

WLWA Response to consultation on the draft London Environment Strategy

Do you agree with the overall vision and principles of this draft London Environment Strategy?

WLWA agrees with the overall vision and principle of the draft London Environment Strategy. We note that it is very ambitious in the current socio-economic climate. The level of inter-agency co-operation required to be successful must be reflected in layered targets and KPIs, with the individuals and organisations being held accountable only for that which they can address and control.

The ambitions set out in this strategy need government to address the commercial barriers to recycling which must be openly and honestly discussed if we are to be able to act and collectively succeed. More detail is offered below in our answers to the questions posed in the waste chapter.

To achieve the policies and proposals in this strategy, which organisations should the mayor call upon to do more (for example central and local government and business) and what should the priorities be?

The policies and proposals in this strategy require significant change and all agencies whether government, voluntary, business or individuals are required to play their part. Waste has universal reach in that it touches every part of society, is impacted by any business that produces and sell commodities and has an effect upon every home and business.

To address the issues in the waste section the priorities should be **to reduce waste and increase productivity by giving recycled material a value**. This is no easy task and significant change will be required from:

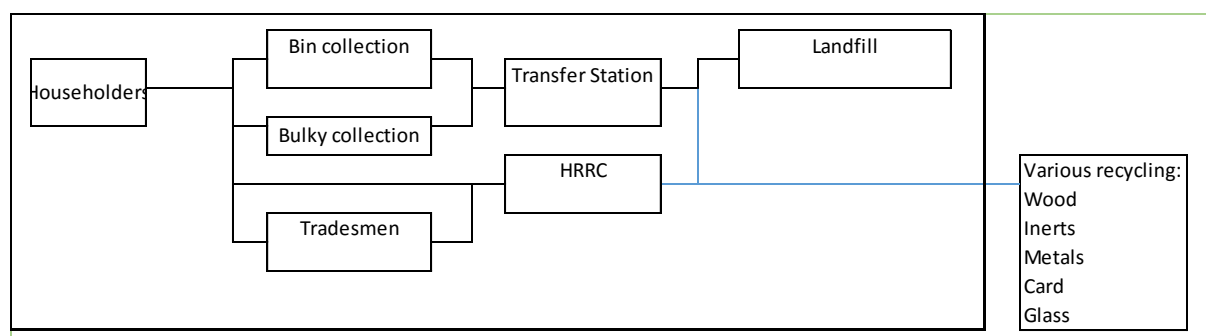
- Central Government,
- Local government,
- Waste Collection Authorities,
- Waste Disposal Authorities,
- Private Sector Waste collectors,
- Private Sector Waste treatment operators,
- Planning Authorities,
- Housing Developers,
- Tenant Management Organisations,
- Residents Associations,
- Caretakers,
- Residents,
- Businesses

Government needs to either fund recycling or require Producers to fund recycling.

Planning Authorities need to insist that the ability to recycle is built into the fabric of new developments.

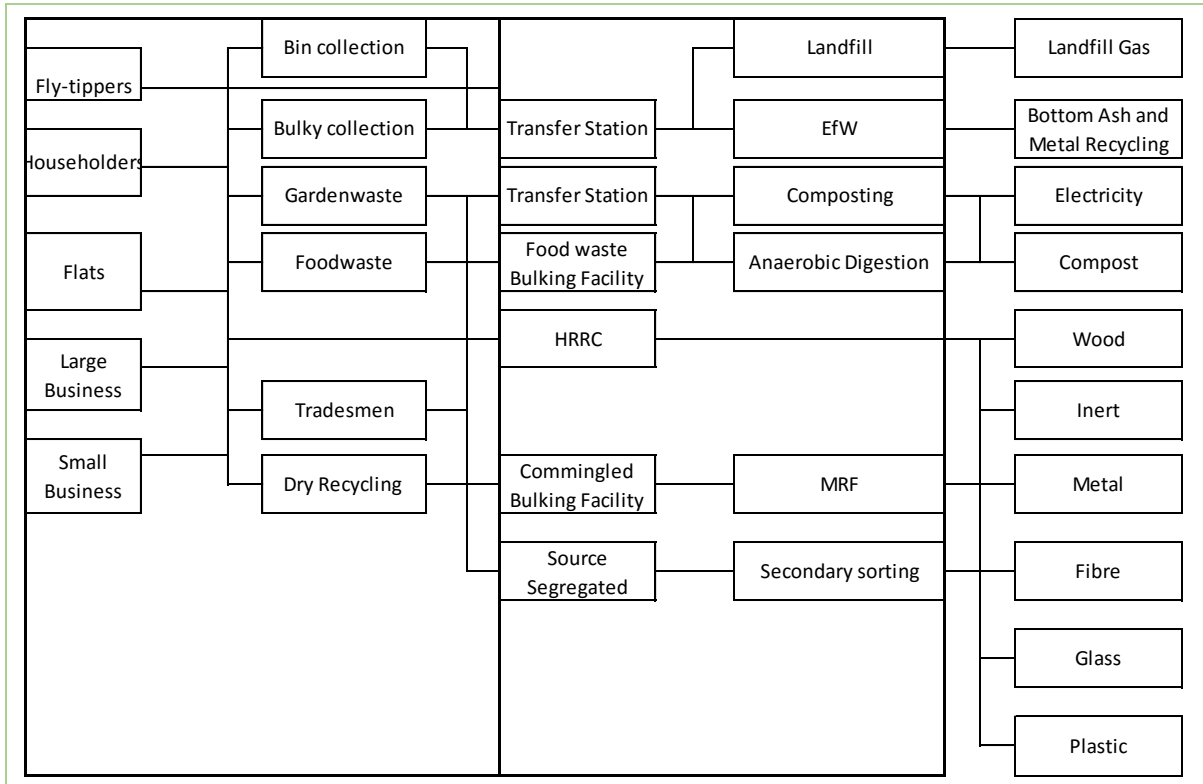
Strong organisational clarity will be vital to meet the scale of the task. Collection costs are increasing, the value of recycling has decreased and managing resources has changed from a relatively simple task:

Simple Waste management of the past:



into a much more complex operation:

Complexity of modern resources management transitioning to circular economy:



We need to be as efficient as possible and ensure that the waste collection authorities, the waste disposal authorities and Lwarp are taking on different tasks and pulling in the same direction, not cross cutting each other.

Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?

Yes, except light pollution.

There are a number of targets and milestones in this draft LES, what do you think are the main key performance indicators that would demonstrate progress against this integrated strategy?

Reaching targets needs individuals and organisations to know and report their own critical success factors. Our answers are limited to reporting against the targets set out in the waste section from the perspective of waste authorities and our counterparts in the private sector to describe what WLWA considers to be our contribution to the ambition that is within our control:

a) No biodegradable or recyclable waste to landfill by 2026:

Using waste composition analysis on waste being sent to landfill to calculate:

- tonnes per annum of biodegradable waste going to landfill,
- tonnes per annum of recyclable waste going to landfill.

Recyclable waste should be defined as the target materials for a standard Materials Recycling Facility. This does not include mixed plastics also known as pots tubs and trays.

b) 65% waste will be recycled by 2030:

Waste Authorities should be asked to report

- i) the number of households which do not receive a collection of the minimum standard of recycling collections and
- ii) kgs per annum of household waste measured as:
 - o kgs per household per annum for residual waste,
 - o kgs per household per annum for dry recycling, and
 - o kgs per household per annum for composting waste

Commercial waste operators should be asked to report

- i) the number of customers which do not receive the minimum standard of recycling collections and
- ii) kgs per annum commercial waste measured as:
 - o kgs per customer per annum for residual waste,
 - o kgs per customer per annum for dry recycling, and
 - o kgs per customer per annum for composting waste

What are the most important changes Londoners may need to make to achieve the outcomes and ambition for this strategy? What are the best ways to support them to do this?

It will cost more to achieve the outcomes and ambition of this strategy and Londoners will need to agree to spend more to achieve it. The Mayor will need to find a way to provide financial support.

More land will be needed to sort and transfer waste and recycling. Large commercial and residential developments need to include and pay for space for sorting and transferring waste on site to prevent unnecessary movement of waste within London.

Waste

Do you agree that the Mayor’s policies and proposals will effectively help Londoners and businesses to recycle more?

The Mayor’s policies and proposals set a strong direction but to effectively help Londoners and businesses to recycle more the Government must address the commercial barriers to recycling which include:

- Without market intervention it is cheaper to use raw materials than to use recycled products,
- Local Authorities are encouraged by targets to promote quantity of recycling over quality of recycled products thereby reducing the value of recycling further,
- Producers are incentivised to create cheap, disposable and non-recyclable products by a system which does not hold them accountable for recycling,
- Businesses are not required to recycle and won’t until it is genuinely cheaper and easier.

Objective 7.2 to maximise recycling rates: The London Waste and Recycling Board should actively participate in increasing commercial recycling in London, working closely with commercial waste companies to collect commercial waste data eg Commercial waste operators should be asked to report the number of customers which do not receive the minimum standard of recycling collections and specifically measuring commercial waste as:

- kgs per customer per annum for residual waste,
- kgs per customer per annum for dry recycling, and
- kgs per customer per annum for composting waste

Resource London's borough support programme to improve recycling rates and provide high quality and well participated municipal waste recycling services should be broadened to incorporate waste infrastructure through Local Authority sites.

LWARB should be making the case to central government for the need for Producers to play their part in improving recycling and reuse performance by insisting on the use and sale of recycled products. The most often asked householder question is "where does my recycling go to?" Until recycled products are sold in all of the shops in London, householders will continue to be cynical about their recycling efforts.

Policy 7.2.1 Increasing recycling rates for local authority collected waste in the manner described will drive local authorities to collected commercial recycling but unless the Mayor puts in place a methodology of monitoring recycling levels of commercially collected waste, this is likely to move recycling from commercial operators to local authorities rather than genuinely driving up recycling rates.

The original definition of NI192 "recycling rates" was envisaged to include reused waste and so to take account of waste reduction but the method is flawed because waste authorities reduce waste and reuse is carried out in charity shops, ebay, sharing economy, gumtree etc. Consequently waste authorities have money saving waste reduction programmes and a contradictory recycling target. If this persists the problems will be imported into commercial recycling data.

Scenario 1 below demonstrates how WLWA could reach a 65% recycling rate by collecting commercial recycling eg the LACW will rise from circa 650,000 tonnes per annum to over 1 million tonnes per annum. In the current recycling market this will increase the risk exposure of taxpayers to the recycling market without any real environmental benefit.

Scenario 2 below demonstrates how moving 20% of the organic waste found in residual waste and 10% of the dry recycling waste into the recycling and organics waste stream WLWA can only reach a 57.33% recycling and composting target. Scenario 2a demonstrates how this recycling rate decreases over time as householders reduce avoidable food waste.

Example: WLWA waste KPIs reflecting recycling, composting and the positive impact of including waste reduction

	NI 191 Residual household waste per hh per annum (kgs)	Dry Recycling waste per hh per annum (kgs)	Composting waste per hh per annum (kgs)	Reuse waste per hh per annum (kgs)	NI 192 % Household waste sent for reuse, recycling or composting	Waste reduced per household per annum relative to 2006/07 (kgs)	% Waste reduced, recycled or composted relative to 2006/07 baseline
2006/07	923.11	182.18	101.13		23.50%	0	23.48%
2011/12	586.50	233.25	147.32	Information not available	39.40%	239.35	51.39%
2016/17	544.54	219.91	128.81		39.10%	313.16	54.86%
2035/36							
Scenario 1							
Waste stays same, recycling trebles	544.54	659.73	386.43		65.77%	-384.28	54.86%
Scenario 2							
20% organic shift, 10% dry recycling shift	381.18	274.36	237.72		57.33%	313.16	68.40%
Scenario 2a							
20% organic shift and reduction, 10% dry recycling shift	381.18	274.36	137.72		51.95%	413.16	68.40%

If however the target for waste authorities is to achieve a 65% reduction, recycling and composting of household waste against a baseline set in 2006/07, scenario 2 puts WLWA at 68.4% with no impact of ongoing waste reduction programmes.

Scenario 2 is challenging. It requires significant householder effort to increase separation of food waste and dry recycling whilst taking on the imperative to improve the quality of recycling set out.

Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, cardboard, plastic bottles and mixed plastics) are collected consistently across London?

WLWA supports the idea of a minimum offer and has developed projects to increase food waste collection and increase the quality of recyclables collected. However, mixed plastics is not a current recycling grade. It includes material that is plastic but not recyclable and only a change in waste legislation or Producer Responsibility will change this. This is an important point because it is the targets promoting quantity over quality and the inclusion of non-recyclable material on specifications for recycling that has resulted in inefficiency, expense and opaque commercial arrangements which push more currently valueless plastics into the market. We should use the deliberate segregation of non-recyclable mixed plastics to demonstrate how much of the plastic produced isn't currently recyclable but note that it may not increase recycling performance in the short term.

Do you think the Mayor should set borough specific household waste recycling targets?

WLWA suggests the Mayor should set a standard 65% reduction, recycling and composting rate against a baseline set in 2006/07 as set out in the answer to the first question in the waste section. This is an opportunity to show leadership and correct a miscalculation which is resulting in damaging mixed messages about recycling.

What needs to happen to tackle poor recycling performance in flats?

Projects are needed to investigate the chain of events from end to end. Using the recycling materials market as a starting point and working back to the resident: Understand what is recyclable and only ask people to put effort into recyclable materials, Insist upon clean recycling material, placed in the right bin; Situate the bins in a place where they are easy and rewarding to use; Make it easy for the resident to segregate and dispose of different material streams, Build flats with space to easily segregate recycling in the kitchen.

To tackle this last point about making it easy for the resident, the planning system must be used to ensure that recycling behaviour is planned in to the design of the building, ensuring there is space in the kitchen for the separate aggregation of food waste and the minimum offer of recyclable materials. Ensure the waste storage areas are prioritised in the design to promote sustainability and recycling. Finally long term behaviour change projects are needed to support residents in their efforts to recycle.

What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?

An extended producer responsibility (EPR) scheme is needed, the reduction in single use packaging will not be effective if it is targeted on consumers. The producers of packaging are in control of the whole supply chain, have the skills and marketing departments to influence consumer behaviour and benefit from free disposal via waste authorities. The Mayor has an opportunity to work with business and create examples of world leading recycled product design. We attach a copy of our response to the government consultation on deposit return and return and reward schemes for information. An EPR scheme will have a negative impact on local authority recycling and composting rates, but not on a reduction, recycling and composting rate with a baseline set in 2006 as previously described.

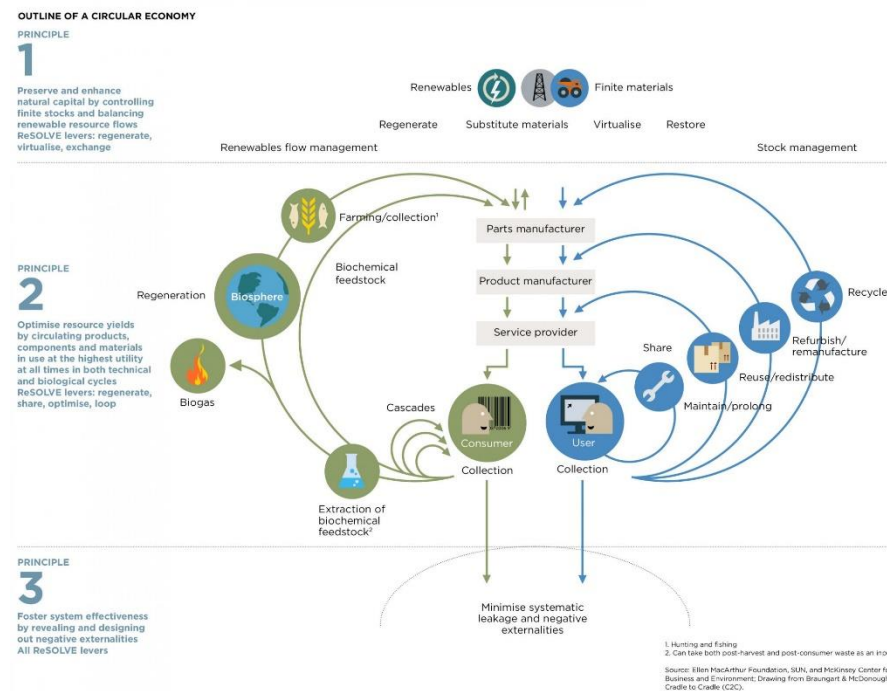
Please provide any further comments on the policies and programmes mentioned in this chapter.

There are a number of interesting and exciting proposals included in this chapter which have not been commented upon. WLWA is taking the opportunity to comment on items to note, suggested changes and improvements.

Most of the specific questions in this chapter relate to recycling which is unfortunate because it downplays the importance of waste reduction to delivering the aims and ambitions of the strategy. The chapter should explain the change from waste hierarchy to circular economy and demonstrate a commitment to waste reduction by describing policies which will bring about investment in the sharing economy and put pressure on the product manufacturers to take responsibility for the long term protection of the resources they use and sell.

The many ways in which this chapter focuses on the waste hierarchy and recycling in particular misses the opportunity of applying the circular economy and WLWA would like to see the links between the chapter on circular economy and waste made clearer. In the diagram below which has been taken from the Ellen MacArthur foundation website, recycling sits on the outer ring of the circular economy which means that recycling should be an area of last resort when adopting a circular economy model or used as a stepping stone to the inner rings of the circular economy. This is why increasing waste reduction counteracts the recycling target as currently calculated and why Waste Authorities and waste companies will not be able to demonstrate that a single activity which increases recycling also reduces the environmental impact of waste activities.

ELLEN MACARTHUR FOUNDATION Circular Economy System Diagram



WLWA believes that **Objective 7.1** is too narrow and should be shortened to say “Drive resource efficiency to significantly reduce waste.” Sitting in the inner rings of the circular economy this objective should not be limited. In addition to the chosen focus on food waste and single use packaging, the Mayor needs a policy to work with producers to address the increasing amount of low quality disposable waste preventing reuse. WLWA’s waste minimisation team focuses on five key items for waste prevention: food waste, textiles, waste electricals, furniture and nappies. Of these, textiles, waste electricals and furniture face double challenges in that increasing amounts are thrown away and are of reduced quality, increasing waste and preventing reuse. The Mayor through LWARB or Resource London could do some heavy lifting in this arena to support the waste authorities work on waste prevention.

The waste authorities have been working for many years to prevent waste because the most effective reuse and repair takes place before an item is discarded. Extended producer responsibility is the most productive method of creating jobs through reuse and repair without contradicting the other ambitions of the environment strategy.

Objective 7.3 Reduce the environmental impact of waste activities should be the next objective in the list to give a sense of hierarchy.

Objective 7.2 to maximise recycling rates has been covered in our answer to the first question in this chapter. In addition; a policy to collate waste compositions from the commercial waste sector to analyse and understand the true levels of commercial waste recycling would be a catalyst to create more recycling infrastructure in London. Policies committing to bring together the waste industry, waste authorities and producers to make packaging more recyclable would enable Londoners and businesses to recycle more.

Objective 7.4 WLWA strongly supports the policy to maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces. Using circular economy thinking, the role of the waste authorities is to facilitate new ways of working, new behaviours which will ultimately remove waste from our influence. Resource London's borough support programme should be broadened to incorporate waste infrastructure to improve recycling rates and provide high quality and well participated municipal waste recycling services through Local Authority sites.

London is not a self-contained island, it is a city which attracts workers, tourists, visitors and through passengers in addition to its residents travelling in and out of London on a daily basis. Products, materials and waste is imported and exported every day with the transportation, people, commodities etc. The Mayor has an opportunity to connect with other Mayoral regions to understand what the industrial strategy means for other regions and how London's resources can be offered as a valuable product, increasing the amount of much needed recycling infrastructure.

There are a number of reasons why policies trying to manage London's waste in London and expecting waste sites to achieve multiple policy aims has resulted in fewer waste sites in London now in comparison to the past:

1. Policies to try to retain the economic value of London's waste within London.
 - a. To achieve high levels of recycling, a significant amount of space is needed to sort waste into multiple streams of food waste, garden waste, wood, glass, metals, fibres, plastic and waste suitable for SRF, RDF and EfW etc. London needs to focus on using sites for sorting, not for treatment. By sorting commercial waste delivered in vans to local sites we can increase recycling and create dynamic enterprises within London. However, prioritising large scale treatment in London reduces the amount of space available for sorting and restricts dynamic enterprise.
 - b. It costs more in London. In a highly regulated industry, lowest cost is an indicator of most efficient and therefore lowest environmental impact. Sending waste to a treatment facility in London may be closer in miles but more expensive for example:
 - i. road journeys through London's domestic streets are slower and more polluting than a few miles more up a trunk road,
 - ii. more infrastructure (resources) is needed to operate in a London neighbourhood than in a more rural setting,
 - iii. additional energy is needed to manage odour in a London neighbourhood in comparison to a more rural site,
 - iv. additional road movements to take the by-products out of London after processing is complete are slower and more polluting than being able to divest locally where infrastructure is co-located.
2. Expecting waste sites to be able to satisfy all aspects of environmental policy.

- a. Property and rental prices in London continue to reduce the space available to sort and recycle waste. Expecting waste sites which are necessary but not always considered desirable by neighbours, to take on the development costs associated with carbon reduction, green infrastructure, reduced emissions etc. has prevented waste sites from being developed which then results in less sorting and therefore less recycling.
- b. If London is to have the best air quality of any major city by 2050, waste management activities in London will need to change. Reconciling the changes needed on air quality with the policies and proposals in the waste management section means that we need to reduce the number of movements London's waste is subjected to and prioritise efficiency over proximity. To this end waste sites in London need to be:
 - i. protected for waste use,
 - ii. sized according to the area they serve,
 - iii. focused on sorting London's waste quickly and efficiently into its constituent parts, and
 - iv. sending the right waste or commodity to the right place for treatment irrespective of distance.
- c. There is a risk that the planning system will be used to "green" waste sites, making them costly to run, leading to fewer waste sites resulting in less recycling and less waste reduction. The plan should guard against a drive to complicate waste sites, they should be developed to be adaptable, dynamic and responsive to improvements.

A point to note: If only 1 million tonnes of London's waste is landfilled currently, this is because of the RDF export market which creates energy from circa 1.5 million tonnes of London's waste for which there is no treatment infrastructure in the UK. Any disruption to the RDF market will see London's commercial waste going back into landfill and it is therefore highly unlikely that significant landfill closures will take place until infrastructure is in place.

Appendix

Letter in response to Defra consultation on Bottle Deposit Scheme:

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,
- Waste hierarchy; Materials captured before they enter the waste stream are more suitable for reuse,
- 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