternatives to incineration and when considering the extent of their relative benefit in relation to landfill.

- A caveat on the use of landfill as a 'home of last resort' in all situations; particularly in remote locations and/or where the markets for biodegradable elements of the waste stream remain unclear, landfill may and will still be needed.
- And in relation to a couple of questions about the export of recyclables and development of domestic markets for recycle, a response which highlights the need for domestic capacity to be able to compete with overseas markets. The Authority's suggested response will also note that more frequent inspections and increased fines for non-compliance will be the best method of discouraging illegal exports of refuse at the expense of legal exports of recycle.

## **Chapter 6.**

On roles and responsibilities the Authority response will:

- Recommend increased representation from the local authority sector, via the LGA, on the Sustainable Waste Programme Board, plus further representation from business and industry, i.e. not just restricting the membership of the Programme Board to government officials.
- Support greater emphasis on partnership working between local authorities at the regional and sub-regional level on waste management and procurement.
- Consider the proposed wider strategic role for local authorities in relation to business waste and particularly comment on the need for greater integration of producer responsibility schemes and local authority services.

## **Chapter 7.**

In relation to waste crime as the Authority is not a collection authority the response will simply make a couple of general comments about the need for more regular inspections and larger fines for those acting illegally.

**Report Ends**