

Policy Position

RESOURCES & WASTE

2024

ADEPT

The Association of Directors of Environment, Economy, Planning & Transport

WHO WE ARE

The Association of Directors of Environment, Economy, Planning & Transport (ADEPT) is the voice of place directors who are responsible for providing day to day services including local highways, recycling, waste and planning, whilst preparing for the longer term.

ADEPT is a membership based, voluntary organisation with members across England. We bring together directors from county, unitary, metropolitan and combined authorities, along with sub-national transport bodies and corporate partners drawn from key service sectors.

ADEPT members develop long term strategies, investment and infrastructure needed to make their places resilient, inclusive and prosperous. They drive clean, sustainable growth, delivering the projects that are fundamental to creating more resilient communities, economies and infrastructure. These services include housing, environmental and regulatory services, planning, economic development, culture and highways and transport.

Background

It is timely to set out how we can work differently with the new government to empower local authorities to deliver more effectively and efficiently on the critical issues of the day - tackling the rising cost of living, reducing the market failures in the housing market, expediting progress towards net zero and environmental resilience, ensuring that 'place' plays a clear part in reducing the burden of worsening health inequalities. Our centralised and departmentalised system of government is not fit for purpose to tackle these issues effectively. By ensuring local authorities are properly empowered and resourced, they will be in a position to take forward the government's key objectives of strong economic areas founded on green growth, sustainable and resilient places, and inclusive, connected communities.

Making the case for place has never been more vital.

In our [Manifesto for Stronger Places](#), we call on the new government to commit to these strategic objectives:

- **Deliver ambitious devolution deals for local authorities in every area.**
- **Move away from short term competitive funding pots to a multi-year, simplified funding framework.**
- **Tackle geographical inequalities to promote prosperity, inclusion, and better health and wellbeing for all.**
- **Pursue sustainable growth that delivers green jobs and skills and protects the environment.**
- **Take a place-based approach to the challenges of net zero, adaptation, nature protection and recovery.**



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OUR VISION FOR THE FUTURE OF RESOURCES & WASTE

- That the UK can boast a world leading circular economy with fewer linear products and services in circulation.
- Widespread Extended Producer Responsibility (EPR) is enforced across an extensive number of products/services, driving resource efficient design, waste reduction and closed loop recycling.
- There are regular and consistent recycling collections across England, covering all main waste types, that all households can access/benefit from.
- A government led information campaign informs consumers and business on commitments and steps to more sustainable practices and the benefits of a more circular economy.
- UK consumers can make more sustainable choices when buying products and services because of better understanding and commitment to a strong circular economy.

OUR RESOURCES & WASTE PRIORITIES FOR THE NEW GOVERNMENT

ADEPT is ready and able to work with the new government to bring forward a more circular economy, improve incentives for creating more circular products and services and secure greater protections for the environment with regards to waste and resources.

We ask the new government to commit to rapid implementation of the existing Resources & Waste Strategy policies in a way that supports the government's commitments to green growth and jobs and a zero waste circular economy.

1 - Drive sustainable production

Through the rapid rollout of Extended Producer Responsibility (EPR) for packaging as well as textiles, absorbent hygiene products, WEEE, batteries and bulky waste, to directly incentivise resource efficiency, circularity and waste and carbon reduction.

Stimulate eco-design through key waste sector plans and adoption of a resource productivity target and encourage greater resource security by requiring greater recycled content and facilitating investment in UK reprocessing capacity.

2 - Tackle consumption, helping consumers make more sustainable choices

By adopting waste reduction, repair and re-use targets which will deliver green jobs and improved resource productivity. Regulate for a 'right to repair' and introduce fiscal measures to price raw materials to include the environmental costs of production, to make it easier and cheaper for consumers to choose to do the right thing.

Invest in a long term national communication campaign to influence consumer behaviour, without which Government's green economy and resource productivity ambitions will fail.

3 - Improve resource recovery and reduce impacts of waste on the environment

By giving councils the funding clarity, time for service transition and flexibility on refuse service frequency to ensure the success of Simpler Recycling in driving a step change in recycling performance.

Decarbonise the waste stream and wider economy by directly passing costs from the Emissions Trading Scheme to producers, in line with the 'polluter pays principle', incentivising them to develop decarbonisation pathways for their product streams.

Work with councils to develop cost effective, funded solutions for managing hazardous materials including Persistent Organic Pollutants, to reduce environmental harm.

BACKGROUND

The government's 25 Year Environment Plan (2018) recognised the inefficiency of our linear economic model and the environmental harm caused by the waste it generates. In 2018, the government published a Resources and Waste Strategy, outlining policies to preserve natural resources by minimising waste, promoting resource efficiency and moving towards a circular economy.

Since 2018 there has been a shift in emphasis in environmental policy, in particular with the publication of the Net Zero Strategy and a greater focus on decarbonisation. However, progress in England on implementing resource and waste reforms has been frustratingly slow. Clear policy and adequate resourcing have led Wales to become a world leader in recycling, whilst recycling rates have plateaued in England where policies have been delayed and funding remains unclear.

Councils maintained essential frontline waste services through the pandemic and continue to provide efficient services that command exceptionally high public satisfaction, despite a 26 per cent reduction in real terms funding for local government since 2010. There is always room to improve services, and plenty of scope to reduce the levels of waste and its contribution to carbon emissions and biodiversity loss. Local government sees the potential of the resource and waste reforms to achieve transformational change in moving towards a sustainable future.

This paper sets out our up-to-date perspective on the key steps required to shift towards a more circular economy, and the roles government, producers and local authorities must play to deliver them.



OPPORTUNITIES & CHALLENGES

1 - Driving sustainable production

Extended Producer Responsibility (EPR) - has been widely adopted internationally as a key circular economy tool, providing a clear financial incentive for producers to design their products to make it easier for them to be reused, dismantled and/or recycled at end of life. The previous government committed to introducing EPR for packaging from 2025 and to explore its use in other sectors.

ADEPT supports this ambition and also calls for:

- Packaging EPR to be introduced without delay.
- Rapid development of EPR schemes for textiles, absorbent hygiene products, WEEE, batteries and bulky waste (mattresses, furniture, carpets).
- Use of EPR Modulated Fees to drive down the fossil carbon content in products and to incentivise circular products/services.
- The retained public control of EPR Scheme Administrators to ensure they are delivering in the public interest and are integrated into the overall resource and waste system.

Eco-design - good product design can reduce resource use and protect our natural capital by preventing harmful chemicals from entering the environment through the waste stream.

There is little evidence of UK progress on driving eco-design. ADEPT would like to see:

- The government adopt a resource productivity target (as promised in the 2018 Strategy) and develop a roadmap for meeting the ambition of doubling resource productivity by 2050.
- Development of binding sector plans for driving resource efficiency and circularity in the seven key waste sectors highlighted in Maximising Resources, Minimising Waste.
- Clear plans for dealing with the legacy harmful chemicals requiring specialist waste disposal, addressing how this will be funded (e.g. producer levies).

Increasing recycled content - stimulates demand for recycled material as well as reducing primary resource consumption. In 2022, government successfully introduced a tax on plastic packaging with less than 30 per cent recycled content.

ADEPT sees this as a great start and is calling for:

- Further refinement of the Plastic Packaging Tax, to incentivise higher recycled content wherever this is possible.
- Expansion of fiscal incentivisation of recycled content to other materials/sectors (e.g. textiles).
- Focus on circular recycling, preventing downcycling.
- Development of a UK resource resilience strategy and creation of investable conditions for increased UK reprocessing capacity.

2 - Tackling consumption, helping consumers make more sustainable choices

Increasing re-use - has massive potential to improve resource efficiency and security, create green jobs and social value and reduce waste and its impacts.

ADEPT is calling for:

- National targets for re-use and repair.
- Regulation to require better product warranties and a 'right to repair' requiring producers to offer/support a repair service and spare parts in order to make re-use a meaningful option.
- Remove fees for returns and retailer takeback of end-of-life products (e.g. electricals).
- Remove VAT on parts and pre-owned items.

Price raw materials to include negative environmental externalities - enabling consumers to recognise the true costs of their choices, and incentivising producers to reduce the use of resources, particularly those that create the most damaging environmental impacts across a product's lifetime.

Product bans - government has taken a strong lead in removing some of the 'worst offending' single use products from the marketplace, i.e. those that cannot be reused or recycled, such as plastic straws, stirrers and microbeads.

ADEPT calls on the new government to adopt a more systematic approach, requiring producers to identify reuse and recycling solutions for their products and to regulate against those products that generate significant resource loss or environmental harm (e.g. disposable vapes).

Deposit Return Scheme (DRS) - the previous government delayed plans for its proposed DRS for beverage containers to tackle litter.

ADEPT considers that the scheme as proposed offers poor value for money and risks undermining publicly funded services and infrastructure established to deliver Simpler Recycling. ADEPT urges the new government to hold DRS in reserve, allowing time for the impacts of EPR and Simpler Recycling to be evaluated.

Labelling - ADEPT calls on government and producers to provide trusted information on products' environmental credentials to enable consumers to make informed purchasing decisions and encourage sustainable choices.

National communications campaign / consumer messaging - policies such as EPR will directly incentivise brands to encourage consumers to recycle. However, a long term, high profile, government backed campaign (similar to those for healthy eating or quitting smoking) is required to influence consumer behaviour and achieve government's ambitions for improved resource efficiency, re-use and sustainable purchasing.



3 - Improving resource recovery and reducing impacts of waste on the environment

Simpler recycling - this policy gives clarity regarding collection of waste from households and non-household premises. Knowing which materials are universally collected for recycling should make it easier for householders and businesses to separate out their waste, reduce contamination and help move England to a more Circular Economy model.

ADEPT welcomes the overall Simpler Recycling approach, but:

- The planned implementation date (1st April 2025) for non-household municipal waste adds unnecessary confusion and will drive up costs for businesses that rely on co-collection with household waste - this should be aligned with implementation for households.
- The 1st April 2026 implementation date for household waste is extremely challenging and ADEPT would welcome a more transitional approach with appropriate funding being put in place to support the transition.
- Government must provide clarity and certainty on New Burdens funding and EPR payments immediately, so councils and the waste sector can take informed investment decisions and move into a delivery mode.
- The inclusion of plastic films/flexibles from 2027 will create massive additional challenges, and needs to be planned for now.
- We encourage government to develop a UK resource security plan, and support investment in critical UK reprocessing capacity.

Chemical recycling - ADEPT welcomes this as part of an integrated approach to managing wastes, especially plastics and composites, but would not wish to see this developed to the detriment of current/closed loop material recycling activities.

Tackling carbon - ADEPT fully supports the need to decarbonise waste and recognises that inclusion of Energy from Waste facilities into the **UK Emissions Trading Scheme (ETS)** can play a key role. However, if ETS costs are applied to local authorities as major customers of EfW, then this represents a huge (£1bn+/yr) and volatile cost, threatening the financial stability of councils without directly driving decarbonisation. ETS can only properly achieve its objectives by putting cost incentives in the right place with a priority focus on reducing the production of fossil-based waste in the first place.

ADEPT therefore:

- Welcomes the government's intention to pass ETS costs associated with fossil-based packaging waste onto producers via the packaging Extended Producer Responsibility (pEPR) scheme - in line with the 'polluter pays principle' and providing some clarity on how expansion of ETS to waste will drive change and link to circular economy aspirations.
- Proposes that EfW operators be required to report non-packaging ETS liabilities to the ETS Authority by product type, to enable government to decide how to pass these costs directly onto the producers of that material.
- Suggests rapid development of EPR schemes or new product levies for other key fossil-based waste streams (WEEE, textiles, AHPs, carpets), creating clear decarbonisation pathways by passing ETS costs directly to producers.

Refuse frequency - the previous government proposed establishing a baseline in guidance of at least fortnightly refuse collection frequency. However, evidence shows that less frequent refuse collection leads to higher recycling, by encouraging householders to maximise the use of their recycling/food waste bins thereby leading to waste being managed higher up the waste hierarchy and less waste being sent for recovery and disposal. This will lead to lower EPR costs for producers as well as helping meet the recycling targets for packaging materials.

ADEPT's position is that residual waste collection frequency is a local matter which should be determined by local councils who understand their residents. ADEPT supports three or four weekly residual waste collections where there is a comprehensive dry recyclable and food waste collection in place.

Landfill ban

ADEPT supports the aims set out in the 2023 call for evidence for the near elimination of biodegradable waste to landfill from 2028. It is, however, essential that consideration be given to the current EfW infrastructure and future capacity limits and that it is recognised that landfill is still a method of last resort for disposal for some wastes especially if EfW facilities are down for maintenance.

It is inevitable that the increases in demand will lead to higher costs for EfW treatment, this pressure will be compounded by the financial burden of ETS in the same year.

ADEPT therefore asks that:

- A landfill ban is considered in the context of all the legislative changes to ensure that they are considered as a whole package.
- Consideration be given to the wider impacts of the inclusion of EfW within the UK ETS and ensure that landfill does not become a cheaper option as a result.

Persistent Organic Pollutants (POPs)

Whilst ADEPT is supportive of legislative changes to protect the environment from these materials, we believe:

- Councils should be consulted on cost-effective solutions for managing POPs waste, and fully compensated for the financial burden of achieving regulatory compliance.
- The introduction of producer responsibility must be pursued to protect the public purse.

Fly-tipping / waste crime

ADEPT supports tougher measures to deal with the issue of fly-tipping and would encourage a review of current enforcement powers and boundaries between local authorities, the police and the Environment Agency to allow a more cohesive approach to tackling the issue. We support the amendments to the sentencing guidelines, although the increase to the upper threshold Fixed Penalty Notice (FPN) demonstrates a disconnect with court process and there is a concern that defendants will opt for this route to mitigate their financial loss.

Amendments to legislation so that FPN generates an income which is ringfenced for work associated with tackling litter and fly-tipping is appreciated, however levels of income generated are not sufficient to deliver the services.

ADEPT therefore:

- Welcomes the progress that has been made on digital waste tracking and Duty of Care Legislation and Code of Practice.
- Encourages a wider communications campaign for the public to invoke awareness and behaviour change.



FUNDING

Local government has an excellent track record of delivering high quality, cost effective local waste services, but does so in the face of real financial challenges. During the 2010s, local government's overall core funding per person fell by 26 per cent in real terms, resulting from a 46 per cent fall in funding from central government being partially offset by local tax increases.

In facing these challenges, councils have focused on statutory duties and acute needs. Spending per person on children's social care has risen by 11 per cent, while spending environment services has dropped by over 20 per cent and spending on key services like transport and housing have fallen by over 45 per cent.

Local authorities, as waste collection and waste disposal authorities, are expected to play a pivotal role in delivering government's Resource and Waste Strategy, and its waste policies will have a multi-billion pound impact on council finances, so in order to ensure they are successful, ADEPT has identified the following requirements:

- **Maintain the 'polluter pays' principle** at the heart of waste policy;
- **Implement packaging EPR** to the planned schedule, ensuring **full net cost recovery** from producers;
- **Provide clarity to councils on EPR payments and New Burdens funding immediately**, to enable investment decisions and delivery of Simpler Recycling requirements;
- **Directly pass ETS costs to producers** to incentivise decarbonisation, support sustainable consumption choices and avoid exposing councils to unnecessary financial risk.
- **Develop a funded plan for the safe management of hazardous wastes** recognising that the recent trend of imposing unfunded new requirements on councils (e.g. for POPs in soft furnishings) is not a sustainable approach to managing environmental hazard.





- ADEPT members are the place making strategists and policy shapers across top tier local authority areas
- ADEPT members are specialists, delivering services and sharing best practice across key sectors including environment, planning, housing, transport and economy
- ADEPT members design strategies for the future, taking communities beyond 2035
- ADEPT members operate in networks, cutting through boundaries to work with partners across the political, public, private and community sectors
- ADEPT members provide opportunities to develop new talent, supporting the place directors of tomorrow

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