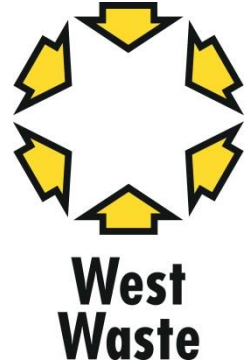


West London Waste Authority

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Date: 20 November 2017

The Rt Hon Michael Gove MP
Secretary of State for Environment, Food and Rural Affairs
House of Commons
London
SW1A 0AA

Dear Minister,

The Defra Voluntary and Economic Incentives Working Group has issued a call for evidence on “voluntary and economic incentives to reduce littering of drinks containers and promote recycling” that focuses upon consumers as the target for the scheme. I am writing to you directly because a more radical approach is needed. Focusing on consumers will not bring success; it will add bureaucracy to a system which is already faltering.

To ensure packaging material is returned, recycled and integrated back into product design the working group should be asking questions with a wider scope of influence across the whole supply chain, seeking to create links between new products, recycled products, collection points, consumer messaging and education.

A producer led scheme focusing on capture of packaging materials before it becomes waste will result in less litter, it incentivises and benefits the committed recycler who won't put recycling into a litter bin and prevents litter bins being scavenged for income.

A producer led scheme will increase recycling and answer the question that is regularly asked by householders namely “*where does all of our recycling go to?*” Being able to buy drinks containers that are clearly advertised as made of recycled material will answer that question.

Additional benefits include:

- Increased efficiency; Companies producing and marketing consumer products are better placed to influence consumer behaviour than government or local authorities,
- Improved productivity; Capturing materials before they become waste,
- Increased quality; Reducing contamination at the point of return,
- Increased quantity; Ensuring packaging is easy to recycle, and
- Improved behaviour choices; Shifting the cost of managing waste packaging from taxpayers to consumers will reduce waste overall.

Deposit Return Schemes and Reward and Return schemes have been compared to the five pence charge for plastic bags but in behaviour terms these are very different. The consumer has to choose whether to spend 5p on a plastic bag and it can never be reclaimed. The plastic bag is in addition to the shopping being purchased, whereas a bottled drink cannot be purchased without the container. The shopping has to be transferred and then the basket or trolley can be returned but drinks on the go are consumed as the person travels and so finding the correct place to return the drink container is more complicated.

Local authorities will have to manage the negative consequences of lost investment in infrastructure and the commercial arrangements that rely on that infrastructure. Recycling targets and the PRNs system will need to be reviewed. However we cannot maintain the status quo for fear of the impact that change will bring. Our current course will not only maintain the current inefficiency of pushing recycling into a saturated market (driving down the price of raw materials), it reinforces the cynicism of householders about recycled products in particular and the recycling process as a whole.

West London Waste Authority would be delighted to join Defra, retailers and waste industry groups to explore these ideas further with a view to driving real and lasting improvements in recycling and litter prevention.

Yours sincerely,



Emma Beal
Managing Director

About West London Waste Authority

West London Waste Authority's (WLWA) purpose is to be leaders in treating waste as a valuable resource.

WLWA was created as a statutory joint waste disposal authority (WDA) in 1986 to dispose of waste collected by the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames.

About 1.7 million people live in this area, which covers 38,000 hectares.