Appendix 3B - Local Waste Review - Call for Evidence Summary

The following summary is not exhaustive but represents the key issues raised by respondents to the Local Waste Review Call for Evidence.

Responses

54 responses received of which:

14 - Packaging/ food and drink/ material producer related	4 - Charity/ third sector
10 – Local authorities	7 – Waste network/ professional group
4 - Agency	9 - Other
6 - Waste partnership/ group of LAs	

Theme 1 Direction of travel on waste management

1.1a What are the current key challenges for LG and the wider waste industry?

• Funding pressure for LAs • Need to maximise income and efficiency • Uncertainty (politics, policy and Judicial Review) • Increasing quality of recyclate	• Move waste (LA collected and Commercial & Industrial) up hierarchy - prevention and reuse • Delivery of waste treatment infrastructure • Meeting recycling targets

1.1b How do you see the LA role in waste management changing to 2020 and beyond?

• Focus on waste hierarchy/ reuse • More partnerships with 3rd sector • More energy generation from waste • More competitive tendering • Working directly with retailers • More joint working/ integrated services • Growth/ jobs value of waste recognised	• More commercial trading • Better/ more responsive/ flexible contracts • Risk LAs get left with only low value waste • Waste seen as a resource/ circular economy • Providing incentives for recyclables • Greater focus on high quality recycling • More trade waste services

1.2 What is your experience of the role of LG in driving change?

• Massive change on recycling and landfill • Developed infrastructure to process more materials • Community leadership with cooperation of residents	• Value of clear targets and funding • Possible through working together/ integration • Varies across LAs • Challenges in two tier areas

1.3a What is the economic value of waste management on the local and national economy in terms of jobs, gross value added and material supply?

• Important for material security • Realisation of lost value and income	• Costs associated with producer compliance important to particular sectors

• Growth and local jobs available in a growing reprocessing sector • Need to map the social value of waste management	of the economy • Particular regions to benefit via recovery and reprocessing infrastructure • Potential for increase in renewable energy generation

1.3b What economic opportunities do you foresee for waste management within the wider economy to 2020 and beyond?

• Waste management a key area for green growth and jobs • Restrict export of waste/ recycling to preserve associated value/ jobs • Need more UK reprocessing capacity • Access to higher global commodity prices in coming years	• Need to retrieve value of material - treat as a resource • Energy and heat generation key opportunity • Savings for business becoming more resource efficient

1.4a How do LAs balance community wishes with the need to drive behaviour change (on prevention, recycling and re-use)?

• Effective communications and awareness raising is key • Enable communities to help themselves • Community wishes often in line with recycling more etc. • LAs well suited to drive behaviour change as trusted locally	• LAs have to manage community wish for more services • Value of actively respond to residents ideas and requests • Importance of agreeing overarching strategy/ rationale with residents • Make resident participation easy

1.4b What evidence do you have about the expectations of and satisfaction with waste management services of local residents?

• Regular surveys indicate high satisfaction • Wish for 7 days a week access to Household Waste and Recycling Centre (HWRC) • Residents happy with Alternate Weekly Collection	• Demand for collection of more recycling streams • Govt interventions on collection frequency can confuse the picture etc.

<u>Theme 2 Funding</u>

2.1a What are the key financial pressures/ cost drivers on delivery of waste management?

• Increasing cost of fuel/ energy • Energy from Waste (EfW) gate fees • Increasing cost of vehicles • Old non-competitive contracts • Increasing cost of landfill (incl. tax) • Uncertainty in economy and finance markets	• Uncertainty of recycled material prices • Cuts to LA budgets • Moving waste up hierarchy • Increasing cost of compliance • Cost of legislative change • Increase in waste arisings + households/ population

2.1b What opportunities are there for LAs to find savings and efficiencies in their delivery of waste services?

• Form partnerships and integration of service/ joint working • Route and transfer optimisation • Better procured contracts /avoidance of inflexible long term contracts • Removing non paid for trade waste	• Reduce collection frequency • More community run recycling facilities • Competitive tendering • More awareness/ education for residents to reduce waste/ recycle

2.1c What are the key opportunities for LAs to increase their income for waste services?

• Treat waste as resource/ extract maximum value • Partnership with retailers and producers • Better procurement and revenue sharing • Offer a trade waste service • Higher quality recyclate = more value	• Reduce waste to landfill • Increase recycling capture/ link to value • Trade material better/ have more flexible contracts • More use of Energy from Waste providing heat/ energy

2.2 How can greater value for materials be secured both by LAs and the wider waste industry?

• contracts with profit share for value of recyclate • Greater quality of materials • Fairer share of producer pays compliance for LAs • More effective partnership between LAs and reprocessors • Greater focus/ design of service around value of material	• Avoid sending valuable recycalte to EfW • Challenge of global market - fluctuation s in price • Risk of private operators cream off valuable material • Seek optimum solution of collection and capture/ income

2.3a What role can (and do) councils have on waste prevention?

• Educate/ awareness with public/ national focus • Reuse facilities at HWRC • Labelling important • WDAs must be engaged • Need targets or measurement of success	• LAs procurement policy/ spec • Partnership working important • Review free garden waste collections • LAs lead by example

2.3b What are the barriers to greater mainstreaming of re-use?

• Behaviour, understanding and perception of public • Infrastructure / capacity (lack of) and practicalities • Better partnership working with Third sector • Cheaper to buy products new	• Quality and safety of Materials (standards) / Condition of items at end of use • Products are designed for single-use / limited lifetime / difficulty of repair • Lack of funding / government direction

2.3c What should central government do to bring about greater waste prevention and re-use?

• Onus on producers to minimise waste & make products better suited to reuse • Central govt needs to lead • Need clear definition of waste prevention and reuse etc. • Public sector should lead by example. Include in procurement spec	• National advertising/ media/ awareness. Plus Include in schools curriculum • Need consistent funding (like for recycling) • Resource tax / tax on single use products • Review Buy One Get One Free • Incentivise/ tax breaks for reuse firms/ 'pump priming' of initiatives

2.4 How would you suggest producers better contribute towards the cost of recovery/ disposal of their products?

• Extend/ reform/ make more transparent Packaging Recovery Note (PRN) system • Improving design of products to be reusable or recyclable • Guidance for consumers / consistent labelling • Better partnership working (e.g. Courtauld-style agreement) • Clear policy and backing from govt	• Producer responsibility for other materials (tyres, cigarettes, mattresses, carpets, chewing gum) • Producers using more recycled products (create more demand) • Cost should be shared amongst all supply chain participants

2.5a What are the opportunities and risks for LAs in charging residents for more of their waste services?

• Need to balance with incentives • Pay as you throw an option but diffucult • Need charge to link service with demand/ reduce demand public • Transparency in costs for waste services in council tax bill	• Charging could lead to increase in fly-tipping or more refuse • Charge for use of HWRC • Charging should link to improved service or circular economy • Issues about LG reputation/ alienating the public

2.5b What are the opportunities for LAs establishing or increasing a commercial waste offer?

• Has potential for LAs which are well placed • LAs should offer recycling services – in particular to SMEs • Not straightforward – involves competition with private sector • Income/ could offset costs for domestic service	• Co-collection of commercial waste in domestic round • Secondary to domestic - presents potential risk to local taxpayers • HWRC can offer paid for commercial service for SMEs

2.6 What are your views on the level at which landfill tax should be set post-2014 and how the proceeds should be used?

• Increase only with inflation • It should be reduced • It should continue rising at £8 per year • Greater transparency required on where this tax goes	• Redistribute some/ all back to LAs • Invest receipts in prevention and reuse • Use receipts for a public sector fund for waste infrastructure • Redistribute via reward system for LAs landfilling least

Theme 3 Regulation and enforcement

3.1a What impact would the suggested changes to EU waste legislation have for LAs and the wider waste industry?

• Need govt direction on meeting changes/ implementation • Issue of cost of requirements • More focus on reuse helps LAs prioritise • Focus on producer responsibility will move costs away from LAs	• Appropriate to focus on getting plastic out of landfill • Caution on use of economic instruments – could lead to increase fly-tipping • Risk of EU fines being passed down to LAs

3.1b What revision or improvement to existing and future EU legislation would you suggest?

• More extended producer responsibility • Changes should be driven by value of material recovered • Need to mandate use of recycled material by producers	• Replace landfill targets with residual waste minimisation targets • More leadership on implementation at national level • Limit/ revise end of waste protocols

3.2 What waste related regulation would you suggest keeping, changing and removing?

• Red tape challenge doing enough • Clarity on separate collection • Preserve current enforcement provisions • Remove need for local waste plans/ Joint Municipal Waste Management Strategies	• Revise packaging compliance PRN/ PERN system • More powers/ focus on fly-tipping • Revise permitting regs re acceptance of commercial waste and energy generation

3.3a Why should LAs have responsibility for designing and delivering waste services based on local circumstances?

• LAs best placed/ connection to residents/ local knowledge • LAs proven track record/ satisfaction/ trust • Local accountability • LA public health/ wellbeing role	• LAs appropriate role in pushing circular economy • LA role in balancing needs and views of area • One size fits all does not work • LAs most cost effective - access to land and resources etc

3.3b How can principles of local decision making be squared with the need for greater efficiency (for example joint waste services)?

• Joint procurement offers value to LAs • LAs need to offer flexibility on delivering local needs • Integrated service but local specifics on delivery • Improved info sharing needed between councils	• Need govt leadership to make waste management system more efficient • Importance of increasing consistency of service offered • Joint decision making should involve members

3.4 What monitoring and reporting would you suggest is kept and removed, and why?

• Current arrangements necessary to retain • Simplify current arrangements/ avoid double entry • Standard indicator needed on EU recycling target • Reform Waste Data Flow (WDF)/ reporting to be more efficient and data focussed as a business tool	• WDF database for LAs to use to record data - save time on double entry • Need for surveillance sharing on fly-tipping • Add end destination to WDF • Reduce reporting

3.5 Do LAs have the right powers on enforcement and environmental protection?

• More emphasis needed on education/ awareness first • Changes to Section 46 (Environmental Protection Act) a backward step • Right powers but perception they shouldn't be used	• Addition – fixed penalty needed for fly-tipping • Govt support needed • Sentencing more robust and consistent • Need resources to use properly

<u>Theme 4 Infrastructure</u>

4.1a What are the key challenges on planning for waste infrastructure?

• Public perception/ NIMBY issue • Coordination/ central/ regional planning needed • Finding suitable locations • Need to void over capacity of EfW	• Better pairing up with material supply chain • Finance availability issues • Inconsistency in planning decisions • Need for LAs to join up

4.1b How could the waste planning system more effectively enable infrastructure to be delivered while ensuring that local communities are able to have their say through the planning process?

• More education and awareness including information on technologies • More early/ better consultation with community • Important for community to feel some benefit • Make link between waste produced by communities and process to dispose of it	• More working together LAs and Links between WM and planners • Waste infrastructure could be dealt with at higher than waste planning authority level • LAs and inspectorate need to be better resourced re appeals

4.2a Do you think the delivery of waste infrastructure will be sufficient to meet the 2020 targets?

• Yes but is it in right place? • Important to link to commercial waste capacity • Difference between consented and financed for build • Overcapacity likely	• Need more AD • Important to recognise contribution to green economy • Need more government support

4.2b What are the key barriers in development of waste infrastructure?

• Public perception/ opposition • Planning system/ permission • Availability of suitable land • Uncertainty from govt policy (Judicial Review, landfill tax etc)	• Uncertainty on national planning policy • Finance availability • Availability of quality and volume feedstock • Inflexibility of contracts

4.3a What part should EfW play as a disposal outcome to 2020 and beyond?

• Important to limit - as bottom of hierarchy • Only if linked to Combined Heat and Power (CHP) and high efficiency • Too much capacity/ need direction/ coordination • Avoid exporting this waste	• Energy recovery important for energy security • No coordination of planned capacity • Need solutions for certain materials (some plastics) • Need to focus on carbon impact

4.3b What would be the right financial incentives regime?

• Incentivise CHP/ use of heat • Link incentives to waste hierarchy • Greater protection of PFI/ government backed intervention	• Capital incentives via Green Investment Bank • Incentivise efficient technology only • Transparency of LG funding via grants • No more tinkering