

Agenda Item No:

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

JOINT WASTE STRATEGY UPDATE

REPORT OF:

HEAD OF WASTE STRATEGY AND CONTRACTS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

28th JUNE 2006

SUMMARY OF REPORT:

This report updates members on progress made since the last meeting, regarding the implementation of the North London Joint Waste Strategy.

RECOMMENDATIONS

The Authority is recommended to:

- (i) approve the provision of £8,812.50 (£7,500 plus VAT) to WEN/ Real Nappies for London as a contribution towards a final piece of research into the most effective and financially efficient methods for encouraging the use of real nappies and delegate authority to the Head of Waste Strategy & Contracts, in consultation with the Chair, to consider and approve any revised proposal from WEN if it is unable to raise sufficient funds from elsewhere to cover their full initial scope of work;
- (ii) approve a payment of £10,000 to the London Community Recycling Network towards the costs of a Community Compost Support Co-ordinator to carry out a range of tasks to promote and encourage more community composting in North London including the management of the £25,000 North London Community Composting Fund.
- (iii) note that both the above payments are to be made from the Authority's 'other recycling' budget.
- (iv) consider and approve the draft response to LondonWaste Ltd. regarding their proposals to build a Materials Recycling Facility at the Edmonton EcoPark.

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

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Date:

1. BACKGROUND AND MAYORAL REVIEW

- 1.1 The 'Mayor's Draft' North London Joint Waste Strategy (NLJWS) September 2004, provides the framework for progress towards reducing, re-using and recovering a greater proportion of the municipal waste which is generated in the North London Waste Authority area and reducing the amount which is sent for disposal to landfill.
- 1.2 The Authority and its Partners have undertaken a Best Practicable Environmental Option analysis for North London. The preferred option involves working in partnership as local authorities and with local communities to provide the services and facilities required to make the improvements needed at the most efficient scale of operation and finance. The preferred option involves action and investment in waste minimisation, recycling and composting and recovering energy from waste.
- 1.3 As reported at the last meeting the London Mayor had requested confirmation on the precise status of the London Borough of Barnet's position on the North London Joint Waste Strategy before commencing his review of the Strategy. This confirmation has now been received and the formal consideration of the NLJWS by the Mayor has now started. As approved at the Authority meeting on 27th September 2004, the Head of Waste Strategy and Contracts has delegated authority, "to make minor alterations in response to any comments received from the London Mayor." This will be done in consultation with the Chair.
- 1.4 Prior to any Mayoral amendments and in the meantime, the Partner Authorities have agreed to implement the actions contained in the 'Mayor's Draft' NLJWS. The following report outlines progress on the same and is organised according to the relevant chapters in the NLJWS – chapters three to eight.

2.0 STATUTORY REQUIREMENTS

Review of England's Waste Strategy

- 2.1 A formal response from the Authority was submitted for the review of England's Waste Strategy, on the basis of the principles agreed at the last Authority meeting and in consultation with the Chair and Councillors Haley and Stops. A copy of the Authority response is included in Appendix 1.

Default Levying Arrangements

- 2.2 The move to a tonnage based levy as the default mechanism by which the Constituent Boroughs pay for the Authority's services commenced from 1st April 2006. The legislation means the new system is being phased in over a three year period. Legislation that removed the Authority's statutory duty to pay recycling credits direct to the Boroughs in respect of waste which was retained by the Boroughs for recycling is effective from 1st April 2006.
- 2.3 The Authority has introduced a voluntary local recycling credit scheme to pay recycling disposal credits to the constituent borough councils that will be phased out as the Authority moves to a tonnage-based levy over the three years.
- 2.4 Following the publication of "Guidance on the Recycling Credit Scheme" issued by the Department for Environment, Food and Rural Affairs (Defra), in April 2006, the Authority is also reviewing its payments of recycling disposal credits to third parties. Paragraph 3.15 of this report refers.

Joint Waste Development Plan Document

- 2.5 The Constituent Boroughs continue to work together to prepare a Joint Waste Development Plan Document (JWDPD) for North London. This will create the shared land-use planning framework for all wastes (municipal, commercial, industrial, construction and demolition) in North London into the future.
- 2.6 The position of Programme Manager, who will lead this work and take it forward on behalf of all seven boroughs, has now been offered by the London Borough of Camden, subject to all boroughs agreeing the Memorandum of Understanding.
- 2.7 All the constituent borough councils have made a commitment to take part in the JWDPD. The Memorandum of Understanding has been drawn up in conjunction with all seven boroughs. It sets out arrangements for project management, decision making, dispute resolution and budgets. The Memorandum of Understanding is now awaiting ratification by all boroughs through their own decision making processes. Members are reminded of the need for their Borough to ratify the Memorandum of Understanding as this sets the ground rules for the Boroughs in carrying forward the JWDPD.

- 2.8 Since the previous Authority meeting, the consultants appointed to advise on the scope of the JWDPD and accompanying Community Involvement Strategy have completed another report. This additional report, paid for with additional Defra WIP (Waste Implementation Programme) funding of £17,000 provides 'Guidance for Borough Local Development Frameworks'. It offers guidance to the constituent borough councils on waste policies for inclusion in borough core strategies and in development control policies in local development frameworks.
- 2.9 The next stage in the plan-making process is to let the contract for consultants to produce the JWDPD. The advertisement required by EU law is planned to be published in Official Journal of the European Union in the week commencing 19th June 2006. The process of preparing and producing the JWDPD is likely to take three years to complete. It will include a considerable amount of stakeholder consultation. The scope of the contract to carry out the work is currently being finalised, with contract award anticipated in the autumn.
- 2.10 Under the Memorandum of Understanding, a Planning Members Group will also be constituted of cabinet members with planning responsibility. This group will meet separately from the (North London Joint Waste) Strategy Implementation Board because the JWDPD is being progressed by the boroughs as planning authorities. The NLWA is a key stakeholder in the plan but the planning authorities also need to consider the views of other stakeholders such as residents and businesses in their areas.
- 2.11 The consultation period for submitting written responses to the draft alterations to the London Plan (London's spatial development strategy) has recently closed. All seven North London boroughs as planning authorities submitted a written response, as did the Authority. (Agenda Item 11, Authority meeting 8th February 2006). The draft alterations will now be subject to public scrutiny and oral evidence sessions via an Examination in Public Panel on waste are scheduled for 19th to 26th June, (with two additional sessions on 'Omissions for the Draft Alterations' and 'Minerals' on 27th June.) The North London Joint Waste Planning Group has been invited to give evidence, as have the other London joint waste planning groups. The North London JWDPD Acting Programme Manager with support from the Authority's Policy and Development Manager will be representing the North London authorities and giving oral evidence. Full details of all the Examination in Public sessions and written responses etc. can be found at
<http://www.london.gov.uk/london-plan-eip>.
- 2.12 As part of a series of familiarisation visits by the Examination in Public Panel Authority officers arranged tours of the Edmonton incinerator and Compost Centre on 7th April and the Hornsey Street transfer station, recycling and education centres on 15th May for them.

- 2.13 A key issue for the Authority resulting from the Examination in Public is anticipated to be a discussion of proposed criteria by which waste from the central London boroughs is allocated to other London boroughs. This is because the sub-regional boundaries within the London Plan to which borough planners are working are different from the sub-regional boundaries for waste disposal to which borough waste officers and the Authority are working. There needs to be a notional apportionment of central London waste to individual boroughs within sub-regions so that boroughs, coming together in different groupings, are clear how much waste they need to plan for. Without this borough planners cannot establish how to comply with the London Plan and provide a framework for the implementation of the NLJWS.

3.0 WASTE HIERARCHY OPTIONS

Waste Prevention and Reduction – Waste Prevention Plan

- 3.1 It was agreed at the Strategy Implementation Board meeting on 20th March to produce a North London waste prevention plan. Guidance was provided by the Strategy Implementation Board regarding content and priorities for the same, based upon the strategic objectives in the NLJWS, and the Strategy Implementation Board suggested that, of the implementation actions included in the NLJWS, the following would have most impact at a borough level:
- Lobbying government to do more
 - Sharing good practice and considering the effects of waste reduction when introducing new services
 - Providing a concerted and on-going promotional campaign to encourage home composting, including provision of subsidised bins.
- 3.2 The Strategy Implementation Board also concluded that the second and third implementation actions in the list above were the easiest to implement.
- 3.3 In terms of who should take responsibility for implementing the different waste prevention actions included in the NLJWS the Strategy Implementation Board concluded that the Authority was best placed to act on seeking funding or regional support for a packaging waste prevention campaign with local businesses, and other waste reduction campaigns across North London as well as supporting best practice and actively supporting appropriate community composting projects through support for external bids, direct funding and payment of third party recycling credits.

- 3.4 The Strategy Implementation Board considered that boroughs were best placed to act upon the following strategic objectives in the North London joint Municipal Waste Management Strategy: giving support for waste minimisation clubs with business, encouraging community sector and other partnerships to deliver effective re-use services and similarly supporting best practice.
- 3.5 A meeting of borough officers is scheduled for 6th July to discuss this further. It is intended then that the draft plan will then be produced for discussion and approval at the September Authority meeting.

Waste Prevention and Reduction – Real Nappy Research

- 3.6 Apart from home and community composting, another area in which activity is already taking place across North London, is the promotion of 'real' nappies. Uptake of real nappies is incentivised via a one-off payment of £54.15 to parents who can prove that they have purchased real nappies as opposed to disposables. The real nappy subsidy is paid for by the Authority and promoted by the constituent borough councils.
- 3.7 Pertinent to the North London subsidy a pan-London research project is also underway to assess the most effective and cost effective method of promoting and encouraging real nappy uptake. The work is being carried out on behalf of Real Nappies for London (RNfL), a pan-London programme of promotion and research aimed at reducing disposable nappy waste going to landfill. RNfL is run by the Womens' Environmental Network (WEN).
- 3.8 And, according to WEN, whilst there have been many trials of Real Nappy schemes in the UK few have had effective built-in monitoring and evaluation and there have been no comparative studies of different schemes or of the relative effectiveness of different approaches to real nappy promotion which this research aims to assess.
- 3.9 The work is being carried out in four phases, the majority of which is now complete:
- Phase 1:** was completed over the first quarter of 2005-06 and established a baseline attitudinal survey against which to assess the effectiveness of the pilot schemes, providing insights into understanding barriers to real nappy use. This phase involved street surveys and interviews in hospital ante-natal clinics in the boroughs of Bexley, Islington and Lewisham – this last providing the control borough where no scheme has been run during the research period. A phase 1 report presents generalised findings which can be used as a baseline for other areas.

Phases 2 and 3: the effectiveness of three schemes – a *nappy voucher*, *cashback* and *giveaway* – is being assessed in six pilot boroughs (each scheme running in two boroughs – *Bexley*, *Hackney*, *Hounslow*, *Islington*, *Lambeth* and *Richmond* with *Lewisham* acting as a control borough). A range of factors are being evaluated, including take up, continuation and experience along with demographics. Phase 2 analysis was completed in March 2006 using self-completion questionnaires. Phase 3 involves a computer assisted telephone interview survey of participants for a higher response rate and high quality data.

Phase 4: a follow-up random sampling survey is planned in all 6 boroughs operating pilot schemes and the control borough, *Lewisham*, ie in 7 boroughs in total. This will assess the effectiveness of practical scheme along with their promotional programmes at influencing a shift in attitudes and behaviours in the general population compared to any national promotion affecting the control borough. There is a funding shortfall for this phase, which the Authority has been approached to support.

- 3.10 The initial findings of the research suggest that ‘cashback’ subsidies such as that which is offered in North London, may not be the most effective way of promoting and encouraging real nappy uptake. Publicity and local promotions seem to be important. Potentially the Authority may wish to reconsider its real nappy subsidy in the light of this work once it is complete. However, without robust information to back up such initial conclusions both the Authority and others do not have the information base for reviewing and updating relevant policies and therefore officers are recommending that the Authority provides some funding to enable this final stage of the work to be completed.
- 3.11 The rationale for requesting funding is that:
- 3.11.1 The research will benefit the Authority in deciding the most cost effective method for continuing to encourage the use of real nappies, fitting in with Best Value requirements to challenge why and how services are provided the way they are and compare performance against others.
 - 3.11.2 Phases 1 to 3 of the project are complete and phase 4 for which funding is being sought is ready to be implemented so the results will be available and useful by the Autumn, enabling the Authority to budget effectively for 2007-08.
 - 3.11.3 If the Authority does not provide funding then it is unlikely that we will be able to act upon the initial conclusions of the work to date as they are not statistically robust.

3.11.4 West London Waste Authority, which has two of its boroughs involved in the project has already provided over £16,000 in funding, and Western Riverside through the Western Riverside Environment Fund has also provided financial assistance of £15,000. The boroughs involved have also already provided support whilst the Authority has not provided any finance for the project to date although two of the North London constituent borough councils are taking part in the research.

3.11.5 The project represents good value for money with the initial phases of research already paid for.

3.12 WEN is seeking a contribution to the final research stage from the Authority and requested a sum of £11,000. Officers recommend that the Authority provides £8,812.50 to WEN (£7,500 plus the VAT which WEN cannot recover as they are not VAT registered) as a contribution towards the final piece of work. This is calculated as approximately 7/33 (7 boroughs out of 33 in London) of the total costs of the final phase of the research as quoted by the market research company, NOP. If WEN is unable to raise sufficient additional funds elsewhere, the Head of Waste Strategy and Contracts will consider if any revised proposal still offers good value for money to the Authority. The proposed cost can be met from the Authority's 2006/07 'other recycling' budget.

3.13 To date, the work has been funded as follows:

Grant funding primarily for promotion, but including a small contribution to the research work

London Recycling Fund	£151,000
Community Recycling and Economic Development Fund (CRED)	£118,000
Western Riverside Environment Fund (WREF)	£15,000

For research phases 1 to 3 (inclusive of VAT):

Bexley	£11,750
GLA	£3,525
Hackney	£3,525
Hounslow	£1,175
Islington	£6,525
Lambeth	£3,525
West London Waste Authority	£16,390

3.14 Finally, progress is being made on the appointment of a Waste Prevention Officer, a new position agreed at the Authority meeting in July 2004. This post holder will report to the Policy and Development Manager. The position will be advertised shortly.

Waste Prevention and Reduction - Recycling and Re-use Credits

- 3.15 In April 2006 the Department for Environment, Food and Rural Affairs (Defra) introduced new regulations and issued new guidance on the payment of recycling and reuse credits by waste disposal authorities. This guidance affects the manner in which the Authority pays recycling credits and is currently being reviewed by officers. Initial observations are that Defra is encouraging third party claims for credit from the community sector and expects waste disposal authorities to receive these claims favourably and pay wherever possible. There is a new requirement for the Authority to establish and maintain a register of approved collectors and reprocessors so that the payment of credits can be streamlined. A full report on the effect of the regulations and guidance and recommendations for policy will be presented to Members at the next Authority meeting.

North London Integrated Compost Project

In-vessel composting facility

- 3.16 Following the official opening of the Compost Centre commissioned by the Authority at the LondonWaste EcoPark in March, two public open days took place on 8th and 9th May in celebration of Compost Awareness Week. The days were organised by LondonWaste with additional support and attendance from the Composting Association, London Community Recycling Network and the Authority. All constituent borough councils also ran their own activities during the week to encourage more home and community composting and additional participation in organic collection services.
- 3.17 Tonnages of kerbside collected green and organic kitchen waste being delivered into the Centre from borough organic collection services to date are currently annualised at 75% of the predicted amount (for the period November 2005 to May 2006), a total of 13,100 tonnes for the seven months compared to the predicted tonnage of 17,500. However, once seasonally adjusted, this apparent shortfall is removed, and may even be reversed. The early shortfall has been filled with re-use and recycling centre green waste transferred by London Waste from the bulky waste facility at Edmonton to the Compost Centre. The re-use and recycling centre green waste would otherwise have been sent off-site to an open-windrow composting facility which can process the material at a lower cost compared to the 'in-vessel' Compost Centre operating to food-grade standard.

- 3.18 Over the next few months Authority and borough officers will work together on tonnages from kerbside services in order to ensure that the Compost Centre is utilised to the maximum for kerbside collected material when assessed over 12 months.
- 3.19 The Compost Centre received State Veterinary Service approval in April 2006. The compost can now be applied to agricultural land with the restriction that pasture land cannot be grazed or cropped for feed stuff use within two months (for pigs) and three weeks (for other farmed animals) after application. The material is expected to meet the BSI Publicly Available Specification (PAS) 100 and is considered suitable for 'general landscaping purposes'. Certification for BSI PAS 100 standard takes some six months from the analysis of the first loads of finished product. It will give confidence to end-users and will make it easier to place the compost on the market. The compost product is now available free-of-charge to Borough parks and green spaces departments. Whilst the local use of the material saves on transport and placement costs and is therefore the preferred option in terms of Best Value, local demand is unlikely to ever match supply from the Centre so alternative and more remote outlets will continue to be needed.
- 3.20 A trial has also been undertaken with biodegradable bags submitted by London Borough of Islington. These were submitted for testing in the Compost Centre at LondonWaste Edmonton and appear to have fully biodegraded. On that basis LondonWaste Ltd. has confirmed that it is happy to accept these bags from schools in Islington. At the moment there is a reluctance to accept other brands of bags than those which were used in the trial or to accept bags from a wider catchment area as there are still concerns regarding the risks of elevated contamination levels. LondonWaste Ltd. has also agreed to test other brands of biodegradable bags which boroughs are interested in using. Contamination levels at the Compost Centre continue to be monitored on a regular basis, with feedback to relevant boroughs where necessary.
- 3.21 In addition to the above LondonWaste's other parent company, SITA UK, supplied 40 litre bags of compost material made from a number of different sources of kitchen and garden waste (including LondonWaste material) to the Authority for review. These bags are now being offered to boroughs for sale at re-use and recycling centres. Camden and Hackney have already taken some bags of material for resale and it is hoped that other boroughs might follow suit shortly. From a communication perspective, the sale of bags allows the constituent borough councils an opportunity to show 'closed loop' processing through the sale of composted material made from 'waste' and is a good endorsement for composting and the quality of the product which can further encourage more people to take part. The level of uptake will provide a test for whether there is a business case for a bagging plant locally.

Home and Community composting

- 3.22 As outlined at the last Authority meeting, because the funding from the London Recycling Fund for the North London Integrated Compost project came to an end on 31st March 2006 and has now been spent, the constituent boroughs have agreed their own support packages for **home composting** this year. In some cases boroughs have contracted the London Community Recycling network to provide additional support for officers with volunteer training and advice to residents; in other cases boroughs are in receipt of separate funding and support from the national Waste and Resources Action Programme to promote the increased uptake of home composting.
- 3.23 However, in addition to the above, and as part of the commitment to matching the **community composting** element of the London Recycling Fund grant awarded between 2004 and 2006, the Authority is committed to providing a further one year of funding for community composting projects during 2006-2007. Authority report Agenda Item 7, 28th April 2004, paragraph 4.5 and Authority report Agenda Item 11, 19th October 2005, paragraph 2.8 refer. This support amounts to a grant fund of £25,000 to which existing and new community composting projects within the seven constituent borough councils can apply.
- 3.24 The North London Community Compost Fund was launched in 2004-2005 and supported £25,000 worth of community composting projects across North London, paid for by the London Recycling Fund. It is now time for the Authority to fund a subsequent year of support as already committed and outlined above.
- 3.25 However, whilst the London Recycling Fund paid for the management of the 2006-2007 North London Community Compost Fund and promotion of community composting until March 2006, it is now necessary to pay for this fund management and additional promotion of community composting from existing Authority resources.
- 3.26 It is proposed that this community composting fund is managed as in 2005-2006 by the London Community Recycling Network who can provide a Community Compost Support Co-ordinator for North London. This part-time role would ensure continuation of last year's community compost network services and would specifically provide the following support:
- Act as a day to day point of contact for potential, new and existing community composting groups.
 - Provide funding and technical advice, (including helping groups to use Authority funding to lever in additional financial support from elsewhere); signposting to other sources of information and basic support services to groups. This is a continuation of an existing London Recycling Fund grant funded service.

- Train and provide support to community compost groups, providing up-to-date information and advice including composting practice, legislation and partnership opportunities. This will include the delivery of at least 1 training event for community composting staff and volunteers.
- Identify knowledge & expertise gaps in community compost groups, boards and management committees and using London CRN's networks and other projects to fill them. This will include the delivery of 1 training event by the end of March 2007 for management level staff and boards of management.
- Maintaining and developing a local community compost network for North London.
- Promote the North London community composting fund, provide advice to potential applicants and alongside Authority officers, review applications and making grant awards to ensure that the £25,000 is spent appropriately by the end of March 2007.
- The Community Compost Support Co-ordinator would also be responsible for administering the North London Community Composting Fund; for carrying out all the necessary grant administration, along with fiscal performance and target reporting to the Authority. This element will include the production of timely returns and reports.

3.27 The Authority is recommended to approve a payment of £10,000 to the London Community Recycling Network to support the costs of a Community Compost Support Co-ordinator to carry out the tasks outlined above including the management of the £25,000 community composting fund.

3.28 It is proposed that the money for the co-ordinator is paid to London Community Recycling Network rather than to any other organisation or by providing the service within the Authority because:

- London CRN successfully provided the administrative support for the North London Community Composting Fund in 2005-2006 so has established, and now know and understand the system.
- London CRN has good links with the community waste sector within London so will have good access to potential applicants and a good understanding of their needs. They act as the main representative body in this area.
- London CRN has a person in post who could carry out the work who has both the necessary expertise and knowledge to deliver the programme within a timely and cost effective manner.

- 3.29 Whilst the Authority is shortly to appoint a Waste Prevention Officer who could carry out this work, the position is unlikely to be filled until September, given interview and notice periods, and the person will also take some time to be inducted. This means that work would not start until the person was appointed which would mean a delay such that the commitment to the London Recycling Fund to match fund their £25,000 may not otherwise be honoured in 2006-07. Secondly, the person appointed may not have specialist (community) composting expertise or legislative knowledge, which applicants need and which London CRN can provide.
- 3.30 The proposed additional cost of £10,000 can also be funded from the Authority's 2006/07 'other recycling' budget.

4 MANAGEMENT OF OTHER WASTE STREAMS

- 4.1 The Consultation on the English Waste Strategy has now closed and included information and proposals for commercial and industrial waste. A review is also underway by the Greater London Authority (GLA), which will inform the development of a 'wider waste' strategy for London, the timetable for consultation with the Assembly on which is anticipated to be autumn 2006.
- 4.2 The Authority has submitted a response to the consultation on the English Waste Strategy, following the principles outlined and approved at the last Authority meeting and incorporating Member comments at the same and in consultation with the Chair and councillors Stops and Haley. A copy of the Authority response is attached in Appendix 1.

5 IDENTIFYING THE BEST PRACTICABLE ENVIRONMENTAL OPTION FOR NORTH LONDON

Waste Data

- 5.1 The Authority's retained environmental consultancy firm, AEA Technology plc, was commissioned, as approved at the Authority meeting on 7th December 2005 to assist borough officers in preparing waste data predictions to assist with the Authority's facility procurement planning. The report from AEA Technology plc showed a gap between their predictions and the projections being used in current plans.
- 5.2 The predictions have now been reviewed by the separate consultants appointed to advise the Authority's procurement options. The result of this review is expected to be reported at the September Authority meeting as part of the procurement report.

6.0 IMPLEMENTING THE BEST PRACTICABLE ENVIRONMENTAL OPTION FOR NORTH LONDON

Waste Disposal Implications - Update on the Hornsey Street Transfer Station Redevelopment.

- 6.1 Since the last Authority meeting, the process of resolving the disputed items and outstanding snags at the Hornsey Street Waste Transfer Station has progressed in a positive manner.
- 6.2 The arbitration process to resolve disputed items involving the appointed Independent Engineer (IE) and the end-users (London Borough of Islington, ICSL, NLWA and LondonWaste Ltd.) and the designers and construction engineers (AYH and SRM) who have been providing assistance to the IE to enable him to rule on disputed items has now been concluded. The result is that the IE has now made decisions on the outstanding 125 disputed items reported at the last meeting.
- 6.3 On some of the items the IE has ruled in favour of the end users, including the Authority, in other cases against the end users. However, included in the above are the four most significant issues affecting the Authority on which the IE has ruled in favour of the end users:
 1. Fire detection system
 2. Air handling system
 3. Lighting levels in the tipping hall
 4. Design of the compactors
- 6.4 The next stage in the process is to agree how the necessary remedial works will be carried. The aim is to have agreed an action plan before 15th July when the contract to build the stadium is expected to be complete.

Waste Disposal Implications – Materials Recycling Facilities

- 6.5 Proposals for a Materials Recycling Facility (MRF) at the LondonWaste Ltd. EcoPark at Edmonton are being prepared by LondonWaste Ltd. Prior to the submission of a planning application LondonWaste has been advised of the need to carry out a community consultation exercise by the London Borough of Enfield planning department. The main part of this exercise involves dropping an information leaflet through the (36,000) letterboxes of all residents and businesses within one and a half miles of the EcoPark. This is taking place over a two-week period starting 12th June. Leaflets are also being distributed via community events and borough libraries.

- 6.6 LondonWaste has also been advised to send information to and invite comments from key stakeholders such as the Authority. The aim of the consultation exercise is to take local and other stakeholder views into consideration in developing an application and the planning department will expect to see the results of this exercise when reviewing the application. Upon receipt of the planning application, Enfield will also organise its own consultation process as part of the normal process of considering a planning application.
- 6.7 Whilst LondonWaste receives comments directly from the Authority through representation on the MRF Steering Committee, the Authority has also received a copy of the information leaflet through the community and stakeholder consultation process. A draft response is included in Appendix 2 which Members are asked to consider and approve.
- 6.8 The consultants appointed to advise on the procurement process to ensure the provision of services by the Authority post 2014, when the existing 'main waste disposal contract' with LondonWaste comes to an end, have also been advised of LondonWaste's proposals.
- 6.9 The deadline for a response is Friday 30th June, and a draft is attached for approval at Appendix 2.

Transport Implications – Rail Transfer

- 6.10 The Authority's Hendon Rail Transfer Station is within the Cricklewood and Brent Cross Regeneration Area. The London Borough of Barnet and the development agencies involved in the regeneration are proposing to relocate the Authority's rail transfer station to a new, purpose-built waste facility elsewhere within the regeneration area. A further meeting has taken place with the development agencies and the GLA to consider the various options available. The developers await a response from the GLA as a result of the meeting. More detailed proposals will be forthcoming in the near future for consideration by Members following this feedback and further work by the Authority regarding the options available and Authority needs will be necessary.

7.0 WORKING IN PARTNERSHIP TO DELIVER THE STRATEGY

A Public Awareness and Participation Campaign

- 7.1 The Partner Authorities recognised in the NLJWS that engaging the public effectively to take action will be crucial for the achievement of the Strategy and accordingly committed to an on-going public awareness campaign throughout the period of the Strategy and to undertake to coordinate their respective contributions to this campaign where this will be beneficial.

- 7.2 As agreed at the last Authority meeting (7th April), Members approved the submission of a joint bid to the Waste and Resources Action Programme (WRAP) communication fund (Behavioural Change Local Fund) for further promotional activity with the detail to be agreed by the Head of Waste Strategy and Contracts in consultation with the Chair.
- 7.3 A partnership bid for funding was submitted by the Authority on behalf of five partners: Camden, Hackney, Enfield, Waltham Forest and the Authority by the due date – 28th April. Barnet, Haringey and Islington submitted individual bids for financial support.
- 7.4 The partnership bid was specifically aimed at increasing participation in kerbside recycling in poorly performing areas and came to £444,932 over a two year period. The bid incorporated a community workshop toolkit containing guidance and resources for borough officers in different community languages, some website resources, posters and display banners for community events. The bid also included local advertising and specifically targeted activities such as doorstepping and community workshops (using the resources above) in Enfield and Waltham Forest. Pre and post campaign evaluation and participation surveys were also included as a requirement of the funding.
- 7.5 The published timetable for WRAP's Behavioural Change Local Fund indicated that successful authorities would be informed in June 2006. However, Defra has recently indicated to WRAP that, as a result of Ministerial changes and internal consideration of funding priorities within Defra, funding for this initiative in 2007-08 cannot be confirmed until the end of July.
- 7.6 WRAP will therefore need to defer the announcement of funding until early August. Initial assessment has been completed in accordance with the original timetable, and WRAP will therefore be able to make an announcement as soon as the funding position is clearer.

Commercial and Industrial Partners - Bulking of Dry Recyclable Wastes

- 7.7 Several constituent Borough Councils have asked the Authority to make arrangements with LondonWaste Ltd (LWL) for the receipt, bulking and transportation of commingled dry recyclables to third party materials reclamation facilities (MRFs).
- 7.8 The benefit to the Authority is that it will start to have under its control the feedstock for the first local MRF (rather than this being controlled by separate contracts within its boroughs) for which approval in principle to procure was given by the Authority in April 2005. It also means however that the Authority will take on (indirectly through LWL) the task and risk of securing appropriate MRF capacity elsewhere.

7.9 In financial terms, under the current levying and recycling credit arrangements instead of paying a recycling credit to the relevant boroughs (as the Authority does now), we will pay a gate fee to LWL and will pay the difference, if any, between that gate fee and the avoided recycling credit to the relevant boroughs until such time as the recycling credit payment regime ceases in three year's time. However, given the cost of treatment, it is not anticipated that the Authority will pay any 'residual' recycling credit payments in 2006/2007 as the cost of transport and treatment is likely to exceed the value of the recycling credit payment.

8.0 COMMENTS OF THE FINANCIAL ADVISER

The Financial Adviser has been consulted in the preparation of this report and has no further comments to add.

9.0 COMMENTS OF THE LEGAL ADVISER

9.1 The Legal Adviser has reviewed this report and all comments are contained within the report.

10.0 RECOMMENDATIONS

10.1 The Authority is recommended to:

- (i) approve the provision of £8,812.50 (£7,500 plus VAT) to WEN/ Real Nappies for London as a contribution towards a final piece of research into the most effective and financially efficient methods for encouraging the use of real nappies and delegate authority to the Head of Waste Strategy & Contracts, in consultation with the Chair, to consider and approve any revised proposal from WEN if it is unable to raise sufficient funds from elsewhere to cover their full initial scope of work;
- (ii) approve a payment of £10,000 to the London Community Recycling Network towards the costs of a Community Compost Support Co-ordinator to carry out a range of tasks to promote and encourage more community composting in North London including the management of the £25,000 North London Community Composting Fund.
- (iii) Note that both the above payments to be made from the Authority's 'other recycling' budget.
- (iv) consider and approve the draft response to LondonWaste Ltd. regarding their proposals to build a Materials Recycling Facility at the Edmonton EcoPark.

Local Government Act 1972 – Access to information

Documents used: North London Joint Waste Strategy, Mayor's Draft,
September 2004

Review of England's Waste Strategy A Consultation
Document, February 2006 (Defra)

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Copy of Authority Response to the English Waste Strategy Consultation

Defra Waste Strategy Review
Freepost SEA 12430
Thornton Heath
CR7 7XT

12th May 2006

Dear Sir or Madam,

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

Thank you for providing us with the opportunity to respond to the consultation on the above. NLWA is one of the six joint waste disposal authorities in England. We are responding within the context of having agreed with our constituent boroughs a joint waste strategy with a recycling and composting target of 35% recycling and composting by 2010 and 45% recycling and composting by 2015 and all our boroughs having agreed to prepare a joint waste development plan document.

Whilst we have not responded individually to each question via the online "Dialogue by Design" process, as it was just as easy for us to produce a single response 'report' which we were able to circulate to Members, we have tried to make some response to all questions that were posed, although inevitably our feedback on some questions is more comprehensive than on others.

The main over-arching comments are that:

- The Authority is broadly supportive of the overall approach of the new waste strategy but believes that more could be done to join up public and private sector targets and responsibilities in order to achieve broader sustainability goals.
- The Authority supports a continued rise in recycling and composting targets to the levels outlined in the consultation paper. But the Authority also considers that reduction or waste per capita targets should be set in order to focus attention higher up the waste hierarchy.
- More needs to be done by industry to provide better public information on products in relation to their recyclability, reusability and the ratio of product to packaging produced.

- And government needs to take more of a lead with both fiscal and regulatory measures to curb waste growth, including extending producer responsibility measures to a wider range of products, acting upon the proposals included in the consultation in relation to hazardous waste and recognising that sustained and continued support is required to engage small to medium sized companies in the issues.
- Decisions affecting both the collection and disposal of various waste streams must be taken in a wholly joined-up way.

Officers from the NLWA and the constituent boroughs have discussed the above consultation paper collectively but you will receive a response individually from both tiers of local waste services within our area.

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

A handwritten signature in black ink, reading "Ray Dodds", positioned to the left of a vertical red line.

Cllr Ray Dodds
Chair, North London Waste Authority

**THE NORTH LONDON WASTE DISPOSAL AUTHORITY RESPONSE TO
REVIEW OF ENGLAND'S WASTE STRATEGY: A CONSULTATION DOCUMENT,
FEBRUARY 2006**

Chapter 1.

Question 1: *Please state your views on the overall approach for the revised strategy set out in this document and any other points you wish to make. (You may like to respond to this question once you have considered the rest of the document and the other questions.)*

The Authority is generally supportive of the overall approach for the revised strategy set out in the consultation document.

However, it would be helpful if more specific emphasis was placed upon the role of producers in the generation of waste and accordingly if further clarification could be provided in the revised strategy regarding the interface between business and local government in relation to implementing the strategy and reaching targets, particularly given the proposed link between the Waste Strategy and the Sustainable Consumption and Production (SCP) Strategy and the position of both relative to the UK Sustainability Strategy. As an example, present producer responsibility targets are not comparable to local authority targets either in terms of scope, target deadlines or tonnages, but the two sectors must clearly work together to reach overall sustainability objectives and can contribute to the achievement of the same. The Authority recommends that the revised strategy includes:

1. Some further practical detail regarding the interface between the sectors.
2. Some suggestions regarding how government might encourage this.
3. Some indications regarding movement towards consistency of targets and comparability of approach.

We welcome the Defra work on modeling the impact of lifestyle changes on household waste arisings (being carried out by AEA, The Social Marketing Practice and the Future Foundation), which looks at changing consumption patterns as a predictor for household waste composition and growth. This work is particularly useful as it differentiates between the amount of product waste and packaging waste and will allow predictions for the two streams to be based upon comparable and consistent data sets.

The Authority would also like to see more work on comparing sustainable consumption data to sustainable production information as this would help to put the relative emphasis on sustainable consumption (compared to sustainable production) into context given that the majority of products produce far more waste by weight during their production, than the weight of product which is finally disposed. It is important to take action on both aspects, but the Strategy should draw out the link more between the two. For example, one aluminium can recycled not only helps to save resources in terms of energy and bauxite

extraction, but also helps to reduce the amount of process waste/mining overburden created when the bauxite is mined.

It is noted that the new waste strategy will be closely aligned to the SCP Strategy due to be published in 2006, but the role of local authorities in sustainable consumption and production and particularly the role of statutory waste disposal authorities such as the North London Waste Authority (NLWA) requires clarification within this framework. As Alan Knight, co-Chair of the Sustainable Consumption Roundtable says

“The Government has got to stop relying on information leaflets and hoping for the best - and start working with businesses and NGOs to get practical measures into people’s lives.” - Alan Knight, co-chair of the Roundtable

But, in order to do this, some practical models for joint working need to be developed.

Producer responsibility initiatives go some way towards providing such models by linking producer investment in recycling and reprocessing with local authority collection systems for individual materials. However, in general these are product specific initiatives, do not tackle consumption specifically and do not *require* business and local government to work together.

Finally, we note that there is no mention in the document regarding proposals for a new product body and that a separate consultation was issued in December 2005 on an organisation for sustainable products. This is a proposal which is welcomed by the Authority.

It is important in the final document that references and links between the various strategies are explicit. Perhaps this could be achieved in summary form by a simple table which outlines how different actions contained in one strategy contribute to the objectives and targets in another and the relative contribution that each is expected to make.

If the link between the role of producers and local authorities as the organisations responsible for collecting the waste from consumers can be made more strongly, this will only serve to enhance the achievement of the three key aspects outlined in the foreword to the consultation document, namely:

- producing less waste in the first place
- a more joined-up approach to waste, specifically becoming better integrated in the way we deal with waste treated by local authorities and waste which comes from business
- and finally, securing long-term sustainability through seeing waste as a resource.

Chapter 2.

Recycling and recovery targets

Question 2: *What are your views on proposed national household recycling and composting targets and the level they should be set at?*

The Authority supports ongoing increases in recycling and composting targets as outlined in the Authority's response to the Government's recent consultation on recycling and composting targets (Consultation on 'Options for local authority statutory performance standards on recycling and composting in 2007/08', Defra, October 2005). In order to drive authorities' performance forward and particularly given the weighting that recycling and composting targets have had in terms of their contribution to the comprehensive performance assessment (CPA) targets and the requirement to reach LATS objectives, in the NLWA's view it is important to set further incremental recycling and composting targets for local authorities.

In making any changes to the CPA framework similar emphasis must also be given to waste targets.

The Authority supports the level of household waste recycling and composting proposed for 2015 but is concerned about the proposed 2010 targets from the Authority's own perspective. The latter represent a significant 'leap' compared to current achievements for us. If a national target of 45% household recycling and composting is set for 2015 then an incremental increase would lead to a target of 35% household recycling and composting in 2010, rather than the 40% proposed. Particularly given planning uncertainties, the numbers of new facilities required and the need for further investment to reach significantly higher levels of recycling and composting, the Authority considers that the 2010 target proposed is too challenging for metropolitan areas.

The continuation of local statutory performance standards that have regard to local circumstances, but which collectively achieve national targets and obligations is also required and recognising the potential for some authorities to go beyond a 40% target by 2010 and that others will struggle to get there is also important.

In the light of this the Authority supports the proposed 2015 statutory national target of 45% recycling and composting of household waste. The Authority accepts that the Government may wish to set a 50% target for 2020, but asks the Government to note that it is not yet clear if this level of recycling and composting will be achievable in metropolitan areas such as its own. The Authority considers that the 2010 target should either be non-statutory or revised downwards to 35%. The Authority does not consider that recovery targets for municipal waste are required now (see the response to question 3).

Finally, no proposals are made for targets in relation to "kg household waste collected per head of population" (Best Value Performance Indicator 84a). Any future targets in relation to percentage recycling and composting rates should also be viewed relative to the total amount of waste collected in an area and reference made to this. The Authority would support any proposals to set targets for the amount of waste per head of population as this would also confirm the waste hierarchy, by enabling a focus on waste prevention as well as recycling in order to meet the waste per capita objectives. Targets should be set for the

reduction of waste, but the Government itself needs to do more from the centre to tackle waste growth, particularly packaging waste, by both fiscal and regulatory means.

Question 3: *What are your views on setting municipal waste total recovery targets?*

Regarding the proposal for municipal waste recovery targets, the Authority considers that the legislative framework would be significantly improved if all the targets could be made on a consistent basis – either household or municipal waste, rather than a mix of the two. As the LATS targets are based upon municipal tonnage the Authority would support this being the framework for delivery of both recycling and recovery targets; some consistency is required.

Recovery targets are already in place for packaging waste (60% recovery by 31st December 2008) and for municipal waste, (45% recovery by 2010 and 67% recovery by 2015). The driver of LATS in particular is also resulting in investment in recovery technology.

The Authority considers that the driver of LATS, with its associated fines for non-achievement, is so great that municipal recovery targets are no longer necessary.

It would be helpful if some look-up tables could be provided showing, waste disposal authority by waste disposal authority, the combined recycling and recovery rates needed to achieve LATS targets. These tables could also show what recycling and recovery rates are required to hit targets at differing underlying rates of tonnage growth.

Investment in non-recycling and composting recovery infrastructure is already taking place without higher recovery targets. And there is a danger that recycling and composting targets which don't attract financial penalties could easily be 'lost' in the rush to ensure LATS compliance and therefore result in a disproportionate focus of attention on and investment in solutions lower down the waste hierarchy, such as MBT followed by incineration which divert material from landfill, relative to investment in prevention, recycling or composting infrastructure which in hierarchy terms are the more preferable. The Authority wants to invest in facilities to divert material from landfill such as MBT and thermal treatment of residual waste, as well as in recycling and composting, but the Government should be aware of the potential for mixed messages which result from these different targets and the unintended consequences which may result.

Landfill targets

Question 4: *What are your views on proposed targets for the landfilling of commercial and industrial waste and the level they should be set at?*

The Authority accepts that more focus on commercial and industrial waste is required, given that it is a large part of the total waste stream and also recognises that the amount of commercial waste in particular is anticipated to rise significantly compared to household waste over the forthcoming years.

However, in the Authority's view it is premature to set targets for restricting the amount of landfilling of commercial and industrial waste as there is already one instrument in place in the form of the landfill tax, which is aimed at reducing the amount of commercial and industrial (and municipal) waste going to landfill. Before implying that neither the landfill tax (and also producer responsibility measures) are not working, by introducing additional limits to landfilling commercial and industrial waste the Authority recommends that it would be better to review and adapt the existing fiscal and regulatory framework if necessary.

So, the Authority does not support 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. Although it is recognised that it would be useful to keep these existing mechanisms under review, including both the scope and the level at which the current measures are set.

However, another option which the Authority would support is a limit on biodegradable commercial and industrial waste being sent to landfill. This would both restrict more waste to landfill and level the playing field between council 'trade waste' collection services and the private sector.

Chapter 3.

The regulatory framework

Question 5: *What further specific improvements, if any, would you like to see to the regulatory framework?*

The key aspect, in the Authority's view for further improvements in the regulatory framework is the implementation of regulation. Specifically, the Authority urges Government to ensure that future regulatory guidance is timely and unambiguous, particularly in the early stages of transforming European directives into UK regulations and accompanying advice.

Delays in agreeing the waste acceptance criteria to meet the requirements of the Landfill Directive and the lack of consistency in the transposition and implementation timetable between the hazardous waste and waste electrical and electronics directives, (which should have been introduced at the same time in the UK) are examples where the implementation of the regulatory framework has failed. The cost implications of such delays are significant. For example, the Authority has budgeted £750,000 in 2006-2007 for the cost to the Authority of anticipated further delays in retailers and distributors implementing a take-back scheme for WEEE, (Agenda Item 7, Revenue Budget and Levy 2006/07, North London Waste Authority meeting, 8th February 2006, paragraph 5.9).

Data reporting requirements in order to measure progress towards the achievement of directive targets could also be improved. Authority officers have already made representations regarding difficulties with using the centralised WasteDataFlow system, but for the future, any data and reporting requirements which accompany the implementation of either amended existing or new regulatory frameworks should be given more time to be trialed and pilot tested with all types of users before being implemented in full on a nationwide basis.

Producer responsibility and voluntary action

Question 6: *What scope is there for extending the 'stewardship' or responsibility of producers and retailers for the impacts of the products they manufacture and sell, and which key products or sectors should be explored?*

The integrated product policy (IPP) framework sets an outline for enhanced product stewardship at the producer level and also throughout the whole production, supply and disposal chain. IPP recognises that all products cause environmental degradation in some way, whether from their manufacturing, use or disposal and it seeks to minimise these by looking at all phases of a product's life-cycle and taking action where it is most effective.

The scope for extending the 'stewardship' or responsibility of producers and retailers for the impacts of the products they manufacture and sell, should be seen within the context of IPP and the desired actions that should be taken as a result will vary accordingly.

So, as the life-cycle of a product is often long and complicated and covers all the areas from the extraction of natural resources, through their design, manufacture, assembly, marketing, distribution, sale and use to their eventual disposal as waste it is difficult from an external perspective to identify where best to act and how, for the vast myriad of products available on the market.

At the same time product stewardship is shared and involves many different actors such as designers, industry, marketing people, retailers and consumers.

Given the caveats above, the Authority's response is provided from the position of a statutory waste disposal authority, viewing the opportunities for extending product stewardship within the context of consumers, obtaining best value for the public purse and minimising municipal waste.

Opportunities for product stewardship extension from this perspective and in the Authority's view include:

Extended product stewardship through investment

Opportunities for extending producer responsibility requirements to ensure that producer responsibility includes a requirement for private sector investment in local authority systems such as packaging collection schemes for example. The Authority would support raising producer responsibility targets overall and also raising material specific targets in order to achieve this. The anticipated shortfall in packaging recovery from household waste for example, as noted in the Valpak PackFlow report (July 2005) is a good example where timely liaison between sectors and investment and dialogue between the private and public sectors are needed to achieve the overall aims.

Extended product stewardship through information provision

More prescriptive approaches adopted to consumer information. This could include extending the consumer information obligation (CIO) requirements of the

packaging regulations to require obligated organisations and compliance schemes to make a 'per obligated tonne' financial contribution to the national communication campaign – RecycleNow.

This could also include taking account of packaging:product ratios and requiring producers and retailers to publish a 'kg of product to kg of packaging' ratio on products (similar to the price per kg information supplied on many items). In order to keep this relatively simple, perhaps a voluntary 'traffic light' system with say red = high ratio of packaging to product, amber = medium, green = low could be used or incorporated into the system suggested below.

The Authority welcomes the success of energy use labeling, with a clear standardised system of numbers and coloured bars and suggests that a similar system might be adopted for the waste related impacts of products. Thus an 'A' rated product might perhaps be one which produces minimal waste during its production, is easily recyclable (in practice as well as in theory) or reusable and/or which includes a certain recycled content and/or minimal packaging per amount of product. The Authority response to question 16 provides more detail.

Action to extend product stewardship to merchandising

A further possible extension of product stewardship could be to require producers to pay some 'penalty' for the creation of extra waste associated with producing products purely for merchandising reasons, e.g. giving away a free umbrella, bag or CD with a newspaper, or a free first aid kit for opening a new bank account. This would extend product stewardship to service marketing and short-life products too.

Waste management and disposal

Finally, the legislation exists in the form of the 'duty of care' to ensure that producers of waste are responsible for its ultimate disposal. Extending this legislation up the supply chain to ensure that producers are also responsible for minimising both the amount and hazardousness of waste associated with producing their products and services should be considered, as well as the possibility of extending producer responsibility to a wider range of products such as disposable nappies and free newspapers.

Action beyond producers

But the emphasis should not just be upon producer and retailers, more work could be done to beef up the 'sale of goods' act and consumer knowledge about the importance of 'fitness for purpose' and of products living up to their expectations in terms of length of life/durability. Potentially this could include minimum longevity requirements for certain categories of products or simply ensuring that producers or others provide more advice either directly or via *Environment* or *Consumer Direct* regarding their products.

Question 7: *What are your views on seeking voluntary agreements as an alternative to statutory approaches?*

There is a whole variety of tools that can be used to ensure that producers and retailers are responsible for the environmental impacts of the products they manufacture and sell. These include measures such as economic instruments, substance bans, environmental labeling and product design guidelines. These tools can be voluntary or mandatory.

However, it is the Authority's view that voluntary agreements only really work effectively when there is a threat of regulation if the voluntary approach fails to achieve its aims.

As a minimum, the Authority would like to see mandatory information requirements on products, more prescriptive requirements relating to consumer information and mandatory investment of membership income by packaging and other compliance schemes in local authority and retailer collection, take back and recycling schemes.

The effectiveness of financial measures needs to be kept under review as a mechanism for changing behaviour and this could be a function of a new product body as outlined in the Authority's response to question 14.

An effective pricing framework

Question 8: *How effectively do current prices drive the behaviour of those involved in preventing, producing or managing waste?*

Waste pricing and its impact on those involved in preventing, producing or managing waste is varied and depends upon:

- the nature of the waste (including its hazardousness, method of collection and frequency of the same)
- size and length of contract for its management
- disposal point, including transport to the same
- method of containment and amount of handling
- local commercial decisions
- whether or not the waste is directly charged to the producer
- as well as government imposed price influencers such as landfill tax, fuel duty, producer responsibility compliance costs and environmental monitoring and liability requirements to name but a few.

Given the complexity of elements which make up the ultimate price of waste it is difficult to assess whether and how effectively current prices are driving behaviour in relation to waste. On balance the Authority's view is that:

- The pricing of waste disposal for *large commercial producers* of waste is sufficiently high (as a proportion of turnover) to be making a positive difference to behaviour, encouraging waste reduction in particular. The landfill tax has been most effective on producers of heavy waste such as the construction industry where the £2 rate has been sufficient to divert large quantities of material away from landfill sites into re-use and recycling. It has also challenged waste disposal authorities as they have large quantities of waste to deal with. However, regular reviews of business performance and surveys of the sector should be carried out to ensure that the 'right' pricing signals continue to be sent to large business to ensure that they choose the best environmental option in relation to waste. An increased rate of increase in the landfill tax escalator would be an easy way to send stronger price signals to the market if required.
- In relation to *producer responsibility and packaging waste* in particular, the cost of compliance to date has shown little evidence of changing manufacturing behaviour – rather the cost of compliance is simply seen as another legitimate cost of 'doing business' to be passed on to the consumer. And, there is little incentive for producers to minimise waste when they don't bear the cost of disposal, which is borne by the last user of the product (and even then, it is an indirect cost within the Council Tax for all household waste). There may be more change as the targets increase and extend to other areas of product policy and as the costs of waste disposal and producer responsibility compliance continue to increase. However, the Authority does not believe that this change will occur sufficiently quickly or give sufficient confidence for the financial sector to invest for the long term. The Authority would therefore like to see higher producer responsibility targets being set further into the future to ensure appropriate investment in infrastructure and to ensure that more of the costs are borne by producers, thereby reducing the costs to local tax payers.
- But for *smaller organisations*, often the 'trade waste' customers of a local authority, the relative proportion of waste costs to their overall business, a lack of knowledge of the regulations and overall price sensitivity mean that many by-pass the system, for example taking cardboard from a local shop to the nearest recycling bank to dispose of it for free, rather than pay for a waste disposal or recycling collection service. So, there is a mismatch between the price that some sectors are prepared to pay and the cost of the most environmentally beneficial option. Within this framework we welcome the outcome of the BREW (Business Resource Efficiency and Waste) programme activity aimed at encouraging SMEs (small to medium enterprises) to recycle more and how this might best be achieved. And the work of the NISP (National Industrial Symbiosis Programme) is similarly welcomed. The Authority would be interested to hear about any new measures or information about how best to engage trade waste customers to change their behaviour in respect of waste, so that we can pass this on to our constituent borough councils to assist with Landfill Directive compliance.
- For *consumers* the price signals are not strong so the price of the service does not drive behaviour change or specifically encourage consumers to prevent waste or recycle more. The Government's recent work on

recycling incentives is to be welcomed. Within the NLWA area one of the constituent borough councils is involved in an incentive trial and a further two are trialing compulsory recycling backed up by fines for non separation of waste. The Authority supports any further work in this area.

Question 9: *Are there further tradable allowance (or other) schemes that could be developed to help the market deliver environmental outcomes more efficiently?*

In relation to whether further tradable allowance (or other) schemes should be introduced to deliver environmental outcomes more efficiently the Authority acknowledges that a market-based trading system of permits and allowances is a cost effective and flexible method of ensuring compliance. It is the Authority's view that such a system should be extended as planned into other areas of producer responsibility, such as tyres, WEEE and batteries. Some of the organisations already established to act as either trading floors or compliance schemes are likely to welcome any extension of their remit. The Authority would also like to see stronger enforcement of the existing systems, improved policing to weed out free loaders and isolate inaccurate reporting, plus more prescriptive requirements on how PRN money is invested.

Individuals

Question 10: *Should there be greater effort to encourage waste prevention and minimisation relative to recycling and, if so, how should this be done?*

Yes, greater effort should be made to encourage waste prevention relative to recycling as there is clearly potential to do more and because any overall reduction in waste will in absolute terms make percentage recycling targets easier to achieve (because the total tonnages required to be recycled would be smaller). Work by Enviro (*International waste prevention and reduction practice: Final report*, A report by Enviro Consulting Limited for Defra, October 2004) suggested speculatively that a reduction in household waste arisings of 7 to 8% would seem achievable given committed action on home composting, packaging, unwanted mail and newspapers and nappies alone. The Authority thinks that a 7% reduction is realistic if the measurement and contribution of home composting can be agreed and included and if all the activities mentioned above are also enacted.

A first step to encourage household waste reduction would be to extend the existing Best Value Performance Indicator (BVPI) 84a, (number of kilograms of household waste collected per head of the population) into a series of targets (either statutory or non-statutory). In order to do this, guidance would be required on a common method for assessing the proportion of non-household waste within the municipal stream.

Secondly some clarification should be provided about the definitions of prevention. Within the Authority area the intention is to use the OECD definition also adopted by the National Resource and Waste Forum (NRWF) in its waste prevention toolkit and the Scottish Executive in its recent consultation on a waste

prevention strategy for Scotland. Specifically this defines waste prevention as 'avoidance, reduction and re-use' and waste minimisation as all the former plus recycling and centralised composting, i.e. minimising the amount of waste going to landfill. So asking if more should be done 'to encourage waste prevention and minimisation relative to recycling' does not make sense using the above definitions. Clarity should be provided within the new strategy.

Thirdly, research work being carried out currently under the Defra R&D programme into waste prevention and measuring the same is welcomed as a basis for further investment in this area and the current SCP projects funded through the Environmental Action Fund should also provide some information on the best practical ways of encouraging prevention from the consumer 'end' and what the next steps should be.

There are a number of reports available which can also guide next steps, such as the NRW Waste Prevention Toolkit, a recent report carried out for the GLA by London Remade, looking at the waste prevention activities of the London boroughs, the draft Scottish Waste Prevention strategy and WIP funded waste prevention strategies for individual local authorities, such as a recent report for the London Borough of Barnet. Additionally there is European-wide information available for use to guide next steps such as the work of the environmental NGO Espace Environnement in Belgium which is producing a toolkit of best practice across Europe, similar to the work that Enviro carried out for Defra. The Interreg funded ChangeLAB project and the recent report by the Sustainable Consumption Roundtable "*I will if you will*", (Sustainable Development Commission and National Consumer Council, May 2006) are also welcome in this regard. So there is considerable scope to develop both a supply side and consumer side framework for action, based upon existing reports and information.

A waste prevention strategy should be drafted for England, including next steps and be issued for consultation. This should include a review of the waste prevention work being carried out by WRAP with producers and a review of work being undertaken by local authorities on the demand side. A stakeholder dialogue session undertaken for the former Strategy Unit review of Waste Strategy 2000 was focused on prevention and could be easily repeated or updated to help decide next steps. As the cost of waste disposal and recycling increases, waste prevention will become more attractive, but it will also need more impetus from government to make it happen.

Business

Questions 11: *How can businesses be engaged in their capacity as purchasers and providers of services?*

Businesses will buy or provide services on the basis of their fitness for purpose and cost effectiveness/sales potential, not on their green credentials. In order for businesses to be more engaged they need to be aware of the business benefits of buying or selling 'green' goods and/or services, or alternatively to be forced in some way to be engaged as purchasers and providers of services to reduce and

recycle more. Encouragements such as lowering VAT on products made from recycled material can also help.

The success of the Mayor's Green Procurement Code in London provides a good model which could be replicated in other regions or at a national level. Local authorities as well as businesses represent significant purchasing power and both businesses and local authorities could be encouraged to include minimum recycled content targets within their purchasing plans e.g. a target to buy 50% recycled products for example. Any extension of green procurement codes could have a similar effect.

Government leadership by example

Question 12: *What more can the Government do to provide an example in its own waste management and product procurement policies to reduce waste and waste impacts?*

Product procurement

The UK Sustainability Strategy 'Securing the Future' concludes that UK Government buys £13 billion worth of goods and services each year and that for the wider public sector this figure is £125 billion (Source: *The UK Government Sustainable Development Strategy, March 2005*). As such, the potential impact of Government in providing an example in its own waste management and product procurement policies to reduce waste and waste impacts is significant.

The report identifies that both in the EU and internationally, there is growing pressure on governments to make better use of their purchasing power in this way to deliver their policy goals.

The UK Sustainability Strategy also identifies a set of actions for Government in order to achieve the objective of being recognized as amongst the leaders in sustainable procurement across EU member states by 2009. These actions provide a good list. The Authority would like to see progress against these actions published on an annual basis, but it is probably premature to consider new actions when the existing list has only recently been identified.

Waste management

In terms of what more can be done by Government to provide an example in its own waste management to reduce waste and waste impacts, some publicity regarding what Government is doing would be useful. The Government website for sustainable development at:

<http://www.sustainable-development.gov.uk/government/department/index.htm>

which lists what each central government department is doing to become more sustainable is an excellent resource as it contains central government departments' policies and action plans but it needs to include more examples of progress and actions to reduce waste and waste impacts. Government activity needs to be more visible to a wider audience to gain more profile and inspire others to act.

The Authority recommends that the Sustainable Development Commission (SDC), in its new role as formal 'watchdog' of Government's progress on sustainable development from 1st April 2006, should be the critical friend and sounding board, suggesting further actions and improvements for government on

an ongoing basis. Jonathan Porritt's interpretation of this role, as Chairman of the SDC specifically states that one of the SDC's new roles will be:

"To monitor UK Government Departments as they seek to embed sustainable development in both policy-making and departmental management (sustainable procurement etc), and to comment on the adequacy of funding for sustainable development within each department."

At a local level the Government should consider how to incorporate green procurement and waste management practices within the CPA (Comprehensive Performance Assessment) regime and how to facilitate closed loop recycling. The development of the 2012 Olympics and Paralympic Games provides an opportunity for London and the rest of the country to showcase best practice in both green procurement and waste management best practice for which the London Mayor and partners should be given every assistance.

The Authority also supports action on the following recommendations identified in the Biffaward Sustainable Resource Programme report (*Adding value to public services: Analysis of public sector resource use, Waste Watch, 2003*):

- That a group of public sector 'pioneers' is established to assist in the identification of products and services that improve resource productivity, particularly for government, on the basis that part of the difficulty in successfully delivering improved resource productivity relates to the perception that green products and services are more costly or have poorer performance records.
- That a local authority initiative is established to mirror the framework for action on sustainability for central government as set out in the UK Sustainability Strategy.
- That this initiative incorporates harmonised targets and a standardised reporting structure,(across government departments) including third party verification of the reports to show what government is doing on waste management and product procurement policies to reduce waste and waste impacts (alongside other measures). The Waste Watch research report suggests that reporting on performance can be a powerful tool for increasing an organisation's capacity for resource use data management and is a strong motivation for improvement.

Evidence for development of future policies

Question 13: *What are the information gaps requiring waste management-related research in the short and long-term?*

Defra's R&D strategy outlines next steps for research to fill information gaps in the short term. Work was also carried out by FORWARD (Forum for Waste and Resources Research and Development) a number of year's ago and outlined in a report entitled '*A Framework for prioritising waste and resources R&D*', (Golder Associates 2002) and subsequently by the Waste and Resources Research Advisory Group (WRRAG) to identify information and research gaps which would need to be filled as a result of forthcoming legislative developments. These gaps

were identified in the short term in the case of FORWARD and more broadly by WRRAG in order to develop the Defra R&D strategy.

It is recommended that the approach used by FORWARD and the work which was carried out in order to develop the Defra R&D strategy is simply updated and that a new Defra R&D strategy is produced as a result. The legislative driven approach to prioritising information gaps, identifying areas in which the evidence base needs more input plus extensive stakeholder consultation on the draft R&D strategy worked well before and we see no reason to adopt a different approach now – the work simply needs to be continued and updated.

Chapter 4.

Prioritisation for effective policy intervention

Question 14: *What products and materials do you consider should be priorities for action to reduce waste and waste impacts?*

For the purposes of focusing the activities of a new product body, the Government's own product body consultation (*Consultation on an organisation for sustainable products, Defra, December 2005*), suggests a focus on three 'clusters' of products namely: food and drink products, construction and energy-using products within buildings and personal transport. These product clusters having been selected on the basis that they are considered to be items with a disproportionate impact on the environment across their life cycle, i.e. 'priority products', a categorisation which in turn is linked to the integrated product policy framework. However, this consultation document also suggests that there is a choice to be made between intervention and information provided across a broad (and perhaps shallower) scope of products and product sectors, with the Advisory Committee on Consumer Products and the Environment (ACCPE) recommending these include food, tourism, construction and transport or a 'narrow and deep scope' rather like the existing Market Transformation Programme (MTP).

The Authority has not responded to the consultation on an organisation for sustainable products, but supports the suggestion that a product body should be formed. In its first phase it should be a 'thinking' Body which would explore the shape that a subsequent delivery Body might take – its role and remit. Then, in its second phase a delivery Body should be established to focus on the specific challenges, developing and driving policy responses to bring about measurable product improvements.

The Authority recommends that the new Product Body proposed by Government is best placed to consider the products and materials which should be priorities for action, not only to reduce waste and the waste impacts of products, but also to take into account the wider environmental framework of integrated product policy, lifecycle analysis. The Authority also considers that this Product Body is best placed to review the effectiveness of existing product policy interventions and future EU requirements such as the framework Directive on the eco-design of Energy-using Products (EuP).

However, the effectiveness of this Body will depend upon it being provided with the right resources, expertise and remit.

From the 'end-of-pipe' perspective of a statutory joint waste disposal authority, the key priorities for action would be those product groups which:

- make a significant contribution to making progress towards a low carbon economy, particularly biodegradable waste due to the impact on greenhouse gas emissions at the point of disposal
- are likely to grow most as a percentage of the waste stream; Defra's recent work on modeling the impact of lifestyle changes on household waste arisings (AEA, the Social Marketing Practice and the Future Foundation) gives some pointers to these groups for household waste alone
- those product groups which already are or are shortly to be the subject of EU legislation which will impact upon them e.g. energy-using products
- those product groups which either can or could easily be made from a high proportion of recycled material – i.e. products which will drive the supply chain for recycling

However, the Authority also recognises that these products which from a waste perspective are seen as priorities may not be the priority products from an overall lifecycle approach, looking at the environmental impact during their production, use and disposal. A whole life assessment is required within this context before priorities for action can be agreed. Trade-offs may need to be made between priorities for waste compared to priorities for energy use for example and it is the Authority's view that a new product body is best placed to make these recommendations.

Question 15: *What is the scope for reducing waste and achieving more efficient resource use at the product design phase?*

The scope for reducing waste and achieving more efficient resource use at the product design phase is significant, but this is not an area of internal expertise for the Authority. WRAP's work with product owners and the work of the Market Transformation Programme are already looking into more efficient resource use and the Authority's response to question 14 discusses the role of the proposed new Product Body.

However, the proposals for a new Sustainable Design Forum as outlined in the UK Government Sustainable Development Strategy should also be tasked with tackling this area, particularly as further input would be useful to provide design support including, linking innovation funding and investment more closely into design which minimises environmental impact, including waste.

The O2 sustainable design network at www.o2.org which is an international network on sustainable design along with the Centre for Sustainable Design at Surrey University www.cfsd.org.uk and the Centre for Sustainable Consumption at Sheffield Hallam University which also runs the EPSRC Research Network on Product Life Spans <http://www.shu.ac.uk/research/csc> for example, are also much better placed to answer questions of this nature.

Question 16: *What is the scope for improving the amount of waste-related information provided about products placed on the market?*

As outlined in the Authority's response to question 6, the Authority considers that there is considerable scope for improving the amount of waste-related information provided about products placed on the market. This could be by adopting more prescriptive approaches to consumer information, including extending the consumer information obligation (CIO) requirements of the packaging regulations to:

- Require more take-back and recycling information on products.
- Require producers to publish 'kg of product to kg of packaging' ratios on products, taking account of recent work on packaging:product ratios (similar to the price per kg information supplied on many items).
- Require producers to state how they have tried to minimise waste in the production of products and require them to provide benchmarking information on the same. Although this level of information might not fit on the products themselves it could be a requirement for companies to have this information included in literature, or on websites or through telephone support lines for consumers who call.

The Authority welcomes advances on energy use labeling, with a clear standardised system of numbers and coloured bars and suggests that a similar system might be adopted for the waste related impacts of products. Thus an 'A' rated product might perhaps be one which produces minimal waste during its production, is easily recyclable or reusable and/or which includes a certain recycled content and/or minimal packaging per amount of product. The local Ecotag project in Ontario adopts a similar approach:

- Best packaging for products using minimal or no packaging or reusable packaging;
- Recommended recyclable for products where a single layer of packaging is used and the product* can be recycled locally
- Earth preserver for products that contain no hazardous materials

* The information states that the product can be recycled locally, but it could equally be for items where both the product and packaging can be recycled locally.

In Belgium in the Walloon region, retailer signposting through the use of 'shelf talkers' also highlights the location of minimally packaged or highly recyclable products on supermarket shelves – although no distinction or prioritisation is made between the products with highly recyclable packaging and those which are refillable or use a minimal amount.

Finally, in addition to the above, the proposals for Environment Direct should encompass a more proactive approach to providing waste related information about a range of products placed on the market.

Product and resource re-use

Question 17: *What are your views on how re-use and re-manufacture could be stimulated further?*

There are a number of mechanisms, fiscal, regulatory and voluntary which could be used to encourage a greater amount of re-use and re-manufacture. These range from requiring certain categories of product for example to be designed for re-use and re-manufacture to support for organisations such as London Remade and the Furniture Re-use Network to provide additional advice to manufactures and collectors on re-manufacturing and re-use.

Regulatory or financial intervention is likely to take some time to implement and the evidence base required to prove re-use can be complex, so that investing in re-use can be difficult on a practical level.

However, other countries have introduced a range of measures, such as the Dutch government's packaging covenants, one of which requires producers and importers to refill 90% of bottles over one litre and to recover for re-use or recycling 75% of other bottles. Eleven US states also have a legal deposit on bottles and cans for beer and soft drinks and six states also have deposits on mineral water containers according to Enviro's work for Defra. The Authority would support a requirement on producers and importers to refill and re-use bottles in line with the Dutch requirements, deposits might be a consequent market-based response to such requirements.

The government's recent response to the consultation on recycling and re-use credits makes it clear that whilst third party re-use and recycling credits are discretionary that re-use is not regarded by Government, simply as deferred disposal. However, in order to invest public money in re-use and remanufacturing schemes at a local level it is important to have clear protocols agreed for measurement and payments based on the same.

Some further practical guidance for local authorities on the payment of re-use credits would be welcome.

Expanding the scope of the national 'RecycleNow' campaign to encompass re-use and re-manufacture would also be helpful so that these activities were promoted at a national level. It would also be helpful to allow local authorities to bid to WRAP for communication funding to promote re-use. Re-use and repair guides, tool share schemes and second hand and hire shops can all be promoted at a local and national level to good effect. Local authorities could also include targets for re-use and repair within their procurement goals for purchasing recycled products (see the Authority response to question 11).

From the perspective of 'wider wastes' the engagement of businesses in waste exchanges is a helpful approach, but in our experience to be successful this requires on-the-ground outreach workers, hard copy lists of 'wastes' available for re-use or re-manufacture and regular visits to companies to encourage them to participate. A simple web-based listing of 'waste' available for re-use will not be extensively used without this additional support. The NISP programme is a good start at a national level to providing a consistent network, but is likely to require

continued consistent support and investment of resources at local, regional and national levels and we would question whether this is likely to be the case.

Ultimately business will only invest in re-use and re-manufacture if it makes economic sense to do so. Examples of companies making a financial case for investing in re-use and re-manufacture include Xerox copiers, toner cartridges provided by a range of companies and second hand car dealers. (Today for example, 90% of Xerox-designed equipment is re-manufacturable. Source: Xerox Corporation, Environment, Health and Safety 2000 Progress Report). A piece of research which looked at the opportunities for re-use and re-manufacture, which explored the businesses which are doing it already and consumer and procurement professionals' views towards re-used and re-manufactured products would be a useful place to start for considering what more could be done to stimulate this area of activity still further.

And an initial early intervention would also be to provide incentives for manufacturers producing products which lasted longer or for consumers who were happy to retain products beyond a certain period – like a loyalty bonus but for product loyalty and longevity of use which could be rewarded as part of a take-back scheme.

Finally, some recognition of the opportunities to credit re-use and re-manufacture and count this tonnage towards some statutory targets would also be welcome.

Engaging business to improve resource efficiency

Question 18: *What are the best ways of stimulating business action on resource efficiency, including waste prevention?*

The EU Thematic Strategy on the prevention and recycling of waste (*Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of waste, Brussels, 21st December 2005*), identifies that the potential for waste prevention (and resource efficiency) depends upon a number of factors – economic growth, the extent to which economic operators have already adopted best practice in reducing waste etc. The strategy also recognises that prevention can only be achieved by influencing practical decisions taken at various stages of the product life cycle: how a product is designed, manufactured, made available to the consumer and finally used. It also recognises that the production of municipal waste is also affected by consumer behaviour which is related to the social structure, personal income and societal wealth.

Within such a complex environment, there is not a single way of best stimulating business action on resource efficiency including waste prevention. The EU Thematic Strategy states that waste prevention targets should not be prescribed because they are not the most effective or eco-efficient way to foster prevention because they fail to address the complexity of environmental impact: the weight of waste could be reduced yet the environmental impact could increase, whereas small weight reductions can bring large reductions in environmental impact. In the Authority's view however, as outlined in the response to question 2, it would be useful to set kg of waste per head targets in order to ensure that waste prevention is being tackled and to enable progress on recycling to be benchmarked against the overall amount of waste being produced. The strategy

also suggests that intervention needs to be made at a number of levels and states an intention to amend The Waste Framework Directive to clarify the obligation for Member States to develop publicly available waste prevention programmes, within the context of SCP.

There are therefore no simple answers to deciding on the best methods for government to stimulate resource efficiency including waste prevention within business in general. However, the regulatory approach is likely to be the most forceful and possible suggestions include:

- Introducing additional producer responsibility legislation on the manufacturers, distributors and sellers of disposable products, although this could be difficult in practice for reasons highlighted in the Scottish Executive's consultation on a waste prevention strategy for Scotland (paragraph 2.17, *Preventing Household Waste in Scotland, A Consultation Paper*, January 2006) or some other adaptation of the producer responsibility legislation to stimulate greater resource efficiency.
- A levy on disposable products, with the proceeds preferably going to waste disposal authorities.
- Virgin products taxation to encourage increased re-use and re-manufacture.

Encouraging SME's to reduce waste

Question 19: *How can resource efficiency, including waste prevention, be stimulated among SME's in a way which does not incur disproportionate costs?*

For SMEs, improving resource productivity primarily involves continued concerted effort at a local level to encourage greater resource productivity and improved waste prevention.

In the past a number of the North London Waste Authority boroughs supported the Waste Watch Business Network a network of environmental business clubs which included activity on waste prevention and re-use, (as well as energy and water). However, as a result of changes to the landfill tax credit scheme this network ceased. The work of the newly launched National Industrial Symbiosis Programme (NISP) is similar, but we have to date only been to one initial meeting of NISP. The North London Joint Waste Strategy sets an objective to 'actively support' Business Networks as part of the overall approach to waste prevention, so the Authority is keen to engage with this programme and then to develop targets and methods to evaluate the cost effectiveness of the work in terms of cost per tonne diverted from disposal.

From the above experience the Authority concludes that a range of activities are required for businesses to reduce waste and encourage re-use and that on-line activities and advice such as on-line waste exchanges also need the support of hard-copy lists of available resources and development workers to ensure that their full potential is maximized. This type of support does not come cheap.

Question 20: *What role should Business Links, local authorities or other organisations play in engaging small businesses?*

The role of Business Links, local authorities or others in engaging SMEs in the resource efficiency agenda needs to be flexible. In some regions and areas, not-for-profit organisations such as Groundwork might be best placed to talk to SMEs perhaps because they have operated in the area for a long time. Similarly Chambers of Commerce or local business or trade fora might also be useful.

Engaging with SMEs is notoriously difficult because the staff are so time poor, but key to their engagement is ongoing support and dialogue with people they trust. Government must recognize that the support needs may be intensive (hand holding and working alongside the companies, rather than directing them to a website) and talking in a language and at times which suit local SMEs. Engaging SMEs in waste prevention and resource efficiency does require sustained and continued support.

Finally, the community and voluntary (including social enterprise) sector is frequently missed out in any initiatives aimed at SMEs. Relevant sized community and voluntary sector (CVS) organisations should be included, albeit that their drivers and structures may be different.

Extending the sectoral approach: producer responsibility

Question 21: *What are your views on developing a sectoral approach to waste prevention including setting waste reduction targets?*

A sectoral approach to waste prevention as defined in the consultation document refers to 'industry' sectors – such as construction, grocery retail and chemical industries. However it also refers to wider industry groups such as industries regulated by the Environment Agency for which the EA is proposing to set a reduction in waste disposal target of 15% for the period 2006 to 2011.

The Scottish waste prevention strategy consultation similarly takes a sectoral approach but focuses on a different range of 'sectors': product designers and manufacturers, retailers, consumers, communities and local authorities.

A sectoral approach to waste prevention seems logical, makes the problem manageable and allows a focus on those sectors with the greatest impact and/or potential for improvement. It also allows the sector(s) to be targeted relatively easily via trade associations through which voluntary agreements can be negotiated if applicable and it enables targets and plans to be agreed within a framework which is meaningful for the given industry sector, tying in with the timing of other legislation affecting that sector for example or technological developments which may be resulting in less or more waste.

The Authority therefore supports a sectoral approach to waste prevention, including the establishment of targets, but recommends that government needs to provide leadership in terms of the sector groupings which will be used. With both WRAP and the EA already taking different approaches to these groups it is critical that the government ensures some consistency of approach including prioritisation of sectors for action and decisions on whether voluntary or mandatory targets should be set.

Question 22: *How do we best engage consumers to reduce waste?*

Engaging consumers to reduce waste can be carried out in a number of ways. The NRW Waste Prevention Toolkit provides a full list of options for engagement, examples of activities that have been used elsewhere and suggested priorities for action based upon the potential reduction in the waste stream that particular actions would achieve.

The work by Enviros for Defra provides a series of similar examples of engagement with consumers that have been used at both a local, national and regional level.

The Authority recommends that government uses these suggested actions to engage consumers to reduce waste at a national level.

Specific activities at a national level to engage consumers more strongly could include tax breaks for re-usable products, more information through the national RecycleNow campaign and/or taxation on disposable items such as carrier bags.

At a regional and local level in North London the constituent borough councils and the Authority will be preparing a strategy for action. We have already used the GLA waste prevention survey previously mentioned to collate information on existing activities in North London and already have a coordinated approach across North London on engaging consumers with home and community composting and real nappies (two of the actions which the NRW Waste Prevention Toolkit suggests could lead to a 1.5% to 4% reduction in household waste) and are looking to use a future plan to develop next steps for action.

Chapter 5.

Local authority performance

Question 23: *Should we set future statutory performance standards for Local Authorities related to recycling and composting household waste and how far ahead should any future targets be?*

Yes, future statutory performance standards should be set as outlined in the Authority's response to the Government's consultation on the same.

In that consultation we suggested that future targets should be set in order to drive authorities' performance forward and particularly given the weighting that recycling and composting targets had in terms of their contribution to the comprehensive performance assessment (CPA) targets. In the NLWA's view it would be a retrograde step not to set any further recycling and composting targets for local authorities and for these not to be part of future appraisals of local authorities' performance. This is because waste collection authorities' performance is critical to waste disposal authorities' success in achieving Landfill Directive compliance. In addition to this authorities have already made or started to make investments in order to reach progressively higher targets and some authorities, including the NLWA, have set targets which are higher than those required under the statutory obligations.

Future targets should be set up to complement the UK's obligations under the Landfill Directive, with certainty (to further encourage investment, whether from the private sector, compliance schemes or local authority funds) of annual targets from now until 2020.

It needs to be recognised however that the cost of reaching targets and the ability to reach them will vary from authority to authority. There are 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 and the flexibility to allow for variability is useful. However, the perception of residents seeing very different levels of recycling service for example in adjacent areas also suggests that minimum standards are also required to ensure resident satisfaction and some standardisation of approach.

Question 24: *What are your views on the possible changes to the design of the standards suggested above?*

Alternative approaches that the Government should include in its consideration of options within the consultation paper are including within the waste collection authority targets a minimum composting element and/or allowing waste disposal authorities to pass down the costs of LATS purchases or penalties to those waste collection authorities that fail to divert their share of the waste disposal authority's obligation.

The Authority also supports the suggestion that it would be useful to set a reduction standard which is linked to the proportion or amount of waste that is not recycled. But the Authority also believes that it is important to measure and set targets for the total quantity of 'waste' produced as this sends the clearest message of all about the need to consume more sustainably and allows residents, particularly those living in areas with on-board weighing systems to get feedback on a continuous basis about the amount of waste they are producing and to benchmark this against, regional, national and international norms.

Question 25: *What are your views on the possible changes to how standards should apply to local authorities suggested above?*

Regarding the application of new standards the Authority supports setting minimum performance standards, but without an additional incentive to go beyond the minimum we question how above minimum standards would be achieved and how public spending to go beyond the standards could be justified. What incentive in a de-minimus environment is there for the potential high fliers to do more?

The other key issue is that it is the Authority's understanding that those authorities who have invested to reach their recycling and composting targets can count associated cost savings towards their Gershon efficiency savings – as long as that investment and resultant savings help the authority to meet its statutory recycling targets. However, any investment which may now lead to the authority over-achieving in terms of recycling and composting targets cannot be counted as Gershon savings. The net effect is that if targets are stabilised at a minimum level the potential for Gershon savings to be realised is reduced. Whilst this might more appropriately be considered under a review of Gershon savings, it is a point worth noting here.

In the Authority's previous response to the consultation on the recycling and composting targets we also agreed with the proposal to increase the minimum recycling rate from 18 to 20%, although we did not agree that the higher targets proposed should be capped.

The Authority recognises, particularly for inner city authorities with high proportions of transient and other difficult to reach groups, that the 20% target is challenging when faced with other service issues and needs. However, whilst there are such issues and there have been late and slow starters, all our constituent borough councils have agreed to the North London Joint Waste Strategy targets which work progressively towards a 35% rate in 2010 and 45% in 2015.

Regarding the second option for changes to standards application to allow for special arrangements to be made for pooling in two tier county areas, the Authority supports the approach to pooling of targets but would like to see this as a possible option in statutory joint waste disposal authority areas too. Even if it is not used, such an option increases flexibility and allows groups of authorities to select the most expeditious approach towards the achievement of overall targets.

Impact on the management of waste further up the hierarchy

Question 26: *Do you have any comments on the proposal to encourage the diversion of wastes from landfill to Energy from Waste?*

The Authority supports the concept of the waste hierarchy and that energy-from-waste (whether proven incineration technologies or emerging alternative technologies) is a more preferable option to landfill. The focus of attention should be upon diverting waste from the 'bottom' end of the hierarchy, i.e. landfill; to solutions at the top end, i.e. avoidance, reduction and re-use. However, the Authority recognises the need to provide for residual waste treatment and disposal and for that residual material supports the use of energy-from-waste in preference to landfill disposal, along with the recycling of 'bottom' ash from the plant and the recovery of heat and generation of electricity to maximise efficiencies.

The Authority would also like to see tonnages of ash recycled counting towards recycling targets as they used to at one stage as this encourages further use of ash. However, the Authority recognises that it would not be appropriate for the tonnage 'in' to an energy-from-waste facility to count as 'recovery' and then to

have recycling of ash 'out' of the facility counting towards the recycling target too, i.e. double counting some of the same tonnage towards both recovery and recycling. Guidance would be required to resolve this issue.

Particularly in London where the London Mayor has set a target to be 85% self sufficient by 2020, i.e. to manage 85% of London's waste within its boundaries by 2020, the Authority considers that thermal treatment of residual waste, whether that is MBT/RDF or direct incineration will need to be included.

Question 27: *Of the two main current Energy from Waste technologies – i.e. a) MBT/RDF and b) direct incineration – is there any reason to prefer one over the other), and if so, why?*

The use of MBT processes to produce a refuse derived fuel (RDF) which is subsequently burnt compared to direct incineration of waste both have advantages and disadvantages. The Authority's main concerns about the use of MBT to produce a RDF in particular are that outlets for the fuel material need to be assessed, secured and certain, particularly when considering these technologies as alternatives to incineration and when considering the extent of their relative benefit in relation to landfill. If RDF was classified by the government as a fuel this would help to stimulate the market as it would provide the private sector/plant operators with a product to sell. Ultimately however the choice of technology should be based upon the overall energy balance and CO₂ and other climate change impacts and should be viewed in this light relative to local circumstances and waste arisings.

The future of landfill

Question 28: *Should landfill eventually be the home of last resort taking only non biodegradable residues from waste treatment?*

Yes, landfill should be the home of last resort taking only non-biodegradable residues from waste treatment.

Such a change however would need substantial lead times to implement, with equally long notice of the precise nature of 'treatment' so that appropriate investment can be made.

The only caveat on the use of landfill as a 'home of last resort' in all situations is that 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.

Procurement of waste management services

Question 29: *Views are invited on the proposed actions to improve (the) waste procurement and how to take them forward.*

In the Authority's opinion, the main issues in relation to wastes contract procurement are that:

- procurement professionals may be centrally located within an authority, but procurement needs are within the service area – ensuring that the two teams work together is a first priority
- secondly there is a need to fill skills gaps in procurement
- and thirdly, the procurement of services, which might require an output based approach rather than product procurement which requires a product specification is also a different approach

The Authority suggests that continued procurement support through WIP funded consultancy advice will help with the issues above for specific medium-sized contracts, but there is also an ongoing need to procure smaller contracts and therefore, ongoing support in terms of procurement advice, mentoring and training is also required.

Large contracts however, it appears, will always need substantial external support and additional resource into Defra and the 4Ps would assist this.

Delivering the market capacity for recycled materials

Question 30: *What more could the government do to accelerate the development of markets for recycled materials?*

Firstly the Government could buy more products themselves which are made of recycled materials. Ensuring that all departments commit to buying recycled and monitoring progress on the same is something which could be taken forward by the SDC in its role as government watchdog on sustainability in government from 1st April 2006.

Targets could be set for buying recycled at all levels of government as outlined in the Authority response to question 11.

When developing standards for recycled materials, more could be done to ensure that they will be internationally acceptable so that products have a wider end market.

WRAP's work on end market development should continue to be supported.

Imports and exports

Question 31: *How can we improve compliance with the controls that apply to the export of waste for recycling?*

Improving compliance with export controls can only be achieved in the short term by more frequent inspections to increase the chance of getting caught for those who offend. Increased fines would also be helpful in sending a clear message to those trying to buck the system. A duty of care regime is in place, it just needs to be enforced in both the exporting country and place of import. By making the financial risks of non-compliance sufficiently great is the best opportunity for improving compliance. 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.

A complementary approach for the medium to long term is to take forward the Environmental Services Association (ESA) quality scheme for MRFs and other sites that export materials for recycling overseas. This scheme includes a tracking system to identify where materials are reprocessed. The Authority

supports the Association of London Cleansing Officers' (ALCO's) view that this scheme should be implemented following piloting and evaluation supported by the Environment Agency and Defra.

Question 32: *What should the balance be between the development and encouragement of domestic capacity for recycling and the reliance on overseas markets?*

The recycling and recovery industry works in a global market-based economy, so whilst the further encouragement of domestic capacity of recycling is important for the balance of payments, jobs and outlet security as well as environmental gains in terms of processing material locally and avoiding global transport, domestic capacity has got to be able to compete with overseas markets.

So overseas markets are and will continue to be an important outlet for material in both the short and long term. It is therefore critical to ensure that overseas markets are bona fide, uphold strong environmental standards and meet local environmental control requirements and labour laws etc.

Increasing domestic capacity is an objective which is fully supported by the Authority for the reasons set out above, but it has to be balanced in a market based reality of a global economy.

Commercial and industrial waste

Question 33: *How can we encourage more recycling and recovery of commercial and industrial waste?*

The Authority endorses the ALCO (Association of London Cleansing Officers' response to this question which is paraphrased as follows:

The present system of landfill charges and taxation is sufficient to ensure that larger producers of industrial waste are sufficiently incentivised to recycle and recover material, but this is currently not a sufficient incentive for the smaller commercial waste producers to change their behaviour.

As the packaging waste targets get harder to achieve more interest will be shown by the compliance schemes in these waste streams which should pass through into higher prices paid to local authorities, the community sector and companies to collect the material. As kerbside schemes to households become established with encouragement from the Government they could be extended to SME's with a charge below that of commercial waste collection and disposal.

However the biggest obstacle to recycling of commercial waste from SME's is storage space. Planning guidance must address this.

In addition to maintaining the targets for the recovery of municipal waste for local authorities a requirement on all those providing commercial waste collections (both private & public) to offer a recycling alternative to SME's on request of at least paper, cardboard & glass subject to a reasonable charge is required.

Construction and demolition waste

Question 34: *What more should we do to encourage reduction, recycling and recovery of construction and demolition waste?*

Although the consultation on the Code for Sustainable Homes has now been completed more could be done to legislate to require minimum recycled content material in construction projects to stimulate the market for recycled construction materials. The Code is disappointing in this respect because although it makes provision for site waste management plans as well as outlining the requirements for the provision of recycling facilities within dwellings it includes little in the way of minimum recycled content requirements which is a missed opportunity to encourage greater use of recycled and re-used material in construction projects.

Although the Authority did not respond to the consultation on the Code, the suggestion outlined in WRAP's response to the consultation that 10% of a building's materials by value should come from re-used, reclaimed or recycled sources, a point which had also been recommended by the Sustainable Buildings Task Force, would have been an ideal way to improve the sustainability of construction programmes.

Government could do more in its own procurement strategy to encourage the recycling and recovery of construction and demolition waste.

The Olympic and Paralympic Games in 2012 which are aiming to be a one planet Olympics also provide an excellent opportunity to showcase best practice waste management practice in construction

To encourage further reduction, recycling and recovery of construction and demolition waste the standards of 'recycled' aggregates could be 'relaxed' to allow for blended material to include a mix of recycled and virgin aggregate subject to industry and regulatory acceptance of this.

Small and medium sized enterprises

Question 35: *What are the current practical and cost barriers to recycling SME's?*

The Authority interprets this question as a request for feedback on the practical barriers to SMEs involved in the recycling industry either in terms of practical barriers or cost barriers. In the Authority's view SMEs in the recycling industry face many similar barriers to SMEs in other sectors and therefore in terms of the support which they need to be successful, develop and grow will also be similar to other sectors and primarily this consists of start-up finance, patient loans and capital investment for example, plus business advice, mentoring and support.

Programmes such as the London Remade/London CRN *Enhance* programme which is supporting investment and providing business support in recycling businesses in the community and private sector in London provides a useful model. The Enhance team funded by £1.8 million from the [London Development](#)

[Agency](#) is a comprehensive service for small and medium sized businesses and social enterprises based in London. Support for this should continue.

Question 36: *What might business and commercial providers do to overcome these barriers and how could the government support them?*

The Enhance programme run by London Remade and [London CRN](#) is a comprehensive business support programme that provides tailored assistance in the development and growth of SME's and Social Enterprises involved in waste collection, recycling, manufacturing, re-use, reprocessing and refurbishment in London.

On offer is specifically tailored support and advice in the following areas:

- accessing new markets
- mentoring and business development
- securing finance and funding
- obtaining land and premises
- marketing and communication strategies
- training and skills development
- accessing relevant sector information

This service provides help in overcoming some of the barriers and provides general business and technical support. This is the sort of model which could be used elsewhere, although with a greater focus on market development rather than general consultancy support.

Other RDAs could also be used to provide advice and expertise. A similar approach is being adopted in Yorkshire with the support of the regional development agency (RDA). Yorkshire Forward's RAY (Recycling Action Yorkshire) is typical of this approach. RAY has been established to stimulate collection, processing, manufacturing and procurement of recycling materials within the region.

A not for profit organisation set up with core funding from Yorkshire Forward and the European Regional Development Fund, RAY has been developed in partnership with key regional and national stakeholders.

RAY will work with existing groups and through new programmes to increase recycling, make significant contributions to reduced greenhouse gas emissions, create new jobs and businesses and attract increased private sector investment.

The Government's final waste strategy should encourage or require such work across the country.

Hazardous waste

Question 37: *Do you think the products in paragraph 87 above are sensible priorities for new producer responsibility initiatives and should such initiatives be voluntary or statutory?*

Prioritisation of new producer responsibility initiatives can be by both tonnage and the 'problem' that a waste causes in terms of its hazardousness or possibly rate of growth as a percentage of the waste stream. The materials suggested for consideration for new producer responsibility legislation: solvents (used for industrial cleaning or for lubricating oils), garden pesticides and decorative paints seem sensible. However, both garden pesticides and decorative paints would potentially involve householder takeback schemes which might be quite complex to introduce. The Authority supports the suggestion of starting dialogue with the relevant sectors to discuss the proposals in more detail.

Household hazardous waste

Question 38: *Which of the options for household hazardous waste outlined above should be taken forward?*

The options for good practice on household hazardous waste proposed in the consultation paper all make sense and the Authority is generally supportive of the proposals outlined in paragraph 92. However, in relation to the specific proposals, the possibility of specifying a minimum level of service expected of local authorities for hazardous waste certainly requires some clarification and discussion. Clarification is required in relation to whether government is proposing that this should become a new Best Value indicator and if so the basis on which this will be made. However, the Authority supports the spirit of the options proposed including the suggestion of a requirement on authorities to publish details of the household hazardous waste service they provide but more information is required.

Chapter 6.

National level

Question 39: *What are your views on the proposed Sustainable Waste Programme Board, and on ways for it to engage with waste stakeholders and the wider community?*

The Authority welcomes proposals for a Sustainable Waste Programme Board as outlined in the consultation document. In terms of composition, the Authority recommends 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. These representatives could include Chambers of Commerce, the Environmental Services Association, Trades Union representation to the extent that waste affects employment and other appropriate representation to influence policy and develop outcomes at a national level.

The Authority notes that the board will also require proper resourcing and ideally the secondment of (a) sustainability expert(s) from business or government to set its parameters and establish its role. This work also needs to encompass the findings of the Sustainable Consumption and Production Roundtable.

Regional level

Question 40: *Do you agree that more emphasis is needed on partnership working between local authorities at the regional and sub-regional level on waste procurement?*

Yes, the Authority supports the need for more emphasis on partnership working between local authorities at the regional and sub-regional level on waste procurement and the joint waste disposal authority model operating in North London where the Authority is procuring services on behalf of the seven constituent borough councils is a good example of a useful approach which gains economies of scale. A joint planning group for North London is also procuring services on joint waste planning consultancy support. Both of these actions have been aided by:

- the potential economic savings from joint working
- the threat of LATS penalties affecting all
- the financial link through a levy system between the sub-regional statutory joint waste disposal authority levying the constituent borough councils for its services – so a shared financial structure
- the political link through borough Members being nominated to serve as Authority Members, thereby ensuring joined-up governance
- external support available to guide the work from WIP funded consultants (in the case of the planning procurement process)

Question 41: *What role should be played by the RDAs and local authorities respectively in developing a more closed-loop resource economy; and what activities should they undertake?*

The role of RDAs and local authorities in developing a closed-loop resource economy is inextricably intertwined. However, the Authority would suggest that the RDAs role is primarily one of supporting closed loop investment through organisations like RAY and London Remade, already mentioned above, whilst the local authorities' role is to provide information and material to supply such businesses.

Both organisations can also work together on sustainable procurement, information and communication sharing and overall policy development.

Both tiers of 'government' have sustainability objectives and are working to similar ends.

One of the biggest obstacles however is finding ways to deliver recyclates committed under long term waste contracts to new local reprocessing facilities.

Local level

Question 42: *What are your views on the characteristics for good practice in Local Government set out in Box 2?*

The Authority supports the characteristics of good practice in Local Government as outlined in Box 2 and has no further comments to make on the same.

Question 43: *How effective have LAAs been to date in helping to deliver waste outcomes; and how could partnership arrangements be strengthened for the future at the local or sub-regional level?*

The Authority does not have sufficient experience of LAAs in helping to deliver waste outcomes to comment on their effectiveness.

Improved integration of municipal and business waste management

Question 44: *Is there a demand from businesses for increased help from local authorities with recycling services and resource management?*

From SMEs there is demand for increased help from local authorities with recycling services and resource management, but not from larger companies. SMEs however need face to face support which is ongoing and consistent and also frequently need support covering more than one area. So, waste might be the entry point to an enquiry to a local authority, but they might also need help on energy or water use. Whilst organisations like Envirowise can offer telephone support and have a greater degree of specialism, local authorities know the area, probably know the company and have a good amount of local contacts. Support systems however require considerable resources and more would be required if local authorities are to provide the support.

A strategic role for local authorities

Question 45: *What are your views on the proposed wider strategic role for local authorities and how this could be supported?*

The Authority endorses the ALCO response to this question in that a number of boroughs already undertake the activities listed in box 3 and in principle the Authority supports the wider strategic role for authorities. To maximise its impact it is necessary to provide an advice & guidance role for SME's and funding for this is also required. Most authorities will also require funding to expand their household kerbside collection service to business users. Funding from BREW would be welcome as currently local authorities are excluded from this funding stream.

Some extension of the general 'well-being' powers may also need to take place to the statutory joint waste disposal authorities such as ourselves for this to happen nationally.

Local authorities as wider recycling service providers for business waste

Question 46: *What are your views on placing requirements of this kind on local authorities and/or businesses?*

In response to this question, the Authority also supports the ALCO response which notes that a number of Boroughs already provide a commercial recycling collection service. And, both collection & disposal authorities use a variety of charges to encourage commercial producers to recycle rather than just throw the waste away.

However, as the ALCO response notes, if this type of development takes place it might be more appropriate to change the current household targets to municipal waste targets as we have already outlined.

The Authority also endorses the ALCO view that the Environmental Protection Act already gives authorities powers to ask businesses to segregate and contain waste (in Section 47). But, that careful consideration needs to be taken before extending this to having to use a collection service if it is provided.

Local authorities and producer responsibilities

Question 47: *What changes need to be made to ensure better interaction of producer responsibility schemes and local authorities?*

The Valpak *Packflow* report shows a predicted shortfall in packaging waste recycling and recovery by 2008 of 229,553 tonnes of glass, aluminium, steel and plastic bottles by 2008 and points to the need for producer responsibility schemes to work more closely with local authorities to extract material from 'their' waste stream to which the compliance schemes can take title. Closer joint working will ensure that both parties are working in a co-ordinated way towards local authority recycling and composting targets and compliance scheme packaging targets.

The key issues that need to be resolved in order to ensure better interaction of producer responsibility schemes and local authorities are:

- government guidance on how compliance schemes might work together to make a 'sensible' economic proposal to either an individual authority or group of authorities.
- government guidance on a framework within which 'target sharing' might be agreed between compliance schemes and local authorities to both avoid double counting of material, and also to enable and actively incentivise the different parties to work together.
- an accepted method by which local authorities can attract the 'investment' from compliance schemes which meets local government procurement requirements.
- a 'model' on which to base commercial agreements on the prices and value of the material to be 'owned' by the compliance scheme (the basis of investment for compliance schemes in local authority collection or sorting services) which will work for the wide range of local authority groupings in the market.

However, it must be recognised that the objectives of the two parties are very different – with compliance schemes needing to achieve lowest cost compliance and shareholder value and local authorities focused upon the needs of local communities; the achievement of targets and the avoidance of penalties, and a general desire for the future to minimise risk to the public purse.

Within the proposed wider strategic role for local authorities in relation to business waste there will also be a need for greater integration of producer responsibility schemes and local authority services.

Development of the voluntary and community waste sector

Question 48: *What are your views on the approaches above and how the Government can best facilitate a greater contribution by the voluntary and community sector in delivering waste objectives?*

The Government's recent review of the voluntary and community waste sector in England by the InHouse Policy Consultancy team, Defra 2006, focused upon the contribution that the community and voluntary waste sector could make towards achieving waste strategy targets. Primarily this review was focused upon:

- summarising the scale and nature of the sector
- assessing its contribution to re-use, recycling and composting objectives
- and on quantifying the tonnage diverted by the sector

The report did not focus upon the wider social contribution of the sector or seek to analyse or put value on this, but it did recognise the sector's role as innovators, the sector's move into 'niche' areas of waste and the barriers faced by the sector particularly in terms of public procurement of services.

In the Authority's view the Government can best facilitate a greater contribution by the voluntary and community sector by first recognising that the sector's contribution is not just limited to Waste Strategy objectives or to the objectives of Defra. This means that future evaluation and potential support must encompass dialogue and design of support packages alongside colleagues in ODPM, DfES and the Home Office to name but a few.

Secondly the Government can best facilitate a greater contribution by the voluntary and community sector in the achievement of waste objectives by:

- placing firmer requirements on the public sector to always formally consider working with the community and voluntary sector (CVS) by enhancing the Compact regime.
- secondly by recognising that some types of CVS activity are likely to always be grant dependent and making appropriate long term provision for the same, where this represents Best Value to overall government objectives (i.e. not restricted to the immediate narrow procurement objectives at any point in time).
- thirdly by ensuring that the innovative role of the sector is appropriately rewarded once initiatives and programmes are mainstreamed and passed on to others. Such a reward system

could include advice and support for community groups on how to capitalise best on ideas.

- fourthly by ensuring that there is a funding stream available for innovative projects to which groups can apply.
- fifthly by working with sector umbrella bodies to ensure that properly resourced mentoring or other types of networking support is available.
- finally by ensuring and showing that *central* government is working with the community and voluntary sector in an active way.

Chapter 7.

Waste crime

Question 49: *What additional action is needed either to achieve effective enforcement or to prevent waste crime?*

In relation to waste crime, as the Authority is not a waste collection authority our response is made in general terms.

In terms of prevention more incentives or perhaps grants to provide free collections of bulky waste in particular will help to reduce this problem. And, in terms of more effective enforcement, more regular inspections and larger fines need to be imposed for those acting illegally. The Authority suggests that larger fines are required for illegal disposal. The Authority would also like to see the enforcement agencies able to use not only the fines from such crimes but the proceeds of crime e.g. the sale of confiscated lorries collected by the relevant authorities and retained for improving services.

In practical terms collection authority colleagues are better placed to advise on how central government could best support the achievement of these outcomes.

Similarly, at the national and international level, we rely on the Environment Agency to suggest how to reduce larger-scale environmental crime.

Question 50: *Is there evidence to link the types and quality of local waste collection services and general cleanliness to levels of fly tipping? What changes can be made to service provision that will reduce fly tipping?*

In the Authority's experience of an urban environment there is a link between the quality of local waste collections services (particularly frequency and system design) which impact upon the general levels of cleanliness and fly tipping. Chutes in high rise blocks are a particular problem because they are so easily blocked, resulting in waste being deposited loose by chute entrances, in bin stores and simply dropped over balconies. Encouraging the same levels of participation in recycling and residual waste services for residents who have to walk down a number of flights of stairs to reach the collection point is always going to be more difficult than encouraging participation from residents living in street level properties who have a real 'doorstep' collection service. For the latter the service is easy and convenient, for the former it's not.

A combination of better education, improved design of collection facilities in multiple occupancy dwellings and shared benefits and costs of improved participation or fly tipping removal costs respectively can all help to reduce levels of fly tipping and lead to improved levels of general cleanliness. Providing improved services for bulky waste, selling the benefits of additional recycling services to residents on the basis that they are receiving an additional 'waste' collection and providing as near as possible an equivalent service to those in street level accommodation will all help to improve the levels of compliance with collection systems and therefore general cleanliness on multiple occupancy housing estates. Work in Hackney by the award winning East London Community Recycling Partnership also shows that separate additional collections of kitchen waste on urban estates help to reduce rodent numbers in and around bin stores in particular, thus making residents more confident about going into the bin stores and depositing residual refuse in the appropriate place.

Chapter 8.

Policy Summary

Question 51: *Do you have any further comments?*

Our other comments relate to the method by which this consultation has been managed. Whilst the Authority supports the use of online responses to minimise waste, ensure equality of opportunity to participate and make analysis quicker and easier, the extensive length of this consultation and the number and wide scope of the consultation questions have made this consultation a slow and intensive exercise. A more extensive set of cross-sectoral and professionally facilitated workshops around the country may have stimulated a greater pooling of ideas and therefore more qualitative response to government.

Supporting Documents

Environmental Report

Question 52: *Do you have any comments on the Environmental Report?*

No, the Authority does not have any comments on the Environmental Report.

Partial Regulatory Impact Assessment

Question 53: *Do you have any comments on the Partial Regulatory Impact Assessment of the Review of England's Waste Strategy?*

No, the Authority does not have any comments on the Partial Regulatory Impact Assessment.

Appendix 2

Draft Authority Response to LondonWaste Ltd. regarding their proposals to build a Materials Recycling Facility at the Edmonton EcoPark.

David Sargent
Managing Director
LondonWaste Ltd
Advent Way
Edmonton
London
N18 3AG

Dear David

Proposals for a Materials Recycling Facility at the EcoPark, Edmonton

Thank you for providing us with formal notification, as part of the community consultation process, of your plans to construct and operate a Materials Recycling Facility (MRF) within the EcoPark at Edmonton.

Within the North London Joint Waste Strategy, currently under review by the Mayor of London, it has been demonstrated that three strategic recycling sorting and/or bulking facilities of 100,000 tonnes per annum capacity each are required.

It is also the case that where dry recyclable wastes are being collected commingled by the Constituent Borough Councils, that these are being transported a considerable distance for sorting into their various fractions, before being then transported to the relevant reprocessor. The provision of a local facility would therefore reduce overall environmental impacts and increase strategic security of a suitable sorting service.

From this perspective the Authority supports the provision of local facilities with the ability to sort as wide as possible a range of commingled dry recyclable materials as well as the provision of bulking facilities for source separated materials along with an education or public information centre.

You will be aware that your proposal offers an approach that is compatible with the North London Joint Waste Strategy – Implementation Action 7:D1:

“The Partner Authorities will work together, through the auspices of the North London Waste Authority, to deliver the recycling and composting facilities required in the period of the current waste disposal contract”.

The Authority believes that any such materials recycling facilities should incorporate best practice energy and water efficiency measures, and should, if possible be designed, built and operated to the BREEAM ‘Excellent’ standard,

with the recycled/reused content of the construction materials at a minimum of 10%. This would be in line with the Waste and Resources Action Programmes' response to the Government consultation on Sustainable Homes that 10% of a building's materials by value should come from re-used, reclaimed or recycled sources, a point which had also been recommended by the Sustainable Buildings Task Force.

The Authority welcomes the opportunity to be involved in the planning development of the proposed new facility and would like to thank you for the opportunity to comment at this stage.

Yours sincerely

Andrew Lappage
Head of Waste Strategy and Contracts

Report Ends