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Review of England's Waste Strategy A Consultation Document

Summary of responses to the consultation

August 2006

Produced by Dialogue by Design, Independent Facilitators

Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website: www.defra.gov.uk

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Information about this publication and further copies are available from:

Waste Strategy Review Team
Department for Environment, Food and Rural Affairs (Defra)
Zone 6/D10
Ashdown House
123 Victoria Street
London SW1E 6DE
Email address: wsrt@defra.gsi.gov.uk

This document is also available on the Defra website.

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Executive Summary

The public consultation on the review of England's Waste Strategy ran from 14 February until 9 May 2006. In all 4017 responses were received through the online web pages, by post or by email from a diverse range of individuals and organisations. The range of views expressed was wide and varied and this report provides a brief summary of the responses to each question and provides a flavour of the main issues raised.

There was broad support from stakeholders for the main vision and general direction of the strategy, with main concerns centred around how we deliver the strategy, particularly given the current lack of infrastructure, and whether we have the right balance of options in line with the waste hierarchy. Overall England is felt to be making some progress and to have some of right drivers in place (e.g. LATS) but could be aiming to do more – at least as well as the best in UK and abroad.

Key points included:

- Wide agreement for more emphasis on **waste prevention** and minimisation activities, although the challenge this represents is recognised. Main suggestions are around the better use of regulation, incentives and penalties, and in particular better use of producer responsibility. There was strong support for taking a life-cycle approach during decision-making.
- More effort is needed on **education, information and awareness raising**, for the general public (as consumers) and businesses (e.g. design profession, SMEs) to encourage waste minimisation, reuse and recycling
- There was strong support for **variable charging and/or making waste management costs more transparent** on council tax bills for household waste, although there were some that felt costs were not high enough yet to change people's behaviour. There were also strong concerns over the potential for increased flytipping, and hence calls for greater enforcement and better data capture if any such scheme was introduced.
- Recognition that **LATS** will be strong driver for local authorities to move waste management up the waste stream but strong support for higher **landfill tax** to drive sustainable waste management in other sectors. Many felt it was time to move away from using economic instruments targeted at the end of pipe and instead target resource efficiency through **taxation on materials/products**.
- Support for **more ambitious national targets**, provided there are clear delivery mechanisms in place and continued **local authority targets**, provided adequate resources are provided, but little consensus on how high they should be, how they should be designed and who they should fall on.
- **Energy from waste** and incineration remains controversial with many opponents (mainly through campaign letters), however many of those responding directly to the question see it as a viable option, provided options higher up the hierarchy are exhausted first. Many acknowledge that more evidence and information was needed.
- Most agree that **landfill** should be the last resort for non treatable waste in the long run (once alternative treatment and infrastructure are fully developed)
- The need to **simplify regulation** and change it where it could be more enabling and less obstructive of strategic objectives – especially around the **definition of waste**

- Ongoing support for WRAP. While most respondents favour development and encouragement of **domestic markets** for recyclates rather than relying on international ones, it was recognised that we live in a global economy and that there is a legitimate global market for some waste materials provided standards are met.
- Strong support for **more effort on commercial and industrial waste**, including support for C&I diversion target, but few suggestions on how this would be delivered. The landfill tax escalator and producer responsibility (e.g. packaging targets) seen as the main drivers.
- Strong support for the **sectoral approach**, including prevention targets, especially for packaging and food waste, targeted at the manufacture and retail sectors. Caveats are around availability of reliable data necessary for prioritisation and how targets would be implemented. Most respondents favour a **statutory approach** over purely voluntary agreements, or a combination of both, with voluntary agreements being backed by the threat of regulation.
- Strong support for **more integration** of municipal and other waste streams, but concerns over impacts on LATS. Widespread support for a **greater strategic role for LAs** in facilitating this, provided adequate funding and resources are made available.
- Support for **stronger regional co-ordination in procurement** of waste management services; and strong support for **partnership working** at regional and sub-regional level but disparate views on the effectiveness of Local Area Agreements (LAAs)
- Strong support for **Sustainable Waste Programme Board** provided it has the powers to get things done. Main caveats are around its membership, remit, funding and operation.

INTRODUCTION

The review of Waste Strategy 2000 started in early 2005 working closely with stakeholders using a range of consultation methods, including workshops, seminars, bilateral contacts and structured interviews, as part of the initial evidence gathering and issues and options identification. This culminated in the preparation of a consultation document on the review of England's Waste Strategy¹ for formal 12 week public consultation.

Dialogue by Design was commissioned to facilitate the consultation process. The consultation began on the 14th of February 2006 and lasted 12 weeks until the 9th of May.

The consultation asked a total of 51 questions relating to different key areas for the strategy. In addition participants were asked if they had any comments on the Environment Report² and the Partial Regulatory Impact Assessment³.

With the aim of making the consultation as paperless as possible, stakeholders were encouraged to participate in the online consultation process, although e-mail and paper responses were also received and accepted.

The online consultation process

The online consultation process was straightforward. Participants logged on to a website and registered to participate. On the website they were able to read background information about the consultation, its objectives and how the results would be used; and ground rules for participating in the process. Participants could then read the document on screen and respond to the questions it contained. Responses were recorded in boxes limited to 2,000 characters (about 400 words).

Participation and responses

4017 participants submitted responses during the consultation period. 3432 of these came from individuals, action and environmental groups in the form of standard letters and emails. The remaining 585 submissions came from a mixture of individuals and organisations. The breakdown of who responded is shown in Table A. Table B provides a breakdown of how submissions were received.

Table A – Response by sector

Sector	Count
Central government	4
Local or regional government	188
Government agency or sponsored body	18
Voluntary or environmental organization	90
Waste management industry	40
Other business	51
Professional institute or trade association	49
Financial institution	5
Academic or consultancy	55
Individual ⁴	3449

¹ <http://www.defra.gov.uk/corporate/consult/wastestratereview/review-consult.pdf>

² <http://www.defra.gov.uk/corporate/consult/wastestratereview/environreport-rev.pdf>

³ <http://www.defra.gov.uk/corporate/consult/wastestratereview/partialRIA.pdf>

Sector	Count
Other	18
Total	4017

Table B – Form of response

Form	Count
Online submission	295
Email or postal submission	290
Standard letter/ email	3432

Any e-mail or paper-based responses that used the online question structure were entered into the same database as the online submissions. Submissions that did not use the question structure, and as a consequence could not be entered into the database, were read and their contents taken into consideration under the relevant question areas during the analysis of responses.

After the consultation closed, the responses (that considered the questions) were collated and grouped under appropriate headings by independent facilitators from Dialogue by Design.

Purpose and format

This report, prepared by Dialogue by Design, summarises all the responses to the strategy review document and provides a flavour of the main issues raised.

The range of views expressed is, as you would expect, diverse and varied. We provide here a brief summary of the responses to each question by first presenting key points and themes, an indication of the differences or similarities of views expressed by participants from different sectors such as local government, community recyclers, the waste industry and environmental groups, and then a table showing how the responses to that question have been collated. Responses containing more than one idea may have been collated under more than one heading.

At the beginning of each summary you will find a figure for the number of participants who responded to that question within the question structure either online, by post or by e-mail. It does not include those responses that did not use the question structure; these other submissions, however, have been taken into consideration during the analysis of responses within the relevant question areas.

Interpretation of results

It is important to remember, when seeking to interpret the results, that this is a qualitative consultation, not an opinion poll: its primary purpose is to collect ideas, arguments and information.

Care must be exercised, therefore, in attributing too much significance to the proportion of responses arguing in one direction or another. The grouping of comments under summary headings should also not be interpreted on a purely statistical basis.

The groupings are useful indicators of where there is some degree of commonality among responses. Taken in relation to each other, they help to clarify the range of issues and concerns identified by a multiplicity of stakeholders, and where general agreement or specific differences exist. The categorisation of responses is also necessarily simplistic given their complexity, so for this reason again it would be unwise to draw firm quantitative conclusions from them.

⁴ Note: This includes the 3432 submissions in the form of standard letters

Finally, it is important to appreciate the scale and complexity of this consultation and the depth and expertise evident in the many thousands of responses received to the questions. Reading this brief summary is no substitute for a thorough reading of the actual responses.

All responses, as well as a list of participants, can be viewed on the consultation website:
<http://defrawaste.dialoguebydesign.net>

Next Steps

We wish to thank everyone for responding to the consultation. A wealth of information was received, from a diverse range of individuals and organizations. Defra are now carefully considering responses to the consultation during development of the revised waste strategy, which we intend to publish later this year.

CHAPTER 1 – 2006 PROGRESS REPORT AND CONSULTATION: THE BACKGROUND

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.)

This question has been answered by 396 participants. Stakeholders responded to this question in three different ways: some talk about the consultation document, its format and structure, and the consultation process; others summarise the key issues they want to raise in response to the whole document; and the third type of responses highlight specific issues or themes.

Comments on the **consultation process** include concerns that it has been too long and not customer facing, which makes it difficult for some sectors (such as SMEs) to engage with. Some felt the timing was good for local authorities, but expressed concerns that there needed to be a stronger sense of urgency if packaging and landfill directive targets are to be met.

There are mixed views on the **format of the document**. While some recognise the amount of work that has gone in to it, and that it provides depth and is well structured, others feel it is too long, repetitious and full of jargon. It could have been improved by structuring the content by consultation groups' interests (e.g. designers), and by asking fewer and more open questions. One concern is that the length of the consultation in terms of number of questions is likely to lead to delays in the results being published and therefore the whole strategy production process will be slow.

Some participants express **full support for the approach** taken, recognising achievements to date and the commitment to further progress. Most participants **welcome the approach, albeit with caveats**. These are:

- The document and the vision should be more ambitious
- There is a lack of overall vision and leadership: the role of government must be more clearly defined and it should take a lead
- There needs to be more integration of sustainable production and consumption
- There are insufficient links to those on the ground and not enough about implementation and delivery mechanisms
- There is still too much focus on Municipal Solid Waste (MSW) compared to wider wastes.

Some responses **challenge the overall approach**. On the whole these are principally from participants not convinced that waste reduction, re-use, recycling and composting are being made the primary priorities. There is concern among some that energy recovery using Energy from Waste (EfW) incineration is driving the strategy (see below), and further, that some of the new, more innovative technologies such as anaerobic digestion and gasification are being ignored. The majority of the standard and form letters take this view.

The issue that is raised most often is **how the strategy will be implemented**. Participants want a much clearer sense of how the strategy will actually be delivered: where the funding will come from; whether it will be possible to develop the necessary infrastructure in time; and how other policies fit with it.

The subject of **Energy from Waste** is raised consistently throughout the consultation and is dealt with in detail under Question 26. It comes up extensively in responses to this question. Of those who refer to EfW, some submissions welcome the proposals, but most are opposed on safety grounds and because of the aforementioned fear that it undermines the focus on addressing issues further up

the waste hierarchy. The need for a **zero waste** approach is also raised by a number of participants, both online and in standard and form letters.

Q1: Do you have any general comments on the document?

Group	Number of comments
Key points / summary of submission	171
Support for the approach	86
Delivery issues	82
Comments on EfW	47
Comments of the format of the document	37
Challenge the approach	32
Respondee description/contribution	21
Comments on the consultation process	17
Waste prevention and resource management	17
Other specific issues	10
Zero waste issues	7
Detailed text comments	4
Comments on the vision	2
Health issues	2

CHAPTER 2 – A NEW VISION

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?

Of the 394 participants who responded to this question, 142 clearly argue for **higher targets** for recycling and composting. They are mainly from representatives of local authorities and environmental/voluntary groups (in equal numbers), with only a few from waste management organisations, although this includes the national association representing community recyclers (CRN). The great majority of standard and form letters also stress the need for significantly higher targets, suggesting at least 75% by 2015. Most of the online submissions and specific responses to this question specify revised targets for 2010, 2015 and 2020. Some support the 2010 targets, but feel the later dates should be more ambitious. Others put forward an alternative approach – that of working towards zero waste by a given date e.g. by 2020 (see Zero Waste Charter in Appendix A).

However, roughly the same number of local authorities as those wanting higher targets, and notably more waste management companies, **support the targets as proposed**, while noting that significant investment and infrastructure development will be needed to meet them (see below). Others, primarily local authorities, express concerns that the proposed **targets are too ambitious** and many local authorities will find them impossible to meet in the timescales suggested.

There are some comments **challenging the use of national targets** at all. These come from a spread of sectors, including local authorities, waste management companies and environment and voluntary groups. The reasons vary but include: a sense that local variations mean that national targets are not always appropriate; that recycling targets deflect from the need for more focus on waste minimisation; and that they can encourage ‘bad’ recycling such as exports.

Some participants make suggestions about **the way targets are set**. There is quite a lot of support for keeping local targets either instead of, or within, a national target framework; and suggestions for how to address differences between urban and rural areas, and high and low achievers. Many participants, regardless of their sector and whether or not they support the proposed targets, focus on the **cost implications** and need for sufficient **funding and additional powers** for Local Authorities.

Others suggest **redefining targets**, for example suggesting targets should be around landfill diversion rather than recycling and composting; setting two levels of 'minimum' and 'aspirational'; and targets by volume not weight. There are concerns about the **inclusion of composting** in a combined target with dry recyclables, rather than separate targets for both, because it will further encourage local authorities to collect green waste from households instead of promoting home composting (LATS is already perceived to be having this effect).

Many participants talk about the need for **waste reduction targets** either instead of, or as well as, recycling and composting targets. This point is echoed in the standard and form letters.

Q2: What are your views on proposed national household recycling and composting targets and the level they should be set at?

Group	Number of comments
Set higher targets	142
Support these targets	72
Cost implication of reaching targets	42
Basis on which targets are set	33

Minimisation and reuse targets	32
Targets too ambitious	30
General observation	27
Measures needed to achieve targets	27
Green waste and composting issues	24
Challenge the use of national targets	19
Links to local and regional targets	19
Link targets to landfill diversion	15
Set targets for wider wastes	15
Enforcement and measurement issues	14
Redefinition of targets	12
Quality and market of recycled products	8
Concerns over energy recovery	7
Relationship with LATS targets	3
Clarification of terms	1
Health and safety issues	1

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

336 participants responded to this question. Many of the points are similar to those made in response to Question 2. Those who **support target setting** believe this is a good way to show commitment to reducing landfill, and that it fits well with the need to address commercial and industrial wastes. Local authorities in particular support the proposal because it allows the integration of household with commercial waste streams, which tend to be more homogenous and easier to recycle. Their main proviso is that local authorities should be free to decide on the most appropriate local solutions to meet recovery targets, and that responsibilities and funding are clearly identified.

Roughly equal numbers of responses **challenge setting total recovery targets** at all, especially environmental and community groups who are concerned that recovery targets will lead to a preference for EfW over recycling and composting, or that incineration technology will take precedence over other forms of EfW such as Anaerobic Digestion or Refuse Derived Fuel (RDF). Such concerns form the main thrust of the standard and form letters. Other responses object that the timetable will not be achievable because of the length of time needed to build necessary facilities. Responses from the waste management industry indicate a mix of support and disagreement with the proposal.

Targets are perceived by some as **only useful when the main focus is on** delivery, when **resources are available** to develop the necessary delivery infrastructure (through mix of direct funding, financial incentives, changes to local authority powers etc), and when there is sufficient **market development**.

There are a significant number of comments around linking recovery targets to **landfill diversion and LATS**. Many participants, especially from local authorities but also from the waste management industry, feel that LATS are a more effective driver than household waste recovery targets, while some responses observe that local authorities cannot meet LATS without some form of EfW.

Many responses mention **enforcement, monitoring and implementation** issues. There is a need for good **data collection** (set as benchmarks at the beginning and ongoing), as well as enforcement mechanisms and penalties that act as incentives to meet targets. Some responses also argue for tools to be able to compare recovery options, for example to assess net environmental gain such as CO₂ equivalency.

Greater clarity and consistency around the **definition of municipal waste** is requested, for example that it should be in line with EU definitions, that it is always broader than just household waste, and to

what extent it includes commercial waste and items such as abandoned vehicles. Some responses feel the targets should be **set higher**.

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

Group	Number of comments
Support idea of recovery targets	89
Challenge idea of recovery targets	81
Concern that EfW may dominate	56
Enforcement, measurement and implementation	44
Link to landfill diversion/LATS	36
All municipal waste should be included	24
Set higher targets	22
Clarification of terms	13
Link to waste reduction and reuse targets	12
General comments on targets	11
Government should give clear support to EfW	5
Need to tackle commercial and industrial waste	5
Health and safety issues	3

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?

337 participants responded to this question. There is a lot of **support for the principle of targets** for the landfilling of commercial and industrial waste, particularly from local authorities, but also from environmental and community organisations and some waste management companies. The reasons given are the high amounts of waste arising from this sector, and the clear message it would give. However, many participants, across a range of sectors feel the proposed levels are **too low**.

Smaller numbers, again from a range of sectors and including some of the large waste management companies, challenge the value of using targets. Reasons include: that companies respond better to **financial drivers** to incentivise them; that there simply is **not enough data** on waste arisings to set targets at the moment; and that certain waste streams such as WEEE, biodegradable waste or hazardous wastes should be **banned from landfill** altogether.

There are a lot of queries about **how the targets will be delivered** and **who has responsibility**. While some participants feel that local authorities should take on this role (providing they are given additional funds and powers), others do not regard this waste stream as something LAs can or should help with. Many of the standard and form letters argue for compulsory waste reduction targets for companies like supermarkets, especially for wastes that cannot be recycled or composted.

As with other questions, participants raise the issues of **enforcement and monitoring**, the need for **waste reduction targets**, and links to **LATS**.

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?

Group	Number of comments
Support targets	98
Targets too low	89
Delivery issues	36
Enforcement issues	33
Need more data or information	33
Priority must be reduction, reuse, recycling	31
Challenge use of targets for this sector	28
Increase landfill tax	28

Set reduction or recycling targets by waste stream	26
Harmonise or match with municipal targets	22
Concern over EfW	21
Clarification of who is obligated	15
Targets for biodegradable waste	15
Do not rule out landfill for some forms of waste	13
Link to landfill diversion targets or LATS	11
Cost implications of meeting targets	10
Market forces are a key influence	10
Support EfW compared to landfill	6
Link to waste reduction	4
Set targets by weight not percentage	4
Organisation description or contribution	3
Set targets by market sectors	3
Adopt zero waste	2
Definition of waste	2
Use tax incentive schemes	1

CHAPTER 3 – THE POLICY FRAMEWORK

The regulatory framework

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

This question elicited a very wide range of issues from the 322 participants who responded to it. Some responses refer to specific regulations, while others take a more general overview of regulatory issues.

The issue of how **waste is defined** comes up to a great extent in responses to this as well as to many other questions. Respondents saw a need for more clarity, and some relaxation of the definition around “when waste ceases to be waste” and becomes a raw material or by-product, so that it can be exempted from some of the waste treatment licensing and permitting requirements. Responses said that the aim should be, as far as possible, to treat recycle the same as primary materials in regulations covering transport, manufacture, energy production and use. This is raised as a key to increasing reprocessing capacity and stimulating end use markets, both by community recyclers, local authorities and large waste management companies.

There is a strong sense across all sectors that the current licensing and permitting regime is **overly complicated and many find it unnecessarily costly**. It is therefore seen to act as **a disincentive to investment and expansion** of capacity, for both large and small operators and in particular community schemes such as composting and refurbishment projects. Some responses regard this as **a barrier to entering the market** for potential recyclers and reprocessors.

Some responses seek exemptions for particular sectors or waste streams, while the majority across all sectors want a **simple and easy** to regulate regime, whether applied to waste handling or waste production, that large and small organisations can work within. Ease of regulation must, however, be **well enforced**, and thereby command public trust. A few comments reinforce this issue by expressing **concern about relaxing regulation** on the waste industry in the light of examples of bad practice and a poor public reputation.

Delivery and implementation issues are especially highlighted by those subject to regulation. They stress the need for better communication, for example clear user-centred **guidance and adequate funding**. There are suggestions from the waste management industry that regulation should be applied to unlicensed operators, with the extra funding requirement coming from either the public purse or through a hypothecated proportion of an increased landfill tax accelerator. The **ability to comply** within the current regime is also raised especially in relation to small businesses and community operators.

Some suggestions on improving the regulatory regime include **strengthening Duty of Care** and ensuring it is enforced; providing more integration and consistency between regulatory regimes, including European regulations; and across other policy areas such as energy, soil and agriculture.

A number of responses, particularly from environmental groups, consider that the regulatory framework needs to start more from a **sustainability** point of view, focusing on supporting re-use and recycling and resource management, for example by requiring industry to design products for recycling and minimal overall environmental impact and introducing restrictions on landfilling and incineration of recyclable and compostable materials. The standard and form letters reinforce this point, arguing for a ban on incineration, legislation to reduce and control packaging, and changes to building regulations to require new housing to incorporate storage facilities for separating waste.

A range of responses address the subject of **stakeholder involvement**, principally expressing the need for more engagement with citizens, NGOs, SMEs, industry and others, extending to coordination between regulators, such as the EA, with planning authorities and the planning process.

Some **specific regulatory changes** are suggested to:

- LATS - increasing landfill tax and extending LATS to commercial and industrial waste
- Further development of and learning from producer responsibility, especially around packaging and WEEE (Waste Electrical and Electronic Equipment)
- WEEE implementation – to address the lack of certainty about the introduction of regulations and ensure the directive can be met
- Compost - enabling more small scale composting via exemptions
- PFI contracts - enabling them to be more flexible
- Introduction of variable charging for collection of waste
- Pyrolysis technology - enabling it within the EU waste framework directive
- Animal by-products legislation - to clarify composting and AD issues
- Health and safety regulations around reuse
- Mandatory re-use credits provided by local authorities to community organisations
- Review planning and building regulations to encourage more re-use and recycling
- Application of PPC regulations and proposed EPC regulations
- Requirement to produce municipal waste management strategies
- Making participation in recycling mandatory.

Q5: What further specific improvements, if any, would you like to see to the regulatory framework?

Group	Number of comments
Licensing, permits and planning issues	80
Simplification and clarity	78
More joined up thinking and planning	41
Enforcement issues	37
Changes to specific regulation	34
Guidance issues	26
Definitions of waste	24
Stakeholder involvement	24
Need for effective communication	21
Producer Responsibility	21
Delivery issues	20
Fiscal incentives, penalties and landfill tax	20
Ability to comply	16
Prioritising most sustainable approach	16
Links to EU/International developments	14
Regulatory bodies	13
Reducing delay and uncertainty	12
Packaging regulations	11
Understanding business/services better	11
Variable charging	11
Duty of Care	10
General comments	9
LATS	9
Concerns around EfW	8
Need for mandatory targets and participation	7
Regulatory rigour	6
Ease reporting processes	5
Public access to information	5
Partnership working	3
Reward good practise	3

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?

344 participants responded to this question. Most responses support the **extension of stewardship**, with some specifying that this should be both at the individual and collective levels. The reasons for support include the **polluter pays principle**, and the significant impact such an extension would have on waste reduction, the minimisation of hazardous waste and the funding of end of life reuse, recycling and recovery programmes. Those at the sharp end of waste management such as local authorities, community recyclers and large waste management companies, while being strongly in favour of extension of the concept, stress the need for a much stronger focus on **improved implementation**. Appropriate mechanisms for each material/product stream need to be identified, but within a **coordinated framework** so that the different players can maximise their contribution and avoid confusing consumers through unnecessary fragmentation and complexity. WEEE (Waste Electrical and Electronic Equipment) is cited by many of those involved in recycling, as an area where implementation needs to be urgently improved.

A range of key sectors are suggested as **areas** for extending stewardship. **Packaging and plastics** is regarded as a key priority area by many participants, especially those with an environmental interest. Other priority areas include **food producers and retailers, hazardous waste materials, textiles, electrical and white goods, and construction and building materials**. The standard and form letters also stress packaging, plastics, hazardous materials and those that are difficult to recycle, or easy to avoid, such as disposables, as key areas for extending stewardship.

There is a strong sense that a **lifecycle approach** should be taken, and that manufacturers should consider the impacts of their products from design to disposal. This point is developed further by some participants who discuss **prioritisation criteria**, such as determining which products to focus on by CO₂ impacts, by hazard content or by recyclability.

Many participants discuss the need for placing producer responsibility within a **regulatory framework**, often citing the WEEE directive as an example. Responses from environmental and community groups also argue for compulsory waste minimisation targets for waste producers such as supermarkets. Other methods of forcing producer responsibility are suggested: **fiscal methods**, such as increasing landfill tax; taxing products and processes that are excessively wasteful; and taxing packaging. Incentives are also mentioned, for example allowing the material processor to keep some of the PRN revenue to fund new investment. Those in local authorities with responsibility for recycling tend to prefer market intervention, such as material price support for independent take-back facilities over direct funding from private sectors to local authorities. Local authorities also want to examine how PR can be delivered through local authority contracts and services. Of those participants who expressed a preference for **voluntary agreements**, there are caveats made, such as the threat of regulation if voluntary agreements do not deliver, and ensuring they are audited and monitored (see next question for more on voluntary agreements.)

There are some participants who **challenge the potential scope** for extension. Concerns include: the market is a better driver; legislating for producer responsibility may encourage bad environmental practice such as increased transport costs; and a sense that packaging regulations, WEEE and ELV (end-of-life vehicles) arrangements have not been proven and therefore more consideration is needed before further extension.

Q6: 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?

Group	Number of comments
Key sector – packaging & plastics	114
Support extension of stewardship	79
Key sector – other	71
Fiscal incentives and penalties	69
Targets and regulation	67
Lifecycle approach	54
Consumer role and education	33
Role of retailer	28
Comments on voluntary initiatives	27
Key sector – hazardous waste	27
Concerns over extension of stewardship	26
Learning from other sectors	24
Link to delivery of services	24
Key sector - food producers & retailers	23
Refer to other response	19
Key sector - prioritisation process	17
Market stimulation	14
Improve labelling	11
Key sector - electrical and white goods	9
Key sector - construction and building	6
Key sector – textiles	6
Opportunities for SMEs to participate	4

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

325 participants responded to this question. There is a strong preference for **statutory requirements** over voluntary agreements particularly from local authorities, community recyclers and environmental and community groups, but also from some waste management companies. This view is echoed in the standard and form letters.

Support is based on experience of only limited results when voluntary agreements are used; belief that voluntary agreements fail to send the right messages to industry and the general public; a sense that industry is driven by commercial issues and will only act if there is a commercial advantage to them; and concerns about the time and resources that are consumed by negotiating such agreements without a guarantee of success, for example the collapse of the recent voluntary agreement around pesticides. Environmental groups also argue that statutory approaches deliver innovation, consistency and a more level playing field, especially if introduced as EU regulations.

A significant number of participants talk about the **interface between a voluntary and regulatory approach**: the potential for voluntary agreements set in a regulatory framework or for regulations running alongside voluntary schemes. Some supporters of statutory approaches in local authorities recognise the need to maintain competitiveness in an international context and therefore propose that the first step should be to seek the widest possible and most ambitious voluntary targets within a context of definite statutory intervention, should targets not be sufficiently ambitious or not met.

The threat of moving swiftly to a statutory approach is also supported by those in the waste management industry who favour a voluntary approach. This support comes with caveats, such as the need for whole sector to be involved to avoid 'free riders' (example cited of the failure of farm recycling plastics scheme); and that it is accompanied by robust, audited data capture to measure progress and allow government to assess whether the voluntary approach is achieving the desired

result, making use of the IT systems many businesses already have in place for tracking product sales.

The use of **targets and benchmarking** is suggested as a useful means of supporting voluntary agreements and regulated obligations, for example in relation to purchasing recycled materials and products.

Q7: What are your views on seeking voluntary agreements as an alternative to statutory approaches?

Group	Number of comments
Prefer statutory	149
Need both voluntary and statutory	103
Finance / economic issues	62
Prefer voluntary, with caveats / concerns	53
Sector-specific comments	39
Need targets / benchmarking	36
Enforcement / monitoring issues	32
Competition / commercial issues	31
Refer to other response	17
Prefer voluntary	16
Education and information issues	14
Engage industry	10
General / other comments	5
Supply / value chain issues	5
Particular challenges for SMEs	3
Need cultural change	1
New statutory body	1

An effective pricing framework

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

320 participants responded to this question. Most submissions recognise that pricing is an important driver but refer to the **limited effectiveness** of current pricing in driving behaviour, and to ways of **increasing and developing pricing mechanisms**. Responses on limited effectiveness note that current pricing has not yet delivered the desired change.

Many feel that current prices have little effect on household waste management activity. A missing element, therefore, identified particularly by many local authorities is the use of **variable charging for householders** to drive prevention and reduction of waste. There is mixed support from the waste management industry for variable charging, some strongly in favour while others prefer making the actual **costs of waste management more transparent** on the council tax bill, for example, in the same way that other consumption based utilities are itemised as cost per household per annum.

Variable charging is also one of the key suggestions in the standard and form letters, which, in line with environmental groups' online responses, additionally argue for extending the landfill tax to a **disposal tax** and having a specific **tax on incineration**. Conversely some local authorities want **economic drivers to stimulate energy recovery** from waste to compensate for the lack of demand from the energy market provided it fits with long-term sustainable energy objectives.

LATS and the landfill tax escalator are widely recognised to be **major drivers**. While many feel these have already made a difference, there is a strong sense from all sectors that **landfill prices are not yet sufficient** to really drive the desired change in behaviour, particularly in the higher value

materials markets, with landfill still being the cheapest option. Many feel that while landfill tax is starting to have an impact on large businesses, it provides little incentive to smaller businesses (SMEs). Some environmental groups and waste management companies suggest refinements, including raising the escalator higher and/or faster to raise the cost of landfill disposal to equal or higher than other waste reprocessing options and raw material production; diverting increased revenues to help establish infrastructure development such as the target of doorstep collections for every household by 2010; and introducing a differential rate for stabilised wastes to stimulate stabilisation technologies. LATS is felt to have **little or no impact on the private sector and there are calls, for example from community recyclers, for it to be applied to businesses**. Many felt it was time to move away from using economic instruments targeted at the end of pipe and instead target resource efficiency and waste minimisation through **taxation on materials/products**.

There are those who feel **prices already beginning to drive behaviour** effectively, citing examples of construction and demolition waste due to a combination of the landfill tax, aggregate levy and the impact of packaging regulations. Some feel that recently introduced pricing mechanisms (landfill tax and LATs) should be given time to deliver and not be changed at this stage.

Caution on using price mechanisms is also expressed. For example some waste management companies point out that higher costs of licensed disposal has led to increased fly tipping and use of exemptions for non-licensed disposal. There is some discussion around the **need for facilities for re-use and repair, as well as recycling, and robust data capture and management** alongside price drivers to ensure waste is diverted in the best possible way.

Q8: How effectively do current prices drive the behaviour of those involved in preventing, producing or managing waste?

Group	Number of comments
Limited effectiveness of current pricing	178
Issues with landfill / LATS	106
Increase / expand pricing system	102
Markets, incentives and competition	85
Current pricing is an effective driver	56
Enforcement and regulation	43
Issues with facilities / services	43
Education / information issues	39
Household charging	30
Incineration and energy from waste	19
Issues for SMEs	19
Importance of waste minimisation	18
Other drivers	18
General observations on pricing	16
Learn from other countries	14
Refer to other response	14
Refer to oil / energy prices	7

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

271 participants responded to this question. Their responses are fairly evenly divided between those who challenge the use of such schemes and those who want to see an extension of tradable allowances and/or the introduction of new schemes.

Challenges to tradable allowances include the arguments that costs tend not to be enough to change behaviour; schemes focus on dealing with waste not preventing waste; there is evidence that the public do not regard these schemes as incentives to change behaviour; they are complex and resource intensive to manage; and they tend to enable participants to buy their way out, rather than make the behaviour changes needed.

There is a strong sense that the **landfill allowance scheme is still in its infancy** and needs to be given time to work and then be **monitored and assessed** before any further changes or additions are made. This view is especially expressed by local authorities, some of which are concerned about the high risks and costs they feel the scheme carries. However, an area which some participants would like to see changed in the short term is permitting the use of banked diversion in target years so that local authorities are not punished when they over-achieve leading up to a target year.

Suggestions for an **extension of tradable allowance schemes** include extending LATS to the private sector so it can include commercial and industrial waste.

Variable charging is raised in a range of responses, especially by environmental groups and community recyclers, while some add the caveat that this should only be introduced once a good recycling infrastructure is available, and without a disproportionate impact on low income households, for example through a similar rebate system to that operated for council tax. Variable charging is strongly supported in the standard and form letters.

Virgin Material tax – interest is expressed in extending the aggregates levy to a broader levy on raw materials. It is also suggested that the income from such a tax could be used as a fund to support other waste reduction or recycling schemes.

Extend re-use and recycling credits - in particular remove the cap on credits to get funds to community recyclers and refurbishers, who as not-for-profit organisations plough all revenues back into services. Other suggestions include offering credits to householders for home composting.

Other schemes suggested include providing **start-up grants**, linking schemes to the **renewables obligation (ROCs) to stimulate EfW including waste derived fuel, carbon trading**, tradable permits in methane for landfill operators with biologically active sites, and the introduction of **waste minimisation credits**. The Zero Waste Charter outlined in some of the standard letters recommends extending the landfill tax into a disposal tax and using the income to fund Zero Waste programmes.

Q9: Are there further tradable allowance (or other) schemes that could be developed to help the market delivers environmental outcomes more efficiently?

Group	Number of comments
Challenge the use of these schemes	47
Extend tradable allowances	38
Monitor existing schemes	31
Variable charging	26
General comments	23
Extend recycling and re-use credit scheme	20
Virgin material tax	20
Tax incentives	17
A waste levy or fund	8
Link to ROCs	6
Deposit scheme funds	5
Grants	5
Simplify the system	5
Waste minimisation credits	5
Set up carbon trading system	4
Consider barriers to investment	1
Develop BVPI for waste	1
Increase producer responsibility	1
Other ideas	1
Require reporting	1
Use legislation	1

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?

355 participants responded to this question. The great majority across all sectors **support more effort** on prevention and minimisation relative to recycling. This view is also strongly expressed in the standard and form letters.

There are many suggestions on **how best to encourage more waste prevention by the public**. In terms of how this should be achieved, there is widespread support for a specific focus in national **education and awareness campaigns**, including education in schools, and targeting behaviour consistently in the workplace as well as in the home, for example as part of the **national curriculum**. Many participants acknowledge the work done by WRAP, and are broadly positive about an **extension of WRAP's remit** into prevention and minimisation. Some concern is expressed, however, that local campaigns should continue, and that they should be well integrated with national ones.

Other suggestions include greater promotion of home composting; support for repair and refurbishment schemes; minimisation targets for local authorities and waste producers; the introduction of a BVPI for minimisation; variable charging; take-back schemes; and specific measures to deal with packaging and plastic bags such as bans or taxes. The standard and form letters stress the need to prevent local authorities being tied into contracts that require them to maintain, rather than reduce, the level of waste arisings, in order to ensure sufficient feedstock for incinerators.

There is a strong feeling, especially from many local authorities, community recyclers and environmental groups, that **focusing more on producers and retailers** would encourage and enable the public to reduce their own waste. This view is expanded on by those participants who feel that **financial penalties and incentives** should be placed on producers to design products for repair and refurbishment, and to reduce the packaging they use. The standard and form letters also pick up on this issue, asking for a far more proactive approach to waste minimisation (in particular putting pressure on those who supply waste material to householders), and for compulsory waste reduction targets for companies such as supermarkets, especially for waste, which cannot be recycled or composted.

The very **few who disagree** generally express the view that achieving this type of behaviour change is **too difficult** and that effort should focus on recycling.

Q10: Should there be greater effort to encourage waste prevention and minimisation relative to recycling and, if so, how should this be done?

Group	Number of comments
How - education and awareness	167
Yes - there should be more effort	138
How - financial incentives and penalties	67
Focus on producers and retailers	64
How - support reuse, repair and refurbishment	53
How - Variable charging for collections	47
Packaging issues	45
How - set minimisation targets	37
How – WRAP and other communications campaigns	36
Comments on recycling	27
How - Promote home composting	27
How - product and building design	20
How - use BVPIs	16

How - reduce junk mail	13
How - plastic bag tax	9
No - should not be greater effort in this area	8
Reservations around targets	8
How - alternate weekly collections	7
How - Take back schemes	6
Link to local issues	6
Links to other social issues	5
Definition of waste	4
How - NRW waste prevention toolkit	4
Comments on other published reports	2
How - league tables	1
Reservations around variable charging	1

Business

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

278 participants responded to this question. **Financial drivers and incentives** are cited by large numbers of participants in recognition that business is largely cost driven, although only a few expand on what form this might take. Of those that do specify, most refer to a tax on virgin materials, beneficial VAT on recycled materials, taxing non-sustainable business practices and increases in landfill tax.

Education, information and marketing are regularly mentioned as key ways of engaging business, with support expressed for initiatives from BREW, NISP and WRAP. However, the responses from many waste management companies, community recyclers, environmental groups and local authorities indicate that such communication is unlikely to achieve the required shift in isolation from a full range of measures to incentivise, require and penalise business.

Encouraging or supporting business in their **procurement choices** is identified as a key way forward by many participants across all sectors. Some cite the effectiveness of existing **codes and guidance for green procurement**, such as the Mayor of London's "Green Procurement Code", while others suggest **award schemes, procurement standards** and the **extension of environmental labelling**.

As with previous questions, there are those, particularly local authorities and environmental groups, who consider a purely voluntary approach will not be enough. Their proposals include national legislation to set minimum levels of recycled material in all products; specifications in planning and building controls for new build and construction projects; requirements imposed by local authorities on their suppliers; targets for Commercial and Industrial waste; and requirements placed on all businesses to set their own targets and to report on progress.

There are particular references to the problems facing **SMEs** and their special needs, such as limited resources and access to facilities and their low awareness of their own environmental impact and obligation. SMEs are also identified as a key group to target because they make up such a large proportion of the business population in the UK. Local authorities are often suggested (along with BREW, WRAP and others) as good sources of support to SMEs.

Others talk about the need to use **legislation** such as extending producer responsibility and relaxing the requirements on handling 'waste'.

Q11: How can businesses be engaged in their capacity as purchasers and providers of services?

Group	Number of comments
Financial drivers and incentives	94
Information, education and marketing	59
Procurement policy	41
Support to SMEs	33
Legislation	30
Award schemes and standards	27
General observations	14
Institutional arrangements	14
Material exchange or bring schemes	10
Penalties and enforcement	10
Reporting schemes	10
Targets for C and I waste	9
Refer to other response	7
Product labelling	6
Product design	5
Driven by public perception	4
Encourage local CHP	2

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?

287 participants responded to this question. It is suggested by large numbers, across all sectors, that one of the main leadership roles the Government can take is in their own **procurement policies, for example by specifying minimum recycled content and recyclability/compostability**, both as an example to others, and because the large purchasing power of the Government will help send the right messages to the market and contribute to market transformation.

However, there are concerns that this must involve a far greater commitment to sustainable **resource management** across **all areas of Government** and ensure that **consistent messages and policies** are followed so that housing, education and health departments, for example, adopt green construction and sustainable energy requirements.

Many responses, including those from environmental groups, stress the need for the Government to be **open and transparent**, with the suggestion that regular reporting on performance should be made available. One way of achieving this would be for the Government to set itself targets, for example to phase out residual waste, and check that they are met. Providing **good practice** and **case study** examples is also suggested as a role for Government.

Specific measures Government could take include stopping the use the 'best before' dates on food, minimising packaging in office canteens, office recycling schemes, and reducing printed materials

Q12: What more can the Government do to provide a lead?

Group	Number of comments
Procurement policies	87
Lead by example	60
Openness, transparency and reporting	50
Targets, setting and achieving them	33
Share good practice, learning and info	27
Build policies into all areas of government	24
Specific proposals	24

General observations	12
Issues around EfW	11
Link to other policies	10
Enable infrastructure and facilities	8
Provide funding and incentives	8
Specifications for public contracts	8
Focus on re-use	6
Work with stakeholders and partnerships	6
Single department for waste	2
Review two tier local government structure	1

Evidence for development of future policies

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

282 participants responded to this question. Respondents suggested multiple areas where further waste and resources related research is needed. A few respondents indicated that emphasis now needs to be placed on transferring or integrating research findings into the policy arena. The list in the table below shows attempts to classify the comments into possible areas for further research. This summary touches on the ones mentioned most.

Lifecycle assessment and resource flows is an area raised by a number of participants, with particular support from local authorities, environmental groups and some waste management companies who see this type of information as key to decision-making the decisions. Examples include: studying energy and CO2 emissions of waste management methods; drivers for waste minimisation and recycling, and comparative impacts between different materials.

Data and management of waste composition and arisings was raised by many participants as a priority area for further research. These views were expressed by those involved in managing or regulating waste, such as local authorities and waste management companies, who also want to see better systems for capture and analysis. A particular emphasis was placed on **commercial and industrial** waste streams, combined with construction and demolition and agricultural wastes. Participants also noted the need for further work on compositional analysis of waste and the need for further statistics on individual waste streams.

Research is also requested into new and existing **treatment technologies**; these include MBT, small-scale treatment plants, RDF, bioremediation, high temperature gasification, autoclaving, composting technologies, and anaerobic digestion. Such research should provide comparative data in terms of capital and operating costs, emissions, LATS performance, lifecycle impacts, recovery rates, carbon footprinting, energy conversion, residues etc. Composting and its effectiveness was another area of research interest. The need for quantification of the impact of landfill was also mentioned.

Markets for reclaimed materials was a further area of interest, including research into domestic markets for green glass, products derived from agricultural corps, recycling of street litter and manufacturing uses of residue.

Many responses related to the **social dimensions of waste** and resources management and prevention. Research needs included means of improving public participation, exploring links between LCA, lifestyles and consumer interactions, community waste sector engagement and empowerment and social inequality and promoting behavioural change of businesses and local authorities among other areas.

Health and environmental implications of waste operations and facilities was raised by participants and some proposed exploring key linkages with energy and sustainable consumption and production. **Economic issues** featured in the consultation with a particular emphasis on the true costs of processes and policy options both locally and globally. The need for evaluation of interventions, such as waste prevention initiatives was also popular.

Q13: What are the information gaps requiring waste management-related research in the short and long-term?

Group	Number of comments
Research around lifecycle and resource flows	48
Research different technologies	45
Research commercial and industrial waste	38
Coordination of research and findings	35
Accuracy and Collection of data	34
Research around waste composition	33
Public behaviour and social science research	31
Data on waste tracking and auditing	22
Market development issues	22
Research health and contamination issues	22
Research specific waste streams	22
Research around composting	21
Openness and access to data	18
Research Best Practice	17
The issue is implementation not research	16
Research recycling systems	14
Research true cost of collection systems	13
Research into minimisation	12
Research infrastructure needs	9
Research definition of waste	7
Research barriers to SMEs	4
Research reuse potential	4
Research variable charging	4
Set up pilot projects for review	4
Research community sector development	3
Research inert waste stream	3
Single body to overview waste research	3
Land use issues	1
Link to other policies	1
Refer to work or other groups	1
Research movement of waste	1

CHAPTER 4 – WASTE PREVENTION IN THE CONTEXT OF SUSTAINABLE CONSUMPTION AND PRODUCTION

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?

309 participants responded to this question. It elicited a long list of **types of materials and specific materials**.

Packaging and plastics (and in many cases plastic packaging) are seen as a self-evident priority for many participants from most sectors. Food packaging (plastic or otherwise) is particularly regarded as an increasing problem in the waste stream. Concern is expressed about the growth of packaging waste resulting from increasing internet shopping. It should be noted that a few responses, principally from producers and retailers, make pleas not to target packaging for reduction and minimisation, since they consider that drivers to recover and minimise packaging waste are already well developed.

Hazardous waste and materials containing **heavy metals** are also often mentioned. As with plastics and packaging, the contamination of reclaimable resources and the potential pollution and health dangers are seen as self-evident priorities to address.

Organic materials, and **food waste** in particular, are raised by similar numbers of participants. Food waste from households is regarded as a difficult as well as a growing problem. Other sources of food wastes are also mentioned, including wastes from hotels and restaurants.

Construction, commercial and industrial wastes are highlighted, primarily because they contribute such a high percentage of the total waste stream.

Waste Electronic and Electrical Equipment (WEEE) is raised as a priority product group, with considerable concerns about the delays in starting the WEEE scheme.

There are also references to **disposable (or single use) products** generally, and disposable nappies in particular, as being targets for prioritisation. It is suggested that reusable and returnable packaging should be encouraged.

Some responses suggest **criteria to help decide priorities such as**: the level of hazard in the material; the total life cycle impact of the material or product; the recyclability of the product or material; its reparability and/or durability; the quantity of waste: and whether it is biodegradable. Environmental impact as a criterion is generally supported by those involved in waste management (i.e. local authorities, waste management companies, and community recyclers), as well as being a key criterion for environmental groups. A number of participants also describe **methodologies for applying criteria**. Some observe that WRAP, EA and EU work should be used as the basis for setting priorities.

The table below shows other wastes that are mentioned.

Q14: What products and materials do you consider should be priorities for action to reduce waste and waste impacts?

Group	Number of comments
Packaging	92
Plastics	68
Hazardous waste and heavy metals	63
Organic materials and food waste	52
Construction, commercial and industrial waste	40
Criteria for deciding	34
WEEE	31
Disposable, one use products e.g. nappies	28
General comments	27
Furniture and bulky wastes	16
Junk mail and newspapers	13
Tyres	11
Agricultural sector waste	9
Paper and card	8
Research needed	8
Glass	7
Textiles	7
Wood	6
Oils	4
Metals	3
Mixed material products	3
Support proposed measures	3
Cars	2
Do not assume packaging is priority	2
Heaviest waste fraction	2
Mineral wastes	2
Composite materials	1
Litter	1
Non degradable materials	1

Waste within a coherent 'product life-cycle' policy

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

277 participants responded to this question. There is a strong perception across all sectors that an extended conception of Producer Responsibility, including tougher enforcement, is key to the solution here. There is also strong **support** for reducing waste and making better use of resources, with interest in **eco-design initiatives** such as funding for **research and development**, running **competitions** and **partnership working** with organisations like the Design Council and professional institutions.

Packaging design is raised as a particular area where more work could be done, with some suggesting the need for a **regulatory framework** around packaging. Other suggestions include product design to increase **durability, dismantling, and recyclability**. There is support from the waste industry and local authorities for the dismantling of packaging to be considered at the design stage enabling, for example, the use of single material packaging to increase the ease of separation through the use of autosort equipment. From the community and environmental sector there is in particular a call for more emphasis on **durability**, with producers required to offer longer-life guarantees, and awards and charter marks for products designed to last longer. It is suggested that advertisers could make a virtue of the longevity of products, and that advertising of throwaway

convenience should be discouraged. However it is suggested by some respondents that a move towards better-designed and more durable products could be costly overall for manufacturers and consumers.

The standard and form letters ask for legislation to control packaging, including severely reducing packaging that cannot be recycled or composted in practice because while the technology may exist, there are no local collection services or reprocessing facilities.

A large number of participants suggest taking a strategic approach to product and product design by evaluating the **total lifecycle** of materials to ensure products maximise resource efficiency. There are a number of responses that stress **exploiting consumer demand**, rather than introducing new legislation, is likely to be the only successful way of encouraging good product design in terms of recycling and use of recycled materials. Others suggest **fiscal incentives** for recycled goods, along similar lines to the Aggregates Levy.

Some respondents suggest that **standards and labels** should be introduced to make the true environmental and financial costs of manufacture more apparent to consumers. Some suggest that only action at international level on standards will achieve significant change. **Product design awards** are also suggested.

Q15: What is the scope for reducing waste and achieving more efficient resource use at the product design phase?

Group	Number of comments
Design for dismantling and recycling	58
Support eco-design initiatives	47
Particularly packaging design	34
Increasing durability of products	33
Generally feel there is a lot of scope	30
Consider product life cycle / life cycle analysis	27
Consider market forces / conditions	26
Use tax incentives / penalties	22
Extended producer responsibility	20
Involve all stakeholders	19
Set regulations / requirements	19
Set targets and incentives	15
Consider zero waste principles	8
Focus on plastics	7
Information labelling	6
Little / limited Scope	6
Avoid composite materials	5
More information needed to respond	3
Consider product need to be fit for use	2

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

267 participants responded to this question. Broadly speaking, most participants support the idea of either product labelling or product information provided at point of sale. The main caveat is that this needs to be **clear, concise and unambiguous**.

There are some differences, however, around the real value of this information and exactly to whom it should be directed. The waste industry tends to think there is some scope for more information, but more for how material should be separated, recycled and disposed of than to affect initial purchasing decisions. The local authorities and recyclers are much more bullish on this point, stressing for example the value of **telling consumers exactly what is recyclable in most areas** (particularly regarding plastics), what is compostable, and what is most likely to end up as residual waste - in the

belief that this latter information will begin to affect consumers' purchasing decisions. This would most likely be effective if at the same time Defra signalled higher packaging recovery targets and pursued producers who use non-recyclable packaging.

There is an acknowledgement by some that a simple **recycling logo** does not necessarily mean the product is recyclable, for example if no local facilities are available. The proposal to provide **waste profiles** is largely supported, while some participants feel this should be extended to cover **full lifecycle issues**.

There are many ideas about what form information or labelling should take. These include:

- Something similar to the energy rating system
- Red, amber, green labels
- Life cycle information
- Telephone numbers of advice lines that let participants know where they can recycle the product.

Those who **challenge the value** of greater waste related information argue it could be **confusing to consumers**; that the **issues are too complex** to simplify down to product labels; that local **facilities for recycling are not consistent** across the country; and that there is insufficient evidence about the effectiveness of driving consumer behaviour in this way.

Q16: What is the scope for improving the amount of waste-related information provided about products placed on the market?

Group	Number of comments
Product labelling	111
Clear concise information	70
Challenge the value of doing this	53
A lot of scope	26
Comment on waste profiles	25
Advertising and media work	18
Take a life cycle approach	17
Needs to be legislated for	15
General comments	6
Phone / web based information	5
Research if this changes behaviour	1

Product and resource re-use

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

282 participants responded to this question. The range of suggestions is listed in the table below. On the whole participants **support the stimulation of re-use and remanufacturing**, and a lot of participants suggest **fiscal tools**, such as a virgin material tax and exempting VAT on refurbished goods. There is support for the work of the BREW Programme, although some respondents feel that it does not go far enough in this area. Some respondents suggest establishing reuse warehouses.

There are some differences of opinion in the waste industry as to whether this can be best achieved through regulation, or whether it is a matter of **education plus the operations of the market**. Other sectors point out that encouraging industry to **standardise components** would lengthen the life of many products as well as making disassembly and re-use easier.

Other suggested interventions by the Government include: **supporting community schemes** to extend their expertise; revising the definition of waste to make it easier and cheaper for re-use and re-manufacturing organisations to operate; including the re-use option in recycling credits; developing

re-use targets, and relevant legislation and guidelines such as a Re-use Best Value Performance Indicator for Local Authorities.

Those who **challenge the viability** of stimulating greater re-use and re-manufacture do so largely on the grounds that getting participants to shift their behaviour and accept refurbished or second hand goods is unachievable. There is a feeling that considerable **educational and marketing effort** will be needed to get participants to accept these goods and to change their behaviour. Those advocating a zero waste approach, both online and in standard and form letters, suggest a role for a Zero Waste Agency in promoting resource efficiency.

Q17 What are your views on how re-use and re-manufacture could be stimulated further?

Group	Number of comments
Use fiscal tools	69
Support reuse and refurbishment	59
Support community schemes	25
Educate consumers to accept	24
Challenge value / viability of doing this	22
Review the definition of waste	18
Include reuse in recycling credits	17
Waste exchanges and online data	17
Legislation and guidelines	16
Develop reuse targets	15
Design issues	11
Develop a re-use BVPI	11
Specify in procurement process	11
Market development	9
Engage with industry	8
Producer responsibility	8
Support remanufacture	8
Via marketing	7
Generally feel there is more scope	6
Support NISP	5
Take back schemes	5
Develop resource recovery parks	3
Community involvement	2
Develop lease / hire systems	2
Take advice from experts	2
Set up re-use task group	1

Engaging business to improve resource efficiency

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

264 participants responded to this question. One common answer is that this comes under the heading of Producer Responsibility. **Financial penalties and incentives** are cited most often as the best way of stimulating action, particularly by local authorities and the community recyclers. Suggestions tend to be around increasing landfill, variable levels of VAT, a virgin material tax and other forms of regulation and incentives.

Advice and support from a variety of organisations is also regarded as important. Suggestions include WRAP, Envirowise, BREW, NISP, Business Links, local authorities and trade associations. There is also support for the use of case studies and examples that help companies make a business case for their own organisations.

A number of participants stress the importance of helping business see how **good resource management** is also good business management and can have a positive effect on the bottom line. Particular reference is made to support of this kind for SMEs. The waste industry pays closer attention to why and how producers produce as they do. For example, as one participant from the waste industry points out, most manufacturers will find it very hard to move away from the conventional 'batch and queue' process of mass production, and will need considerable help to move to leaner production techniques. It also essential that the **supply chain** as a whole is understood and the need for resource efficiency made clear from the design stage onwards.

A substantial number of participants refer again to the need for **legislation** to enforce new **standards or targets**. Examples include a parallel with building regulations, and mandatory targets for recycling and recovery. Various responses stress the need for adequate provision of **waste infrastructure** for the recycling and recovery of commercial and industrial waste, especially for SMEs.

Some responses refer to particular **sectoral approaches** that have had some success in preventing business waste, such as the EU-funded HAZRED project, which ensures that businesses comply with environmental regulations while gaining financial benefits; and Site Waste Management Plans, which encourage constructors to consider how they can manage site waste more efficiently.

Q18: What are the best ways of stimulating business action on resource efficiency, including waste prevention?

Group	Number of comments
Financial penalties / incentives	129
Advice, support and networks	126
Statutory controls	50
Develop clear business case	40
Advertising / publicity	35
SME support	24
Facilities and infrastructure	23
Markets and competition	19
Targets	19
Tackle supply chain	17
Learn from existing initiatives	13
Research and innovation	12
Require reporting	11
ISO / EMAS / BS accreditation	8
Voluntary initiatives	8
Employee engagement	6
Contains responses to other Qs	4
Other comments	3
Criticism of BREW	2
No action required	2

Encouraging SMEs to reduce waste

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

239 participants responded to this question. The table below lists the range of ideas suggested. The most commonly suggested mechanism across all sectors is via **support, advice and information**. Schemes provided via Envirowise, NISP, and BREW are regarded as positive and able to provide lessons for future action. A few respondents question whether the approach of BREW, in particular the number of delivery bodies, best serves SMEs. Some respondents suggest that business advice schemes could be better linked to local authority advice mechanisms. Some see an increased role for the voluntary and community sector.

There is strong support for using existing business networks, such as Chambers of Trade, to pass on advice. Some see a role for business champions. Messages need to be simple and advice needs to **focus on the savings** that can be made, how **resource efficiency** can be achieved and the **facilities** that are available. A number of suggestions refer to the need for **site visits** and **direct, ongoing support** from advisors.

A significant number of responses talk about fiscal **incentives or regulatory measures**. For some this means increasing the **landfill tax escalator**, including making the costs more explicit, so that businesses are incentivised to find alternatives. Some suggest using the funds generated to provide for free or low-cost disposal of separated recyclable material from SMEs. Other suggestions include providing **grants and start-up support** for companies who provide services for small businesses. Some respondents suggest that Duty of Care and other requirements should be better policed. One participant suggests that farm waste reduction should be made a future requirement of the single farm payment scheme. However some business respondents urge caution over measures that have the potential to increase bureaucracy and costs.

Several respondents suggest that local authorities have a strategic role to play in infrastructure provision and advice, and therefore they need adequate funding and powers. It is suggested that the definition of municipal waste should be amended to encourage local authorities to target recyclables from small businesses. Another suggestion is to provide a licence for the smallest SMEs to use civic amenity sites without being charged commercial rates.

Q19: How can resource efficiency, including waste prevention, be stimulated among SMEs in a way, which does not incur disproportionate costs?

Group	Number of comments
By providing support, advice and information	76
By using fiscal incentives and/or regulation	43
Through schemes such as BREW and Envirowise	24
By encouraging networking and partnerships	21
By providing appropriate facilities and collection	16
By offering tangible savings/benefits	12
By encouraging adherence to clear standards	7
By encouraging champions/individuals	6
May be difficult or impossible	6
Avoid bureaucratic burdens	5
By raw material levies	5
By using a Zero Waste approach/agency	5
By coordinating roles and messages	3
By replicating success stories	3
By requiring environmental statements	3
By charging for waste collection	2
By facilitation of co-collection/processing	2
By grouping SMEs	1
By introducing a packaging return scheme	1
No role for government	1
Through programmes tailored to needs of SMEs	1
Through use of targets	1

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

243 participants responded to this question. There is a strong sense that these types of organisations could all work together to **provide support and advice**, including in-depth advice from

advisors doing site visits, training and guidance materials as well as **sign posting** businesses to service providers. Respondents suggest that the following organisations could play a role:

- local authorities (working through, for example, waste services, trading standards, business support teams, local business partnerships, environmental health officers and Waste Disposal Authorities). Some respondents suggested that local authority work should be separate from Municipal Waste Management functions, e.g., through economic development services;
- Business Links;
- Regional Development Agencies;
- trade organisations, Chambers of Commerce, National and Regional Trade Associations;
- the Environment Agency;
- the DTI;
- banks;
- the Small Business Service; and
- professional publications.

Case studies and examples of similar businesses having taken action are suggested, combined with helping **small businesses to network and work in partnership** with other organisations. There is also frequent mention that whoever provides this service will require **sufficient resources**. A few respondents suggest that redistributing a proportion of the landfill tax – possibly through the BREW Programme – could provide a source of funding. Caution is urged over the potential of public funding creating competitive distortions in areas of existing activity.

Some responses suggest that joint working is not always embraced, and that there is great scope for engaging SMEs by **involving social enterprise/community recycling organisations**, if barriers, such as organisations not fitting within current funding arrangements, can be overcome.

There are some clear differences of emphasis between sectors. Broadly speaking, the waste industry seems to think there is already a wealth of advice and support organisations in this area, and that more initiatives are not needed. Some respondents suggest that the existing delivery structure should be simplified and that monitoring and evaluation of the support provided should be improved. A limited number of respondents go further, and question the value of existing business support services. The counterargument is also presented; that a range of business support activities is needed to help ensure that advice is properly tailored.

There is also clearly some scepticism about **how effective local authorities are in this role**. This perception is shared to some extent by the voluntary sector, not least because of local authorities' and Business Links' reluctance to recognise the role of social enterprises, with the result that social enterprises slip down the cracks between the private and public sectors. Local authorities, for their part, see their role as pivotal, and there is much talk of coordinating. There are various calls for local authorities to provide waste services for small businesses, such as collection services and transfer and bulking facilities. Some respondents suggest that business rates could provide a source of local authority funding.

It is suggested that local authorities currently have little incentive for engaging with small businesses on waste management, and vice versa. Suggestions to encourage greater engagement include:

- fiscal measures, regulatory controls and environmental ratings, with spot fines to finance enforcement activity;
- targets;
- regeneration and business grant application forms asking for environmental impact;
- procurement practices requiring all suppliers to local authorities and Business Links to have waste reduction policies in place;
- unifying disposal and collection of waste;

- using local authority business rate mailings to put across the resource efficiency message to businesses; and
- resolving policy conflicts that discourage local authorities from collecting commercial waste.

It is suggested that **waste exchanges** should be established within local authority or county areas, with the purpose of trading furniture and other materials. Purchasing schemes could also be established.

It is suggested that **service businesses** that provide resource efficiency, such as nappy laundry services, hire shops and book and toy libraries, should be supported through start-up and in the medium-term.

It is pointed out that small businesses generally have a **problem with on-site storage of wastes**. It is suggested that the provision of dedicated areas on small business and industrial parks could enable higher recycling targets to be achieved. It is proposed that such areas could be managed by the landlord or Chamber of Trade.

Q20: What role should Business Links, local authorities or other organisations play in engaging small businesses?

Group	Number of comments
Provision of advice and support	56
Signposting, gateways, information and education	42
Coordination of activities	26
General comment	23
Provision of waste services	21
No or very limited role	16
Providing forums, networks and partnerships	15
Establish waste as integral business issue	10
Peer advice	7
Encouragement, leadership and promotion	5
Set up range of schemes	5
Promotion of re-use/recycling	4
Role of voluntary organisations/social enterprises	4
Establish procurement practices	3
Creation of targets/ratings	2
Introduce fiscal measures	2
Refer to Envirowise	2
Identify solutions to food waste	1
Work with individuals	1

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?

240 participants responded to this question. On the whole there is **support for a sectoral approach** to waste prevention, particularly from local authorities and environmental groups, who see the opportunity for a generally more sophisticated, carefully targeted approach. There is also support for the work WRAP is doing in identifying particular sectors (such as food retail). **Some participants support the sectoral approach, but do not favour target setting.**

Comments on **how to implement targets** include **support for reduction targets**, and the need to have a better **understanding of the data** around waste arisings for different sectors so that some

form of **prioritisation** can take place. However, there are also those, for example in local authorities, who consider that targets could be set even in the absence of data. Participants suggest that the **most polluting sectors**, such as those producing hazardous wastes or those with **the highest environmental impact** (e.g. aluminium) and those that produce the **highest volumes of waste**, should be prioritised.

A number of participants consider that **mandatory targets will be required** since they feel voluntary ones will be unlikely to succeed. Those who do **challenge the approach** sometimes do so because of a preference for a **materials rather than sector** focus. There is some concern that there should be **flexibility for different sectors** to be treated differently (for example, the agricultural sector).

There are mixed views from large waste management companies: some support the sectoral approach and want it calibrated to easy wins; others argue that a sectoral approach would only be realistic for large, mature consolidated sectors, or that a market based approach is preferable - regulatory and pricing signals work better than targets.

Some responses ask for clarification and consistency in the use of language - for example the difference between reduction and prevention.

Q21: What are your views on developing a sectoral approach to waste prevention including setting waste reduction targets?

Group	Number of comments
Support for sectoral approach	107
Making a sectoral approach work	52
Mandatory targets	23
How to make targets work	21
General comments	14
Questions/concerns arising	14
Prefer other approaches	13
How to set the right targets	12
How targets might backfire	10
Comments on sectoral targets	9
Oppose sectoral approach	9
Voluntary/aspirational targets	9
Reference to SMEs	5
Oppose targets	3
VCS-centred approach	3
Match targets with funding	1

Reducing environmental impacts of consumption

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

292 participants responded to this question. **Education, information and awareness** are cited most often as the best means of engaging consumers. There is a view that this needs to be linked with issues around **sustainable consumption** and **real cultural change** in terms of attitudes to waste, re-use and prevention. The public and voluntary sectors in particular focus on waste prevention and the need for vigorous action to persuade consumers to buy only what they really need, and for government to alert participants to the problems inherent in mass consumption and its environmental impacts.

However, quite a significant number of participants feel that reducing waste is an **issue for producers** on the basis that, until the marketing and development of wasteful and disposable

products is halted, little will change. The need to put pressure on retailers and other suppliers is echoed in the standard and form letters.

One issue that recurs constantly is **variable charging** for household collections and **charging to use civic amenity sites**. Variable charging is recommended in the standard and form letters, and there is support for it from the voluntary sector and the local authority sector. Support for variable charging is not universal in the waste industry: some suggest separating out the cost of waste disposal on Council Tax bills may be a better first step.

Of the other suggestions for engaging consumers to reduce waste, a few refer to **financial penalties** such as charging for plastic bags, while most focus on **recycling** rather than reduction. This may indicate the difficulty perceived in identifying facilities or actions for householders to reduce waste, beyond a change in their consumption patterns and attitudes. The latter might be achieved by wider use, according to the voluntary sector, of schemes such as **charging deposits** on bottles and cans - something which used to be commonplace and can be demonstrated to boost hugely recycling rates as well as encouraging generally more responsible attitudes to consumption. Such **ready yardsticks** can also help participants feel more able to take such responsibility.

This approach is also supported by some in the waste industry, to the extent of suggesting that differently packaged products could be differently priced.

Q22: How do we best engage consumers to reduce waste?

Group	Number of comments
Education and awareness-raising	149
Household/variable waste charging/targets	55
Fiscal measures	40
Suggestions	36
Incentives and penalties	34
Focus on producers as well as/instead of consumers	26
Make waste reduction/recycling easier	25
Promoting culture change/social pressures	14
Leadership	11
Consistent messages	10
Re-usable nappies	9
Statutory intervention	8
Encourage home composting	6
Ref to RecycleNow	5
Disagree with review	4
Fortnightly collection	4
More local communication projects	4
Oppose variable charging	3
Use the NWRF Waste Prevention Toolkit	3
Criticism of Environment Direct	2
Partnerships	2
Ref to Sustainable Consumption Roundtable	2
Institutional change	1
Support measures identified	1
Treat small businesses as consumers	1
Very difficult, low priority	1

CHAPTER 5 – RECOVERING RESOURCES FROM WASTE

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?

298 participants responded to this question. A great many refer to Question 2 (national recycling and composting targets). There is general support for **statutory performance standards and targets, spread across most sectors including most local authorities, environmental groups and waste management companies**, both to drive performance and to encourage high and consistent standards and aspirations.

Support is based on experience that SPS and targets **ensure resources are allocated, and perception that targets have raised recycling rates in recent years**. There are those, notably in the voluntary sector, who feel that targets have never been sufficiently ambitious, and that whatever targets are adopted should at least match those in the Landfill Directive. However, resource needs should be recognised and penalties must be clarified. The suggested **timescale and target percentages vary**, from 5 or 10 years ahead, to 30, or even 50 years ahead, with regular reviews.

Reservations around targets are expressed by some who feel that targets can **create a false market** for recycling, that different local authorities have different circumstances and that therefore each authority needs to have its own **local targets**. Others feel that **LATS is sufficient** to drive local authorities to recycle and compost more, and there are suggestions that local authorities be allowed to trade performance as with LATS. Some local authorities want to move away from SPS towards statutory minimums.

The standard and form letters also suggest that local authorities will need to run more comprehensive and professional recycling and composting services if performance is to be improved.

Q23: 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?

Group	Number of comments
Agree with setting performance standards	205
Timescale / Level	169
Reservations around targets	57
Issues for composting	20
Achieving the standards	18
Other	16

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

This question refers to 18a: making standards materials specific (or excluding organic materials); and 18b: providing some incentive for reducing waste.)

248 participants responded to this question. A few participants **support both** of these proposed changes. Most participants, however, express a **preference for one** or the other, expressly **disagree with one** or the other, or disagree with both. The waste sector and local authorities tend to challenge both options on the grounds that both could lead to a much more complex audit trail, which would also need investment in infrastructure. Where a preference was expressed by these sectors it is for 18a.

Those who **support 18a** tend not to provide much explanation as to why, while stressing the need to separate biodegradable waste from other wastes.

More participants **disagree with 18a** than support it. The reasons include the likely increase in **complexity** and **proliferation of targets**, and the fact that schemes would become increasingly **inflexible** and disallow any local variation. Others suggest that the current **lack of infrastructure** for many materials does not make this practical in the short term, and that excluding organics might reduce the incentive to divert these materials from landfill. There is a feeling expressed by some that dealing with specific materials is a **producer responsibility** issue and not a local authority collection issue.

Far more participants **support 18b** than oppose it. Environmental organisations and the community sector are particularly enthusiastic about 18b on the grounds that it seems far more logical to measure waste collected but not recycled as the yardstick for improvement. This argument is backed up by the concern that there is a tendency to reach recycling targets by collecting more green garden waste rather than by extracting more materials from the waste stream. Some suggest that this could be achieved **by measuring kg/household of residual waste collected, kg/household of recyclable waste collected, and total waste collected**. Targets could then be set to reduce residual and total wastes, thereby acting as an incentive to promote waste reduction.

Those who **disagree with 18b** do so for a number of reasons. They cannot see what **practical effect** it would have; even if you set targets, there are **limited steps** local authorities can take to reduce waste arisings; and such a target would be difficult to set and monitor since it would have to be set against **waste and population growth in an area**.

Q24: What are your views on the possible changes to the design of the standards suggested above?

Group	Number of comments
Support or consider 18b	86
Disagree with 18a	59
Other options for changes	54
Support or consider 18a	48
General comments on minimum standards	40
Disagree with 18b	22
Support suggestions	14
Disagree with use of minimum standards	6
General comments on waste management	4

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

(This question referred to two main options: 19a, setting minimum performance standards only; and 19b, making special arrangements in two-tier county areas.)

242 participants responded to this question. Those participants who **support option 19a** feel minimum standards are reasonable providing they are **not set too low**, and some suggest setting **different targets for rural and urban areas**. On the whole local authorities and the waste industry sector support minimum targets since it sets a clear guide for investment in infrastructure. Reservations around 19a are largely because respondents feel that minimum standards could easily become maximum standards for **poorly performing authorities** and that there will be little **incentive to improve** above the minimum. These views tend to be expressed by some local authorities but mainly by environmental groups and community recyclers. Some suggest that minimum standards should be set alongside individual standards that can be more sensitive to the socio-economic aspects of an area.

For option **19b**, the great majority from all sectors who express an opinion **support the idea of making special arrangements** in two-tier county areas. They are felt to allow **flexibility, encourage partnership working, agreements and joint contracts**. There is a view expressed by some that pooling should remain **voluntary**. Those few participants who express **reservations around pooling** feel this should **not be a requirement**; one view is that less well performing authorities could do little and ride on the backs of better achieving authorities. There is also a sense that achieving consensus between collection authorities is difficult.

The standard and form letters make the point that flexible and local waste solutions should be encouraged in accordance with the proximity principle, and to allow new, more efficient technologies to be implemented as they emerge e.g. micro-generation (based on anaerobic digestion).

Q25: What are your views on the possible changes to how standards should apply to local authorities suggested above?

Group	Number of comments
Support or consider option 19a	75
Support or consider option 19b	70
Reservations about / oppose 19a	55
General comments on standards/targets	29
Additional / Alternative suggestions	23
Reservations about / oppose 19b	15
General comments on two tier authorities	7
Generally support proposals	7
Involve stakeholders	7
Generally oppose proposals	4
Comments about Energy from Waste	1

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?

356 participants responded specifically to this question. In addition a total of 3432 standard and form letters and e-mails were received which focused on **opposition to using Energy from Waste** (in particular incineration) as a means of diverting waste from landfill. These letters and emails also make various suggestions on how to better manage England's waste.

While this large number of standard and form letters oppose EfW, the majority of non-standard responses take the view that EfW has a **realistic place in the waste hierarchy**, recovering energy from materials that cannot be recycled. Most local authority responses are strongly supportive, as are most of the larger waste management companies. The majority of those who express support do so with the caveat that it **should not have a negative impact on recycling targets**.

Supporters of EfW generally acknowledge that plants have a bad press and that there is significant **public concern** around the incinerators, often taking the form of NIMBY campaigns. They suggest that **more effort** needs to be put into addressing these concerns, particularly by central Government.

Both supporters and opponents of EfW want the most up to date information on the various technologies to be made public to enable an **open debate**. This would need to cover issues such as the net energy derived, the CO₂ footprint and the health impacts of the various technologies, to allow comparisons with other reprocessing/disposal options and so more informed choices to be made.

Online objections to EfW are particularly from environmental and community organisations, but also from some local authorities. **Opposition to EfW** is based on the following arguments, both in online submissions and in the standard and form letters:

- Concerns around human health from emissions from EfW incinerators
- Concerns about the waste of resources when materials are burnt and an anxiety that incineration will detract from recycling
- The CO₂ emissions from incinerators
- Dioxins and other air pollutants
- Ash and its final disposal
- The large capital costs involved leading to long-term contracts and disincentives to look for alternative solutions, which in turn discourages waste reduction
- The necessary scale and location of plants leading to significant planning problems
- Incineration having been defined as a disposal not recovery option by the European Court.

Some of the **solutions suggested** by participants looking **for alternatives to EfW** include:

- Set higher recycling targets.
- Focus on reduction targets
- Introduce an incineration tax
- Introduce variable charging
- Enable small-scale flexible solutions at a local level
- Limit disposal contracts to 10 years.

Anaerobic digestion is considered by many to be a **far better EfW technology**, and one that is **not given proper consideration** in the consultation document. **Other technologies** are also considered by some to be worthy of greater consideration, such as MBT with RDF, the use of CHP, pyrolysis, autoclaving, plasma gasification, and hydrogen and ethanol production. Some responses specify a preference for incineration technologies that recover heat as opposed to energy on the basis that they are more efficient.

Q26: Do you have any comments on the proposal to encourage the diversion of wastes from landfill to Energy from Waste?

Group	Number of comments
Support this proposal	198
Challenge this proposal	83
Address public concerns	58
Consider anaerobic digestion and composting	40
Concerns around health and pollution	35
Length of contracts and capital issues	30
Concerns around resource use issues	29
Choosing the right technology	28
Scale, location and planning issues	24
General observations	8
Address definition of waste	2
Criteria for acceptability	1

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?

292 participants responded to this question. Essentially, this question follows on directly from Question 26. Slightly more participants express a **preference for MBT/RDF**. Reasons given include: the potential for plants to be on a smaller scale; they can be sited away from communities; are more publicly acceptable; they use systems that are better able to divert reclaimable resources into recycling; they are more fault tolerant, cleaner than direct incineration and are more energy efficient.

A lot of participants, including most local authorities, **express no preference**, but feel that more information is needed to make an assessment as to what would be appropriate depending on local circumstances, for example information on net energy derived, CO₂ emissions, proportion of biomass and CHP. A number of drivers are mentioned such as lead times for construction, cost, markets for outputs and how waste is collected (e.g. mixed waste might imply the MBT route, while source segregation collections would leave residual more suited to direct incineration).

Slightly fewer participants express a **preference for direct incineration**. This is regarded as being a simpler, proven technology, whereas the markets for RDF and MBT products are volatile and unreliable, as is the performance of RDF plants. Waste management companies vary in their responses, but generally support the need for local authorities to make their own informed decisions.

Some participants, especially community recyclers and environmental and voluntary groups, **challenge both** of these technologies as inappropriate and prefer others, in particular **anaerobic digestion**. However, there is also some acceptance of a role for MBT as a suitable alternative to incineration to pre-treat residual waste before landfill to minimise problems from fermentable organic matter.

Q27: 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?

Group	Number of comments
Prefer MBT/RDF	75
A mixture of both or no preference	62
Prefer direct incineration	53
Consider Anaerobic Digestion	37
More research / communication needed	21
Other technologies	14
General comments	5
Relationship with recycling and minimisation	4
Consider gasification/pyrolysis	3

The future of landfill

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

310 participants responded to this question. The great majority of participants from all sectors clearly **agree with this proposition**, with some **concern about how long** it will take to achieve and the **investment in infrastructure** that will be needed to achieve it. On the whole environmental groups and the community sector are clear that phasing out landfill should be aspired to as part of a zero waste target and as such stress that ash from incineration would mean this aspiration will never be met. The waste management sectors and local authorities tend to focus more on the removal of biodegradable wastes from landfill.

However, some participants do challenge this proposition based on it being **too prescriptive**: landfill could be a place for **bio-stabilized or separated material**, some **hazardous wastes**, and as a means of **restoring** minerals workings. This challenge comes from waste management companies but also some environmental groups whose motivation is to reduce waste to zero.

The **gas** that can be generated from well-managed landfill sites is regarded by some **as a benefit**. In some particularly **remote locations**, landfill may continue to be the best option.

Many participants from across all sectors feel that landfill will be with us for the foreseeable future and that our **landfill sites will need managing for many years** to come.

Q28: Should landfill eventually be the home of last resort taking only non-biodegradable residues from waste treatment?

Group	Number of comments
Support this view	164
Challenge this view	36
Yes but will be needed for foreseeable future	36
Yes, with a few exceptions	28
Yes but strive for no residues	25
Need other technologies /infrastructure first	23
Comments about particular waste streams	12
Yes but need to manage for the long term	9
Yes once there are markets for materials	8
Yes but segregated landfill acceptable	4
Landfill preferable to incineration	3

Procurement of waste management services

Question 29: Views are invited on the proposed actions to improve waste procurement, and how to take them forward

267 participants responded to this question. All sectors recognise the **need to improve procurement** and there are a variety of specific proposals for doing this.

One message that comes across mainly from the environmental and community sectors and some local authorities is that **PFI tends to favour large contractors** and this leads to the preclusion of SMEs and community groups as well as smaller scale solutions. One solution would be to **encourage sub-contractors**. The waste management sector also argue that PFI needs to be reformed, the whole **procurement process is** perceived by some to be **too long and too complicated**, and needs to be made shorter and easier. This leads to suggestions for the development of **new procurement models** – such as a multi contract approach; an alliance/collaborative approach; and traditional D&B with direct service provision. **Stronger regional coordination** would also help the right decisions to be made.

There are also ideas to support those having to make **procurement decisions**, for example the production of decision trees and an investment toolkit that will help local authorities to analyse their investment options in the light of different demands and circumstances.

The **key issues of concern** raised are around market confidence and bankability, risk planning, long-term versus short-term contracts, and the standardisation of contracts. Some participants highlight the fact that recycling operations and the waste industry are being regarded as a single industry, while there is, in fact, great diversity, from small community schemes to multinational companies.

In the standard and form letters, those advocating the adoption of a Zero Waste Charter want to see waste planning opened up to greater public participation and an end to commercial confidentiality for waste contracts.

Q29: Views are invited on the proposed actions to improve waste procurement, and how to take them forward

Group	Number of comments
Improving procurement procedures	63
General comments	59
Support the proposed approach	26
Enable community sector to participate	19
Questions arising from the proposed actions	19

Concerns around PFIs	18
Proposals inadequate	18
References to LATS	13
Planning issues	11
Preference for smaller facilities	10
Concerns about large/long-term contracts	9
Procurement partnerships	9
Enable small businesses to bid	8
Fiscal measures/incentives	6
Enhancing competition	5
Need to reduce procurement timescales	5
Procurement skills	5
Roles for Regional Centres of Excellence	5
Risk management	4
Barriers to new entrants	3
Hazardous waste management	3
Role of the community sector	3
London Waste Plan	2
Using procurement to encourage specific approaches	2
Benefits of long-term contracts	1
Failures of consultation	1
Getting added value from waste contracts	1
Investing in procurement	1
Involvement of major companies	1
Need for accurate data	1
Need to increase/speed up investment	1
Shared treatment facilities	1
Zero Waste	1

Delivering the market capacity for recycled materials

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

283 participants responded to this question, in particular **how waste is defined and categorised**, and when it is regarded **as a resource** rather than a waste. Various respondents suggest that this issue, which is common to many sectors, can be addressed by means of clearer **quality standards and protocols**.

Respondents also suggest that the development of markets for recycled materials can be accelerated by **setting targets** and requiring some materials to consist of a **minimum percentage of recyclate**. However there is some concern from the waste industry that government can only tinker at the edges of this market without falling foul of competition laws.

This needs to be coupled with a resolution of the issue that runs through many responses: **how waste is defined and categorised**, and when it is regarded **as a resource** rather than a waste. This also is common across all sectors.

Various respondents suggest that public sector procurement requirements should specify high levels of **recycled materials** in procured products to drive the development of this market. Overall, respondents were in favour of on-going Government support of WRAP in its role of **developing markets** for recycled materials.

Overall, there seems to be some sense that all the obvious things are already being done, and that the need now is to maintain and expand support for them.

Q30: What more could the government do to accelerate the development of markets for recycled materials?

Group	Number of comments
Fiscal measures and incentives	82
Review waste/resource definitions/categorisations	55
Encourage green procurement/specifications	50
Ensure quality standards/protocols	33
Market development support	31
Support market development organisations	28
More research/information/coordination	16
Education and promotion	12
Legislative intervention	11
Develop reprocessing capacity	9
Funding, grants and subsidies for projects	9
Improve sorting of plastics	9
Investment in innovation	9
General observations	8
Reduce/remove regulatory obstacles	8
Targets	7
Challenge the premise of market acceleration	6
Percentage of recycle on packaging	6
Support	5
Tighten export controls	4
Avoid undercutting market activity	3
Design/create markets for re-use	3
Enforcement of regulations	3
Questions arising	3
Mistakes	2
Product labelling	2
Provide clearer regulatory framework	2
Use life cycle analysis	2
Develop long-term strategies	1
Expand producer responsibility	1
Zero waste	1

Imports and exports

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

215 participants responded to this question. The answer for participants in all sectors comes down to a question of **enforcement** of the existing regulations, particularly **Duty of Care**, together with an expansion of **policing, monitoring and prosecuting** those who abuse them. Not everyone, however, thinks that there are yet sufficient regulations governing this trade and some do not believe that any amount of regulation or even policing will improve compliance. Some highlighted the potential of illegal exports to undermine public confidence, and participation, in household recycling schemes.

There is also opposition from some in the voluntary and community recycling sectors who see the export of mixed waste as a **barrier to the creation of a secondary materials industry** in the UK. Others believe the export of waste should only be allowed if Duty of Care includes a fully audited supply chain.

Better liaison with countries receiving our waste is part of the answer for others, along with a **clearer framework** for what is and is not allowed. The use of the **Waste Data Flow** system is advocated by some to help with police the export of waste, as is the Recycling Registration Service backed by Defra and the Environment Agency and managed by BSI; the waste industry is also introducing an accreditation scheme for producers of recycle who use the export market in the belief that this will deal with both material quality and export documentation issues.

There is also a view in the waste industry, not apparently shared by others, that there is little chance of the UK meeting its Packaging Waste Directive obligations without increasing its exports of recovered secondary materials. There is a perception that this is being stymied by those within the Environment Agency who interpret unrealistically the rules governing the export of recovered materials.

Other respondents focus more on the **nature of the waste** we export, with some saying that certain types of waste, such as **hazardous waste**, should never be exported to countries that do not uphold similar health and safety standards to ours.

Others believe that only properly **segregated waste** should be exported, while some go further and argue that there should be a total **ban** on the export of any waste. This is for a number of reasons in addition to those already mentioned: avoiding the **environmental impacts** of transport, for example, and because the export of waste undermines support for the development of our **domestic recycling capacity**.

Q31: How can we improve compliance with the controls that apply to the export of waste for recycling?

Group	Number of comments
Stricter policing, enforcement and prosecution	66
Enforce Duty of Care with auditable data	31
General observations	26
Resource the regulators	25
Liaise with/check on destination countries	15
Develop home reprocessing capacity	13
Develop/enforce common quality standards/protocols	11
More/clearer rules and regulations	10
Avoid/ban waste exports to some countries/entirely	9
Better guidance/management/coordination	8
Not a role for local government	7
Potential for the Waste Data Flow system	7
Clarify definition of waste	5
Segregated waste only to be exported	5
Challenge the need to do this	3
Levy on waste producers to monitor compliance	3
Questions arising	3
Producers to provide full description of waste	2
Support suggestions in consultation document	2
Closer relations between industry and regulators	1
Establish quality assurance systems	1
Fiscal incentives and penalties	1
Remove the ability to issue PERNs	1
Set up Zero Waste Agency	1

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

237 participants responded to this question. While there is **support for developing and encouraging domestic capacity** rather than relying on overseas markets, there is also strong recognition of the international nature of recyclates markets. A number of reasons are put forward to support the development of domestic capacity, including the **proximity principle**, the desire to be **self-sufficient**, and concerns about the **fluctuating demands and uncertainties** inherent in serving overseas markets. Commentators recognise that if the domestic market is to play a significant role in recycling then there is a need for major investment and Government support to do this.

Significant numbers of respondents believe that this balance will anyway be set by **market forces**, and there was recognition that there is a balance between domestic capacity and the need to **export** certain types of wastes because of a lack of domestic capacity and technological development. This is the argument made by participants from the waste industry; the only variation, shared with some local authority respondents, being the extent to which we should allow ourselves to be vulnerable to the **vagaries of markets** outside the UK over which we have no control.

The point is also made that some overseas facilities, even in developing countries, may actually be more modern and environmentally benign in their operations than those in the UK and that the UK government's role is to use this international market to ensure that our national waste targets are met at the lowest possible cost commensurate with the relevant regulations. However, concerns were expressed that where we do export wastes that exacting standards for quality of recyclates and processes should be applied.

There are some who think that such decisions should be made on a **case-by-case basis**, and/or taking into account a **life-cycle assessment** of the particular material.

Q32: What should the balance be between the development and encouragement of domestic capacity for recycling and the reliance on overseas markets?

Group	Number of comments
Development of domestic capacity is preferable	128
General observations	33
Let the market decide/will anyway	32
Recognise reality of/need for export markets	19
Export only when no domestic option	8
Sustainability / life cycle assessment	8
Set standards for exported materials	4
Assess on case-by-base basis	3
Exporting waste should be avoided	3
Creating added value	1
Questions arising from review	1
Set standards for materials collected	1

Commercial and industrial waste

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

265 participants responded to this question. Suggestions included **fiscal incentives and penalties** such as a **raw materials levy**, **statutory targets**, **increasing the costs of landfill** and other forms of disposal, more **information, guidance and education**, and the general **increasing of recycling and recovery infrastructure**.

In general the waste industry is saying the answer is that when the price is right C and I waste will flow; local authority respondents are saying that this can be kick-started by regulation and targets. But the waste industry is also pointing out that the infrastructure needs to be in place to deal with it when it does flow. There is also concern from one public sector participant that six years on from WS2000 there is still not the data, information or systems in place to allow design of controls for C and I waste.

There is also here an emphasis on **producer and retailer responsibility**, and on the importance of businesses making proper **waste plans**, with government insisting on manufacturing and other commercial operations having **on-site facilities** to deal with the waste produced, and businesses having to **report** in detail how they handle their waste.

Another theme that emerges is the idea of **integrating the commercial and industrial waste streams with the municipal waste stream** in order to offer economies of scale in the provision of recycling and recovery facilities. Bringing commercial and industrial waste within the ambit of local authorities would in particular help address the problems of the waste created by **SMEs** which is excluded from municipal collection but often is too little to be worth a private contractor collecting.

Q33: How can we encourage more recycling and recovery of commercial and industrial waste?

Group	Number of comments
Fiscal incentives/penalties	65
Set statutory targets	48
Increase costs of disposal/landfill	47
Develop infrastructure/access to recycling	33
General substantive observations	33
Information, promotion and guidance	25
Producer/retailer responsibility	18
Review, clarify and enhance legislation	15
Education and awareness	13
Requiring waste planning/reporting	13
Support market development	13
Integrating waste streams	12
Raw material levies	9
Boost resources for/use of BREW	7
Increase segregation	7
Subsidy and grant support	7
Apply landfill directive to business	6
Clarify/reform LATS	6
Increased research and knowledge	6
Abandon incineration	5
Clarify/change/re-interpret terminology	5
Restricting landfill of recyclable materials	4
Assess on case-by-case basis	2
Land use planning	2
Policing to prevent illegal disposal	2
Reduce costs/burdens of permits etc	2
Charging for non-recyclable waste	1
Review inadequate	1

Construction and demolition waste

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

235 participants responded to this question. There is a lot of support for the proposals in the consultation document and in particular the development of **site development plans**. Some participants extend this idea further with the suggestion to develop **minimisation, reuse and recycling plans** for building sites.

Other suggestions from all sectors include **fiscal incentives and penalties** such as offering VAT reductions on recycled or more sustainable products, encouraging developers to specify materials that used **recycled content** or that can be recycled. Some suggest this should simply be guidance while others would like to see it built into building regulations or as part of a green procurement strategy that will kick-start the market for recovered materials.

One waste industry participant points out that the highest levels of recycling are already in the C&D market and that it would be useful to introduce the enforcement that all brown field sites identified for housing have specific systems incorporated within the construction phase and the housing infrastructure itself to ensure that high levels of recycling are achieved.

Others suggest that **planning conditions** could specify for site waste management, and which plans should be used. Some comments suggest the use of **standards or protocols** similar to the Sustainable Homes Code, or PAS 100 standard for compost.

There are a number of **other areas** where participants suggest more could be done, such as segregating materials to make recycling easier, requiring on-site recycling, managing better any unused materials, and the development of information and demonstration projects. One local authority participant suggests many projects throw away large quantities of unused goods as re-stocking charges are prohibitive and prestige re-fits of offices and shops dispose of large quantities of valuable resources because time not resource is the overriding factor. Government should consider how to incentivise contractors to donate such materials to community organisations and how to stimulate the capacity in the community sector to deal with such C and D waste.

Q34: What more should we do to encourage reduction, recycling and recovery of construction and demolition waste?

Group	Number of comments
Fiscal incentives/penalties	40
General observations	27
Support proposals/SWMPs	27
Specify/require use of recycled material	21
Agree standards and protocols	19
Use planning conditions/legal agreements	19
Set statutory targets	17
Regulation/enforcement	16
Require site waste min/reuse/recycling plans	12
Agree definition of waste/resource	11
Education and awareness	10
Information, guidance, demo projects	10
Segregate materials	10
Managing unused material	9
Require on site recycling	8
Research and development	4
Avoid unnecessary demolition	3
Sector-specific support	3
Tax virgin materials	3
Data inaccurate	2
Restrictions on landfill/incineration	2
Use waste audits	2

Ban incineration	1
Encourage prefabricated construction	1
Reconfigure demolition industry	1

Small and medium sized enterprises

Question 35: What are the current practical and cost barriers to recycling by SMEs?

223 participants responded to this question. Most responses from most sectors focus on **lack of awareness**, and **limited access to support** and advice as key barriers for SMEs. Other practical reasons suggested are **lack of access to facilities**, **lack of staff** or other resources, **lack of time and lack of storage space** to sort recyclables.

A large number of comments also feel that there are **no real commercial drivers** to encourage SMEs and in many cases **costs** (perceived or real) are a disincentive. The **lack of statutory or financial incentives** to SMEs is also cited. In terms of infrastructure, a number of participants comment on the **lack of service providers** available to SMEs, and the charges that they incur if they do find providers.

The waste industry emphasises cost as the major barrier, with lack of local facilities and hence the need for transport to what facilities there are as being an additional complication. The public sector sees the problem more as a lack of real obligation coupled with the lack of real incentives.

The community sector has a slightly different take on the subject. They identify the barriers as a lack of markets for all but the highest value materials, and dependency on grants and subsidies usually from local authorities, although there are some trends that improve this situation, such as increasing waste disposal costs which make recycling services more attractive.

Q35: What are the current practical and cost barriers to recycling SMEs?

Group	Number of comments
Lack of awareness, information, advice, expertise	50
Costs	47
Lack of time	41
Economics of commercial recycling	39
Lack of storage/separation space	37
General observations	32
Lack of service providers / facilities	32
Lack of staff/other internal resources	31
No statutory or fiscal drivers	29
Cheaper/easier alternatives	24
Lack of easy access	8
Lack of strategic emphasis	8
Bureaucracy	6
Lack of end markets	4
Criticism	2
Lack of access to recycle	1
Lack of funding for VCS infrastructure	1
Separation of waste and recycling impractical	1

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

205 participants responded to this question. There is a strong sense that the **Government needs to intervene** to help overcome these barriers. Suggestions about the form this should take are varied and include: the introduction of **recycling credits** for SMEs; **increases in landfill tax; tax incentives** such as reduced VAT on recyclable materials; and **direct funding** of schemes via BREW or Envirowise. Waste industry participants believe the revenues derived from these sources should be invested back in new facilities.

Information sharing and **awareness raising** schemes are suggested by many participants, whether a **one-stop-shop** for advice and sign posting where to go for services, **online auditing systems** to assess potential for savings, websites for best practice and guidance, support from **trade associations** and **peer group exchanges** of information.

As with other questions, the public sector is more inclined to feel that change needs to be driven by **regulation and targets**, one example being **that** there could be a requirement placed on the waste industry to offer recycling services in a similar way that the Household Waste Recycling Act created a duty on household waste. This would create a level playing field and a strategic role for local authorities to convene stakeholders and facilitate local business waste strategies. Others pick up on opportunities for SMEs around **collaboration** and the provision of **shared facilities**, such as waste exchanges, and recycling parks and clubs with support from BREW programmes such as NISP. For example, collection and storage is a problem that could be overcome through collaboration, with industrial estates, local authorities and companies working together.

Where community recyclers interpret this question as referring to the ways government could support them to increase the scale of their operations, they identify funding as the most important form of government support. This will enable them to buy collection / separation equipment such as custom designed bins.

Q36: What might business and commercial providers do to overcome these barriers and how could the government support them?

Group	Number of comments
Government funding / incentives	73
Info sharing and awareness raising	41
Regulation, targets and guidance	33
Collection and Storage	30
Collaboration	18
Provision of facilities / services	18
Increase landfill costs	13
Involve business support networks	9
General observations	8

Hazardous waste

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

224 participants responded to this question. There is a large measure of **support for the priorities** as identified in the Review, and **for the principle of producer responsibility**. A waste industry participant points out that what is currently disposed of as 'household waste' can include solvents, additives, paints, glues, dyestuffs, cleaning chemicals, garden pesticides, insecticides, agrochemicals, fertilisers, and a range of other similar products.

A majority of those who respond from all sectors believe the new initiatives **should be statutory**, provided there has been an appropriate full risk assessment and life cycle analysis completed, though there is some concern that these products would be very difficult to control.

A substantial minority, however, **challenge** these priorities and also the idea of making them statutory. As one participant from the community sector points out, oils, liquid chemicals and paints are not easily traceable and there is no legal basis for holding a manufacturer responsible for the use of a liquid product or its hazardous escape into the environment once purchased by a consumer. There are much easier places to start when looking to extend producer responsibility: container deposit systems are mentioned as a promising example.

One of the main reasons for these differences between the private and community sectors are beliefs about the availability of suitable **infrastructure and resources** for dealing with the consequences, and this also influences those who believe these initiatives must in the first instance be voluntary and should rest on considerable **engagement** with those who will be responsible for collecting and handling hazardous materials.

Q37: 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?

Group	Number of comments
Support priorities	122
Statutory	80
Infrastructure and resource issues	55
Broaden scope	39
Challenge priorities	36
Voluntary first	22
Engage with stakeholders	20
Refer to research or learning	18
Fiscal incentives and penalties	16
Enforcement issues	10
General support	6
Combine statutory and voluntary	3
Q38	3

Household hazardous waste

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

240 participants responded to this question. Of those who responded:

	Support	Challenge
option a	101	9
option b	88	13
option c	92	15
option d	138	4

It is not possible to indicate if any one sector prefers any one option since no pattern is clear. However, 53 participants say they support all these options, and this tends to include the environment and community sectors.

Whichever option they support, many participants have further comments to make, notably on the **funding and infrastructure implications**, and there are a large number of highly detailed and clearly expert submissions on this topic.

Another issue that recurs in many responses is that of **householder obligation or education**: the extent to which should householders be made more responsible for their own waste. This is also a subject where participants feel there needs to be more **consultation** with local authorities and others in the waste business.

Q38: Which of the options for household hazardous waste outlined above should be taken forward?

Group	Number of comments
Support option d	138
Support option a	101
Support option c	92
Funding and infrastructure implications	91
Support option b	88
Support all options	53
Householder obligation or education	22
Other options / general comments	18
Challenge option c	15
Challenge option b	13
Further consultation	12
Challenge option a	9
Challenge option d	4
Challenge all options	3
Fiscal incentives and penalties	3

CHAPTER 6 – ROLES AND RESPONSIBILITIES

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?

270 participants responded to this question. **Support** for the proposed Sustainable Waste Programme Board runs at about 3 to 1 across all sectors, although many supporters, also from all sectors, do introduce some **detailed caveats** around its remit, decision making power/authority, funding, composition, operation and management.

Those who **challenge** the idea mostly do so on the grounds that **another layer of government** is unlikely to add value to the existing layers. Some respondents expressed a desire for the name of the Board to include resource management to reflect an increased focus on waste as a resource. There is possibly more scepticism from waste industry representatives who see another layer of government as likely to cause confusion or who wonder why there simply cannot be better coordination among existing departments with responsibility for waste. On the other hand, there are those who believe that such a board could play a useful role in engaging wider stakeholders and ensuring their views and ideas are taken on board when developing and delivering policy. Some stakeholders also through the Board could curb the perceived enthusiasm of the Environment Agency for making policy rather than just regulating its implementation.

There are also **detailed concerns** about its **membership** and **liaison** role, and about its **terms of reference**. For example, there is public sector concern that having a single local authority representative on the Board is insufficient, suggesting that, given the differences between waste disposal authorities and waste collection authorities, both types should be represented and recommending LARAC or LGA representation.

Some participants argue for the **inclusion of community and voluntary sector** representatives both to ensure that it is not dominated by business interests, and so that it has access to participants on the ground who are active in diverting waste. The community sector also suggests that should there be stakeholder participation then it should be balanced, with environmental NGO representation included. Some respondents promoted better representation of organisations with a social and economic perspective, as well as an environmental one in order to move towards true sustainability. Many industry representatives also urged that the Board membership include representation from business and the waste industry, through such bodies as ESA and CIWM.

As regards its terms of reference, the main concern is where the proposed board will **focus** its activities, what its specific duties will be, what **powers** it will have to get things done, and what resource/supporting infrastructure would be in place to ensure its is able to drive change within the timeframes required.

Regarding the possibility of a standing advisory board of stakeholders, where respondents commented on this they generally expressed the desire for more detail on how this would work and promoted a strong role for the Board in making links with wider stakeholders and using these networks more effectively to ensure full and adequate representation from all interested/involved parties in addressing the challenges on waste.

Q39: 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?

Group	Number of comments
Broad support, if some caveats met	155
Membership / liaison	89
Terms of Reference	51
Challenge need for SWPB	49
General / contextual comments	27
Title	7

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?

263 participants answered this question. About three times as many participants, of those who answer this question, offer **broad support** for these proposals compared with the number of those who are more cautious. A minority are actively **hostile** to it. Several supporters offer **examples of existing initiatives** that provide reasons and evidence for their support.

Opposition stems mainly from concerns about **duplication, effectiveness and accountability**. Those who are more **cautious** are mostly so on the grounds that **partnerships can take a long time** to establish and be effective, and that working at the regional level is likely to **encourage more large and long-term contracts**, which some participants already see as a problem as they can squeeze out smaller, more specialist and community-based activities.

In addition, there are a number of responses that point in detail to the **challenges** inherent in achieving the type of partnership working that is intended: for example, the fact that all the potential constituent organisations are starting from different places.

As regards attitudes in different sectors, it is generally true to say that while there is broad cross-sector recognition of the value of partnership working, the waste industry offers more by way of specific reasons for their support. For example, one waste industry participant notes that local authorities lack the specialised procurement expertise demanded in the waste management arena: because they so rarely let waste contracts there is limited continuity in terms of experience and knowledge. Moving procurement to a sub-regional basis would enable a body of experience and knowledge to be built up within the procuring organisation that would facilitate expeditious and cost-effective tendering processes. Another says that it is essential for RDAs and local authorities to work together to ensure that an adequate network of facilities is available for the recycling, recovery, and management of waste, as required by PPS10, and they should assist Regional Planning Bodies in ensuring that Regional Waste Strategies are incorporated into Regional Spatial Strategies otherwise the new system of Waste Development Frameworks cannot progress.

The public sector also supports partnership working but is looking to government for stronger leadership and stronger support for partnerships to help them through the vagaries of local politics.

The community sector is on the whole more cautious because they fear partnership working will mean increasingly large contracts and that the community sector will be progressively squeezed out of them, particularly as there is no democratic representation at regional level.

Q40: Do you agree that more emphasis is needed on partnership working between local authorities at the regional and sub-regional level on waste procurement?

Group	Number of comments
Broadly support proposal	156

Depends / maybe	47
Disagree with proposal	23
Existing initiatives	23
Challenges in achieving this	21
Other	17
Concerns around large contracts	9

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?

221 participants responded to this question. Although this question relates to RDA and to local authorities, on the whole participants do not differentiate between the two when responding. It is not always clear therefore what differing and common views are being expressed. Having said this, there is a sense that there is a lot more opportunity for **coordination and partnership** working between regional and local agencies, and this is expressed by all sectors.

A number of participants discuss the role RDAs and local authorities have in supporting the development of **waste processing facilities** both through the **planning** process and via **funding**. Some participants see the **RDA** as providing a **strategic regional role** in understanding the number and type of facilities needed across a region, and developing regional markets for materials, rather than this being a purely local authority led activity.

It should be noted that a significant number of participants regard **RDAs as inappropriate bodies** to be involved in resource management. Reasons cited include an added level of confusion; an added level of administration, and therefore cost; and a lack of democratic accountability. These tend to be, but not exclusively, local authority views.

Q41: 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?

Group	Number of comments
Coordination / partnership working	60
Support waste processing infrastructure	47
Market development and procurement policies	35
Promotion / support	28
Funding / Incentives	27
Less / query RDA involvement	23
Policy / strategy / direction	19
Case study experience	10
More RDA involvement	10
Research	8
Assist in providing good planning framework	6
Monitoring and evaluation	6
Other	6
Include other regional bodies	5
Issues around closed loop economy	4

Local level

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

234 participants responded to this question. About half of those who respond **approve** of these characteristics with varying degrees of enthusiasm: from those who simply endorse them as they stand to those who agree with them providing they are accompanied by other factors, such as **funding, political leadership, systemic thinking** and **communications programmes** to ensure widespread understanding and acceptance of them.

The waste industry sector emphasises that this sort of wish-list is less important than how these characteristics are delivered in practice. One waste industry participant also points out that there are significant differences in the way the UK has developed its system for managing municipal waste: compared to many other EU Member States, local authorities do not have a direct role in the operation of infrastructure. The integration of household, municipal and commercial waste streams is best encouraged through the operation of contracts, and specifically by the simplification of procurement requirements by central Government.

There are also a number of participants who, while supporting the characteristics in general, suggest some **specific amendments** to sharpen them, for example that the second bullet point under the Systems heading should be amended to include a wider range of treatment and recovery technologies, such as MBT/AD, on the grounds that reference only to 'energy from waste systems' is too narrow.

An equal number of responses, however, contain some **serious reservations**, or want changes to the **emphasis or the text** before they are prepared to support the characteristics. For example, the community recycling sector would like to see social aspects higher up the list and points out that the interests and concerns of the community sector are always at the end of such lists.

Another group of participants feel that while these characteristics, with or without amendments, are useful, the real challenge is in **delivery** rather than in finding words to describe what is ideal. There is also a group who feel that certain characteristics are absent: one participant, for example, notes that apart from the reference to 'sustainable funding', there is no reference to **sustainability**.

Q42: What are your views on the characteristics for good practice in Local Government set out in Box 2?

Group	Number of comments
Support the characteristics	113
Comments on delivery	68
Some reservations	60
Changes to emphasis or text	47
Missing characteristics	18
Challenge this view	7

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?

208 participants responded to this question. Responses to the first question range right across the whole spectrum from **totally ineffective** to **very effective**. Significant numbers of participants feel it is too early to tell.

The variation seems to depend in part on where the answer is coming from: local authorities, for example, seem broadly satisfied with how partnership arrangements are working but some still see a role for **more support from government**, and others wonder whether Local Area Agreements (LAAs) are really so significant: as one points out, LAAs are not necessarily about delivering statutory waste outcomes. A number also mention that meeting recycling and composting targets is affected by many factors such as investment, resources, geography, and social structure. Likewise, there are

variations in collection of both recyclables and residuals as there have been in planning and providing treatment and disposal capacity.

The waste industry is also generally positive about LAAs while pointing out that there is still much to be done and some sense that government is still not really grasping how big an issue waste is.

Community recyclers feel unable to comment since there has been little impact on their sector, although this in itself could be an indication of ineffectiveness, given CRN members' geographical coverage.

A relatively small number of participants address the second question in any detail. Of those who do, many think it is the basic **roles and structures** of partnership that need re-thinking, while others focus more on **who else** needs to be brought into partnership working (communities, for example), and on issues around **funding and resourcing**.

Q43: 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?

Group	Number of comments
Partnership and best practice	36
Refer to local experience	34
Not effective	32
Partial or variable effectiveness	27
Funding and resource issues	21
Rethink roles and structure	20
Business involvement	14
Community involvement	13
Incentives and targets	11
Have been effective	10
Barriers / conflicts of interest	8
More flexibility	4
No comment / too early to tell	83

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?

241 participants responded to this question. The balance of responses, particularly from local authorities themselves, but also from many environmental groups, **agree strongly** that there is such a demand, with many responses going on to explain that local authorities are usually the **first port of call** for businesses with waste problems, why this demand is not being met, and how it could, and should, be met since it will lead to higher recycling rates in this sector. Most Local Authorities also point out that they will need resources to meet such a demand, which could be via BREW or via new powers to introduce variable charging.

This is also reflected in the number of responses describing **local infrastructure and resource needs**, with many commenting in detail on the costs faced by businesses and the opportunities for integrating waste services more effectively.

There are also many responses reflecting on the respective **roles and responsibilities** of local authorities, community recyclers, and private sector waste management operations in relation to demand from businesses. For example, some waste management companies do not perceive such a demand exists since, in their experience, business tend to see waste contractors as the logical choice.

Q44: Is there a demand from businesses for increased help from local authorities with recycling services and resource management?

Group	Number of comments
Yes, there is demand	148
Comments on resource and infrastructure	93
Comments on roles and responsibilities	63
Comments on incentives and targets	42
Concerns over LATS	30
Potential demand	25
Existing initiatives	18
No demand	11
Further research needed	3

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?

254 participants responded to this question. There is widespread **support** for this proposal, particularly from local authorities themselves, but also from environmental and community groups, with many responses focusing on the need for changes and developments in **resources, infrastructure and funding**. Suggestions include funding through BREW and other partnerships, e.g. RTABs, Remades, RDAs. There are also comments on the need to fit with expanding regional and sub-regional coordination and to ensure local decision-making. Some responses contain detailed recommendations and suggestions.

About half as many either **challenge the proposal** or have **reservations** about it, including many of the large waste management companies, who suggest they are better placed to deliver than under resourced and over burdened local authorities, particularly in respect of non MSW.

Other responses cite a range of objections: from general scepticism about the **capacities** of local authorities, to the belief that a strategy needs to spring from the **national or regional level** or, conversely, that it is only at the very **local level** (i.e. the community) that things actually get done. Others again believe that **market forces** should be allowed to drive the whole process.

One recurrent theme throughout these responses, regardless of whether participants support or oppose the wider strategic role for local authorities, is the importance of **partnerships** between different sectors and **engagement** with a wide range of stakeholders. It is noted by some community recycling organisations that local authorities need to treat them more as partners and look to develop mutual benefit, rather than approaching them primarily as a route to get messages out locally about purely LA activities.

Q45: What are your views on the proposed wider strategic role for local authorities and how this could be supported?

Group	Number of comments
Resources, infrastructure and staffing	140
Support this proposal	126
Partnership and engagement	66
Some reservations	52
Other concerns / suggestions	34
Challenge this proposal	17

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?

244 participants responded to this question. There is a fair measure of **support** for placing such requirements on local authorities and/or businesses, though some of the support comes with strings attached - often along the lines that it will work providing the requisite **resources and infrastructure** are provided.

Local authorities themselves tend to favour a more **level playing field** with more onus being placed on business, for example through a duty of care on business to manage its waste according to the waste hierarchy whoever it contracts with, or requiring all waste contractors to offer a **minimum recycling service** to commercial and industrial customers.

The larger waste management companies tend to be against this kind of approach, as before, on the basis that it is best left to a better resourced private sector and to market forces including LATS. Indeed, the issue that concerns many participants is the **implications for LATS**: for example, the potential impacts of LATS in taking in additional waste streams, and the concern that trade waste could count against LATS targets. This is a risk that participants feel Government will have to address before local authorities will be willing to advance on this front.

Another area of concern is that this proposal could lead to **local authorities investing** in new facilities **without any guarantee** that businesses will use them, thereby incurring **additional costs for local taxpayers**; and requiring businesses to use them could be construed as anti-competitive.

On balance, participants seem quite evenly divided on this issue: those who support it in principle being more or less matched by those who doubt its practicability.

Q46: What are your views on placing requirements of this kind on local authorities and/or businesses?

Group	Number of comments
Some reservations	89
Comments on resourcing / costs	84
Comments on business role / markets	72
Support this approach	50
Comments on LATS	45
Comments on obligation / statutory duties	45
Comments on targets / incentives	37
Challenge this approach	31
Existing examples	20
Need for additional facilities and services	10
Other comments	8
Defining waste based on its source	3

Local authorities and producer responsibilities

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

212 participants responded to this question. There is a strong sense that **more interaction** between local authorities and producer responsibility schemes is needed. The principle concern expressed by local authorities is whether and how local authorities would receive **funding** for the additional work and services that may be required.

Guidelines, lines of responsibility and **contractual arrangements** need to be spelt out clearly. This is in response to a concern that there needs to be far **more participation and partnership** between public and private sector organisations.

There are also arguments for ensuring **targets are clear and harmonised between** local authorities and producers, so that conflict or tension between meeting different sets of targets does not occur.

Q47: What changes need to be made to ensure better interaction of producer responsibility schemes and local authorities?

Group	Number of comments
Finance and markets	103
Targets / monitoring / regulation	70
Engagement / participation	63
Facilities and infrastructure	44
Clarity / transparency	21
Support approach	18
Central Gov role	17
Challenge approach	14
Packaging standardisation / minimisation	11
Timescales	7
Other comments	5

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?

248 participants responded to this question. A large number comment on the value and scope of the role played by the voluntary and community sector (VCS) and on the need for greater government support. The main reason cited for this is the need to **engage and inform local communities** more, a role for which many consider the VCS is uniquely suited. However, many in the sector itself do not want their role to be limited to passing on information from other bodies.

Beyond this role, community re-use and recycling organisations point out that they play an important part in waste diversion (11% of household waste diverted for recycling and composting by around 1000 active groups, according to DEFRA figures). This role is also appreciated by many local authorities and national environmental groups.

Responses suggest that government can facilitate a greater contribution from the VCS by **reducing the barriers to procurement** by, for example, encouraging (sometimes reluctant) local authorities to let **smaller waste contracts**, cutting red tape and **writing social and community objectives** into waste contracts; helping the VCS to do one of the things it is considered best at – namely **innovation**; and provide **longer-term funding**, and funding for **skills- and capacity-building**. The VCS would also get a boost if the government placed greater priority on approaches higher up **the waste hierarchy** since many VCS organisations specialise in re-use and refurbishment, as well as recycling, and rather than waste disposal.

This role could be recognised through, for example, **re-use credits** paid to furniture and appliance re-use organisations, and giving local authorities a **re-use BVPI** which is separate from the recycling BVPI. There are suggestions that local authorities should **involve local re-use organisations** in the production, development and implementation of their local waste strategies.

Many of these comments reflect the community sector's desire to be treated as a full player, with greater recognition for and integration of the third sector or social economy with local and national government programmes.

However, there are also a smaller number of voices, primarily from the waste management industry with some local authorities, who caution against creating unfair competition with the private sector and who stress the need for complementarity. It is suggested that further work could be carried out by Government before making changes, to examine where objectives are environmental and where primarily social, to help determine appropriate roles and support.

Q48: 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?

Group	Number of comments
Finance / support / information	129
Comments on value / scope of VCS role	108
Links with government / business	90
Contract / competition issues	56
Capacity and skills issues	49
Support these approaches	35
Targets / standards / incentive	23
Re-use and recycling credits	19
Regional / national coordination	15
Challenge these approaches	9
Other comments	8
Address regulatory barriers	7
Give guidance for LAs	4

CHAPTER 7 – WASTE CRIME

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

252 participants responded to this question. It is apparent from the responses that most participants perceive the need for a multi-stringed approach consisting of **more resources for enforcement**, **harsher penalties** for those involved, **better liaison and coordination** among those responsible for policing, and finally, a campaign of **information and education** to help prevent waste crime.

The main differences between participants concern which body(ies) should be responsible for effective enforcement, with opinion divided between the Environment Agency, a strengthened Defra, and/or local authorities. Different opinions do not appear to be sector-specific.

Under these several headings there are numerous other suggestions, including **clearer guidance for the courts** and a **review of the relevant legislation**. There are also ideas about **reducing the motivation** to commit such crimes in the first place by providing **more facilities**, and reducing the **economic drivers**.

For some the answer requires **more research** into what gets fly-tipped, and why. Understanding precise motivation in different localities will enable both prevention and enforcement to be more effective, and it may be that, for example, **integrating commercial and municipal waste streams** will have the effect of **reducing the incentives** to commit such crime.

Q49: What additional action is needed either to achieve effective enforcement or to prevent waste crime?

Group	Number of comments
More resource for enforcement	69
Stronger / suitable penalties	66
Education and information campaigns	49
Closer links between agencies	43
Guidance / training for courts	25
Give more enforcement powers	21
Provide better services and facilities	20
Use of clean neighbourhood legislation	17
Review of legislation required	14
Better enforcement	13
Review economic drivers	11
Public / stakeholder involvement	10
Effective duty of care	8
National tracking /coordination	8
Better definition	5
Existing legislation is sufficient	5
Other comments	5
Other waste crimes	5
Reduce potential offence sites	5
Support the approach	5
Fly capture initiative	4
Focus on serious crime	4
Create a dedicated agency	2
Deal with fly tipping rapidly	2
Support victims and whistle-blowers	2

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?

214 participants responded to this question. **Opinion - and apparently evidence - is divided** around this subject. Local authorities - as might be expected - appear to be clearer that there is such a link, and some quote evidence in support of it; there also appears to be some evidence that the introduction of recycling schemes has also increased fly-tipping. But others indicate that the general level of cleanliness is better and the level of fly-tipping lower than in authorities of a similar profile but with a less comprehensive suite of services.

There seems to be some **anecdotal evidence** that fly tipping is more of a problem in deprived areas, particularly when accommodation allows little storage area for rubbish and there is a population not much interested in the environmental impacts of fly tipping. On the other hand, there is also evidence that improving the local environment and providing comprehensive waste services may not prevent fly tipping either.

Mentioned among the **solutions** are better policing and enforcement, education and publicity, low or no charges for the collection of bulky objects, and providing better access to facilities - for example, longer opening hours at Civic Amenity sites.

Q50: 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?

Group	Number of comments
Evidence around collection / disposal services	31
No evidence of a link	29
Solution - monitoring and enforcement	25
Evidence around socio-economic factors	22
Solution - collection services	21
Solution - education and publicity	21
General comment	19
Solution - access to facilities	19
Evidence around charging	18
General evidence to support the link	17
Solution - rethink C and I services	16
Solution - low or no charges for bulky collection	15
Evidence around high density housing	9
Evidence around intro of recycling schemes	6
Solution - provide credits / incentives	4
Solution - address socio-economic factors	3
Solution - regulation and targets	3
Solution - rapid clean-up	2

CHAPTER 8 – POLICY SUMMARY

Question 51: Do you have any further comments?

258 participants responded to this question. While there are some additional comments made in this section, most submissions either summarise key points made already, provide information on the submitting organisation, or comment on the document and consultation. It is therefore recommended that these submissions are read online.

Group	Number of comments
Information on organisation	99
Other observations	95
Comments on the consultation and document	20
Concerns about EfW	13

Supporting documents

Environmental Report

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

The 50 people who responded to this question on the Environmental Report provided a wide range of comments. Key themes that emerged included the following:

The issue on which most comments were received was the health and environmental effects of energy from waste, with respondents presenting views that the health risks were greater than presented in the Environmental Report. The health effects of landfills were also considered to be an area meriting further investigation. Several respondents agreed that more emphasis should be placed on waste prevention measures, in line with the conclusions of the Environmental Report.

Views were given on indicators that were felt to be appropriate to monitor implementation of the strategy, such as on health and resource use. Some responses felt that more indicators were needed, others that fewer were required. Other comments were at a more detailed level.

Q52: Do you have any comments on the Environment Report?

Group	Number of comments
Comments on scenarios	11
Comments on EfW	7
General comments	7
Supporting statements	6
Use of indicators	6
Specific references	5
Challenge the report	2
Compliance issues	1
Monitoring issues	1
Reference to composting	1

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?

Those who comment are making generally quite detailed comments on, among other things, the uses and deficiencies of cost/benefit analysis, the quality of the data used, and Energy from Waste. It is therefore recommended that these submissions are read online.

Q53: Do you have any comments on the Partial Regulatory Impact Assessment of the Waste Strategy Review?

Group	Number of comments
Energy from Waste concerns	4
Economics as the main driver	3
Environmental benefits	3
Quality of data used	3
Stress minimisation	3
Compliance issues	2
Estimation of resources needed	2
Challenge need for PRIA	1
Greater detail needed	1
Health issues	1
Impact on water companies	1
Simplify the regulatory system	1

STANDARD AND FORM LETTERS

The 3432 standard and form letters which came by e-mail and post addressed a number of issues.

While most made reference to the need for an incinerator-free policy, there were also other policy recommendations for inclusion in the waste strategy:

- Make a commitment to high recycling and composting targets for household waste, aiming for 75% by 2015
- Allow councils to charge participants for the amount of rubbish produced (after recycling is taken out). This will mean that rather than everyone paying the same through council tax, those of us who recycle more and reduce our waste production will pay less than those who do not
- Discourage the use of incinerators to dispose of waste through introducing a tax on incineration. This will encourage councils to maximise recycling, which is a more effective way of tackling climate change
- Give companies (such as supermarkets) compulsory targets for reducing the amount of waste they produce, particularly waste which cannot be recycled or composted
- A clear strategy to prevent councils being tied into contracts that require them - far from reducing waste - to produce as much waste as possible to avoid penalties from incinerator operators
- Pass legislation to:
 - a) control packaging, the use of plastic bags, junk mail and unnecessary supermarket pre-packaging of food (e.g. fruit and vegetables on polystyrene and cling wrapped)
 - b) severely reduce packaging that cannot be easily recycled – at present the majority of councils are unable to take many types of plastic waste used in food and other packaging, despite it being labelled as recyclable
- Put far greater emphasis on effective design and professional implementation of user-friendly recycling collection systems to help overcome problems due to the multi-tier structure and lack of

expertise of local government. Some feel that LA services are over-expensive and badly run, leading to poor take up by residents

- Modify planning law so that building regulations require new housing to incorporate facilities where separated waste can be conveniently stored for recycling. Funding should also be made available so that existing properties can be adapted. This is a particular issue with existing high-density social housing
- Be far more pro-active on waste minimisation, in particular by putting pressure on those who supply potential waste material to consumers such as retailers and manufacturers
- Promote flexible, local waste solutions in accordance with the proximity principle, to reduce the transport of waste and allow new, more efficient waste technologies to be implemented as they become available. Micro-generation plant, based on anaerobic digestion, is just one possible example.

There were also 38 letters recommending the adoption of a Zero Waste Charter: a nine-point plan to transform Britain's waste economy:

1. *Set a target of Zero Waste for all municipal waste in the UK by 2020 (50% recycling by 2010, 75% by 2015).*
2. *Extend the doorstep collection of dry recyclables to every home in the UK without delay.*
3. *Supplement home composting with doorstep collection of organic waste, and establish a network of local closed vessel compost plants.*
4. *Convert Civic Amenity sites into Re-use and Recycling Centres.*
5. *End thermal treatment of mixed waste and limit disposal contracts to a maximum of ten years.*
6. *Extend the Landfill Tax into a disposal tax. Increase its level, and use it to fund the Zero Waste programmes.*
7. *Extend Producer Responsibility legislation to all products and materials that are hazardous or difficult to recycle.*
8. *Open up waste planning to greater public participation and end the commercial confidentiality of waste contracts.*
9. *Establish a Zero Waste Agency to promote resource efficiency and act as a guardian of public health.*

FURTHER INFORMATION

Copies of the individual responses can also be obtained through the Defra Information Resource Centre, situated at Lower Ground Floor, Ergon House, 17 Smith Square, London SW1P 3JR (Tel: 020 7238 6712 or defra.library@defra.gsi.gov.uk). Opening hours are 9am-5pm, Monday to Friday. An administrative charge will be made to cover photocopying and postage costs.

If you require further information on the review of Waste Strategy 2000 please go to <http://www.defra.gov.uk/environment/waste/strategy/review/index.htm> or contact the Waste Strategy Review Team at Defra directly on wsri@defra.gsi.gov.uk or 0207 082 8872.