

recycling and recovery UK

Waste and Resources Strategy for England

Summary of the main headlines

On Monday 17 December 2018, the UK government released 'Our waste, our resources: a strategy for England', its policy paper setting out how the UK will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.

The Defra strategy includes two parts – a main document and a technical annex with supporting detail and information.

SUEZ recycling and recovery UK has read both documents and constructed a series of headline content points that seek to itemise the huge range of topics, subjects and consultations that are planned over the next five to ten years.

We have been working on many elements covered in the document for a number of years, therefore considered the content of the strategy in light of this wider knowledge as well as the detail enclosed in both published documents. We plan to undertake further analysis of the content and respond to the numerous consultation documents due to be published early in 2019. In completing this, SUEZ seek to publish documents that will offer detailed analysis on elements of the content and these will be circulated in the new year.

In the meantime if you wish to discuss any elements of the strategy then please do not hesitate to contact us.

1. Extend Producer Responsibility (EPR)

- a. Review of the Packaging regulations (early 2019 Consultation, 2023 implementation)
- b. Review of the WEEE regulations (Consultation 2020)
- c. Review of the Battery regulations (Consultation 2020)
- d. Review of the End of Life Vehicle regulations (Consultation 2021)
- e. **Full net cost recovery**, including making sure local authorities (LA) costs are met for obligated items, including the costs of transition where they occur



- f. Demand stimulus through **30% recycled content** (April 2022 introduction, HMT tax, **Consultation** 2019)
- g. **Broaden EPR** to include additional products (bulky goods, carpets, textiles, tyres etc.) which will come forward in **consultations** for a number of these materials in 2022
- h. Use EPR to influence design (**eco-design**) to seek to minimise waste and make products more reusable or repairable (detectable black plastic, bio based plastics etc., will be considered as material types that may be introduced through eco-design)
- i. Seek to increase market and **data** transparency
- j. Seek to make targets and enforcements more visible
- k. Internet and other sales channels to be included to ensure ALL necessary parties are obligated
- I. Use **EPR to help control chemical use in products** and manage legacy chemicals and also to promote green chemistry
- m. Introduce **eco-design standards**, including promotion of products that can be repaired affordably and define minimum standards
- n. Aspire to seek to ensure that the UK has one system of EPR and a deposit return scheme (DRS) by working with the devolved authorities.

2. Collections of waste

- a. Collections organised to maintain and improve quality of materials collected
- b. Consultation on changes to waste carrier and duty of care regulations
- c. Food collection and green waste collection (2023 legislation) subject to a consultation, which will cover household and business waste
- d. Define a **consistent set of dry recyclable materials** to be collected for both households and businesses core materials to be defined and collected (**Consultation** 2019)
- e. **Improve urban recycling**, including consideration of household and business waste collection integration and new methods of collection
- f. **SME business cost reduction consideration** through high street or business district collection coordination
- g. **Improve working relationships between LA's** including looking at two-tier and unitary structures and payments (recycling credit review)
- h. Introduce a **DRS system for beverage containers** (**Consultation** 2019, implementation 2023)
- i. Seeking to incentivise back hauling or reverse logistics of packaging waste
- j. Seeking to introduce **minimum service standards for collection.**



3. Food waste reduction

The key elements in this section are as follows:

- a. Annual reporting of food surplus and waste by the food industry
- b. New food surplus and waste hierarchy to be applied
- c. Food waste champion to be appointed
- d. Mandatory targets for food waste prevention
- e. Eliminate food waste to landfill by 2030 (if other measures do not succeed)
- f. More effective redistribution of food to those who need it
- g. Promote awareness of food waste
- h. Support cross sector collaboration through the Courtauld 2025 agreement.

4. Crime

The key elements in this section are as follows:

- a. Reform existing regulations around waste description and management
- b. Reform waste exception regulations (high risk activities by 2020)
- c. Mandate the digital recording of waste movements (2020, stage one by 2019)
- d. Increase awareness of waste regulations and toughen enforcement and fines
- e. **Technical competence** reviews required for those describing, transporting or managing waste proposed
- f. Waste carrier, broker and dealer registrations require **tax registration** linked to the licence renewal process
- g. Strengthen intelligence on crime
- h. Create a **joint unit** for waste crime.

5. Measuring progress

- a. Generate new data on waste and resource flows
- b. Move away from weight based metrics, using carbon, natural capital and others
- c. Maintain the quality and extent of LA collections, including a review of free green waste collections
- d. **New** recycling (circular economy package) and packaging **targets Consultation** (recycling 50% by 2020, 65% by 2035, packaging recycling target 75% by 2030)
- e. More and better composition data, including measuring the composition of residual waste



- f. Municipal waste to landfill target 10% or less by 2035
- g. Revision of the Resource and Waste Strategy by 2023-2024.

6. Secondary resources

The key elements in this section are as follows:

- a. Use a life cycle approach for goods and products to assess their impacts
- b. Chemicals strategy to be introduced
- c. Level playing field for domestic and international reprocessing to be created
- d. Support the National Materials Datahub for full resource visibility
- e. Create and support a the remanufactured goods market
- f. Seek to improve the **quality** of plastics exported for recycling through the Basel and Stockholm Conventions (potentially through export controls and pre-authorisation; Norway has suggested that waste plastics be moved to Annex II Y48 which covers "wastes requiring special consideration" to improve control and management of these wastes)
- g. Support further **investment in resource efficient technologies**, including those through the Industrial Strategy Challenge fund (a fund designed to improve long term productivity and earning power in the UK, including food production, batteries and manufacturing)
- h. Encourage innovative waste treatment technologies that **create transport fuels** through the Renewable Transport Fuel Obligation (RTFO).

7. Waste producers / consumers

- a. Use **new labelling** to inform consumers of sustainability
- b. Ensure consistent collection of target materials
- c. Increase material efficiency for production and manufacturing
- d. Develop a **construction focus** for waste and design
- e. Support activities to minimise waste (eco-design, repair, buying habits etc.)
- f. Support markets for remanufactured goods
- g. Use government **green procurement** commitments to develop new services and businesses
- h. Extended warranties and guarantees to support reuse and repair sectors
- i. Consider household waste recycling centres (HWRC) for reuse promotion to maximise their effectiveness
- j. Deliver more reuse activity
- k. Ensure quality standards for refurbished and reused goods
- I. Introduce company reporting for reuse and repair activity



- m. Introduce a waste hierarchy for chemical waste
- n. Develop food waste reduction targets
- o. Through the agriculture bill, to seek to reduce waste at farms.

8. Treatment of waste

The key elements in this section are as follows:

- a. Seek to increase energy from waste (EfW) efficiencies
- b. Develop a move to products other than electricity (fuels)
- c. Anaerobic digestion (AD) and EfW to be treated as recovery to avoid landfilling waste
- d. Move to **ban food waste to landfill,** if measures don't significantly reduce food waste going to landfill
- e. Introduce a minimum Recovery R1 efficiency standard for all future EfW facilities
- f. Work with Ministry of Housing, Communities & Local Government (MHCLG) to enable opportunities for heat supply and grids
- g. Continue with the waste infrastructure delivery programme (WIDP) **£3bn investment** in new waste infrastructure to 2042
- h. Ensure 'fair competition' for recyclate exports
- i. Estimate municipal residual waste treatment needs to be **20m tonnes per annum** by 2035, after new recycling initiatives are introduced
- j. On-going role for landfill, especially for inert waste
- k. Closed landfill legacy issues funding and new review of closure and surrender criteria.

9. National and international

- a. Delivery of a Green Brexit
- b. Adopt most aspects of the European Circular Economy Package (EU-CEP)
- c. Deliver on the **new plastics economy** commitments
- d. Deliver on climate change commitments
- e. Seek to lead international community by example
- f. Continue support for WRAP
- g. Moving from a focus on waste to a focus on resource
- h. Ban plastic products where there is a need to, and if there are viable alternatives
- i. Support developing nations to deal with plastic waste
- j. Establish cross government oversight of the UK's national resource security
- k. Consultation on the transposition of the Circular Economy Package, 2019.



10. Proposed targets to be used to measure progress

- a. Raw material consumption
- b. Carbon footprint of waste
- c. Carbon footprint of consumption
- d. Carbon footprint of example shopping baskets
- e. Total waste generated
- f. Total residual waste per capita
- g. Household waste recycling
- h. Municipal waste recycling
- i. Commercial and industrial waste recycling
- j. Landfilling tonnes
- k. Tonnes of biodegradable waste landfilled
- I. Numbers of illegal sites
- m. Fly tipping activity
- n. Litter activity.

If you would like to discuss any elements of the strategy then please contact:

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