

## Response ID ANON-5BWS-XKDW-Y

Submitted to **Consultation on the Waste Prevention Programme for England: Towards a Resource-Efficient Economy**  
Submitted on **2021-06-09 15:56:49**

### About you

#### 1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason.:

#### 2 What is your name?

Name:

Wendy Barratt

#### 3 What is your email address?

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#### 4 Are you responding:

On behalf of an organisation

### About your organisation

#### 5 What type of organisation are you responding on behalf of?

If you are responding on behalf of an organisation, what type of organisation are you responding on behalf of?:

Local authority

If you answered Other, please state your organisation type:

#### 6 What sector is your organisation primarily active in?

What sector is your organisation primarily active in?:

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary and metropolitan authorities, along with Directors of Local Enterprise Partnerships and corporate partners drawn from key service sectors. ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK. We deliver the projects that are key to unlocking broader economic success and creating more resilient communities, economies and infrastructure.

Please provide your 5-digit SIC code, if available (<http://resources.companieshouse.gov.uk/sic/>):

#### 7 If you wish, please provide your organisation's name

Organisation name:

Association of Directors of Environment, Economy, Planning and Transportation (ADEPT)

### Our approach

#### 8 Do you agree or disagree with our choice of outcomes and impacts as the right goals for us to be aiming to achieve?

Disagree

If you disagree, please briefly explain why.:

ADEPT believe these impacts and outcomes are a positive step in improving our environment. The Waste Prevention Plan will ultimately help to deliver the aims and objectives of the Resources and Waste Strategy which is guided by two overarching objectives:

- To maximise the value of resource use; and
- To minimise waste and its impact on the environment.

This has a positive impact on us as a Local Government Network for many reasons. It firstly looks to improve the environment in which we live by focussing on the top of the waste hierarchy and preventing the waste from arising in the first instance, this will in turn decrease carbon emissions by lessening the waste arising within ADEPT's network. This has both positive financial and performance implications for us.

We hope this legislation will empower and change the mindset of the consumer away from 'throw away' to more sustainable purchasing practices, but also to embed the link between manufacturing and subsequently wasting resources and climate change.

This approach should be complimentary with the EPR and DRS principles being applied to packaging, WEEE, batteries and textiles by aligning the purchasing thought process of the consumer with the responsibility that is placed on the producer.

It should also be complimentary to the Waste Management Plan for England that looks to regulate policy around recycling and the disposal of residual waste and the Consistency in Collections for Household and Business Waste Proposals.

However, the WPP should seek to preserve natural capital. The aims must also include tackling behaviour change and recognising the vital role of well informed and educated consumers have within the waste management systems.

The impacts outlined in figure 3 are vitally important to address however, organic waste (food and biodegradable packaging in particular) need to be included. Whilst much is being done to tackle the problem of food waste, there is a growing amount of biodegradable packaging that cannot be managed by the current waste management system and is causing confusion among the public. This can result in it being disposed of inappropriately, leading to a range of problems including loss of soil fertility (when organic matter is landfilled or burnt instead of composted) and contamination of soils by microplastics when people mistakenly put the wrong material in the composting process. There is currently no established best practice for the collection and management of biodegradable packaging and the WPP must work with the measures outlined in the Extended Producer Responsibility to deliver on this. The WPP should seek to establish an appropriate and wholistic circular economy for organic materials.

The omission of organic waste streams is also notable in the short section on natural capital (page 5) which states water, air and biodiversity as natural capital but omits the natural capital of both soil and geology:

- Soils: In order to have a circular economy for organic waste there must be a clear link with the UK Soils strategy and Bioeconomy strategy. Healthy soils are vital to food production and further work must be done to establish a robust and safe circular economy linking the waste industry with our natural systems.
- Geology: When looking at natural capital and a circular economy it is also important to understand the role of geological resource in providing a wide range of natural materials that can be used for building/construction and providing essential metals and minerals for our high-tech industries.

The outcomes outlined in figure 3 do correctly address the important element of eco-design and measures to help consumers make informed decisions and access reuse and repair services. However, consumer desire drives consumption of products, therefore reuse and repair must become desirable options. Whilst there is a growing interest in repairs and reuse, it is still not mainstream and the WPP does not put forward any measures to address our consumer driven culture.

## **9 Do you agree or disagree that our policy approach covers all the areas for action that are needed?**

Disagree

**If you disagree, please explain what is missing.:**

The policy approach covers significant ground with areas for action, but we feel that there is a lack of explicit recognition for educating the consumer appropriately within this section of the plan. It is mentioned further on in the Plan, but we feel consumer information and education should form a pillar in your approach to Waste Prevention. The consumer is a key stakeholder in the supply chain, they drive the supply and demand. How will this be communicated to the consumer going forwards, how do we ultimately change consumerism?

Data collection and regulation in the construction and demolition sector has historically been poor. Within Figure 3: Our Approach to Waste Prevention you specifically mention 'Improve quality of local authority data' but what about data managed within the construction and demolition industry? This would need to be significantly improved to evaluate the aims set out in this plan for construction and demolition waste.

The approach to policy outlined in the WPP focuses on specific sectors (outlined on page 12), but this approach will miss a number of areas that could be 'quick wins' such as banning unnecessary disposable or novelty products e.g.: cheap poorly built plastic toys. This would not only save resource but provide further signals to consumers and businesses about the shift away from a consumer and disposable based economy. The systems outlined under outputs: policies in figure 3 states 'improve the quality of local authority data' this would fit better in the 'information and data' category and should be extended to include the data provided by the commercial and industrial sector.

## **Designing out Waste: Eco-design, Extended Producer Responsibility and Consumer Information**

### **10 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?**

Agree

**Please provide details / explain your answer:**

ADEPT agree with the overall aims set out in this chapter, we hope that in practice EPR and eco-design requirements do indeed holistically incentivise the private manufacturing sector to move away from solely increasing the wealth of their shareholders to making more sustainable design choices.

What will happen to business that rely on the material currently reprocessed? I.e. car manufacturers who use reprocessed textiles to fill car seats may be forced to return to using virgin materials or less environmentally friendly alternatives?

How will we regulate eco-design requirements for imported products? Are there eco-design requirements internationally, is there anything we can learn from existing regulation?

## Reuse, Repair, Refill, Remanufacture: local services & facilities

### 11 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Neither agree nor disagree

**Please provide details / explain your answer :**

The aim includes refill, but the measures described in the chapter focus on reuse and repair and make no mention of how to support or increase the take up of refill systems and the development of new business models to promote refill.

The aim refers to having a well-functioning system of public, private and third sector organisations, yet the measures described focus heavily on local authority household waste and recycling centres (HWRCs). A significant amount of reuse and repair is delivered by the private and third sectors and it is not always related to the HWRCs. A coordinated approach with third sector organisations would be helpful and beneficial.

The proposals rely on encouraging, promoting, supporting, sharing best practice and providing guidance but there is no obligations or funding to support the required changes. Increasing reuse at HWRCs is essential but local authorities, private and third sector partners need space to store items, staff to check and repair items, PAT test electrical items and contracts & agreements in place to support partnerships. All of this will require additional funding and support to facilitate change. However, there are already good examples of local authorities, private and third sectors working together within the reuse sector which can be drawn on to accelerate this work if appropriate funding and targets are put in place.

Within the reuse and repair sector there is an over reliance on unpaid volunteers and not enough investment in creating and sustaining jobs in the long term. Significant work is needed to engage with employers and educational establishments to provide training in repair skills to equip the work force for the changes required.

A shift to systems of reuse and repair will require significant behavioural change across our communities. EPR funds should be used to actively communicate the benefits of reusable/refillable packaging to the consumer to drive behaviour change and increase demand.

Authorities in long term PFI contracts that manage their HWRCs are restricted with regards to storage space and guaranteed minimum tonnage levels. Once bulky material enters a HWRC in some cases, it falls under the ownership of the contractor. The contractor then manages the disposal of the material and there may be no real incentive for the contractor to establish reuse arrangements on site. This has meant that Authorities in these arrangements are restricted to only really setting up reuse shops away from the Household Waste Recycling sites and this has proved problematic with regards to collection and storage of the material.

The increasingly widespread use of booking systems on Household Waste Recycling Sites may not allow residents time to peruse and purchase from a reuse shop during their allocated time slots. Existing booking systems may need adjustment to accommodate.

Extra costs for renting the shop and paying the staff that are needed have also discouraged these practices. Authorities would need to be reassured that EPR funding would cover the full cost of these activities whilst considering current contractual arrangements and penalties.

## Data and Information: from industrial symbiosis to research & innovation

### 12 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

**Please provide details / explain your answer :**

ADEPT support the idea of Symbiosis programmes however we think they need to be able to operate locally, regionally, nationally and internationally to accommodate all markets for manufacturing and retailing. The policy suggests Symbiosis programmes will be run through LEPs however we are concerned that this could limit the market/s and demand to just regional areas. Industries do not trade/consume regionally so the purchasing model needs to reflect that.

Improved industrial symbiosis may stimulate investment in our own reprocessing markets, allowing for the establishment of secondary markets for some of the materials that are currently more difficult to recycle and their markets are currently at an immature stage.

Additionally, it could assist in the decarbonisation of EfW. As mentioned in section 3 data limitations do not account for the upstream market potential delivered via the objectives of this plan and the subsequent legislation, this could have a beneficial but detrimental effect on the concept of industrial symbiosis.

To get the best value out of the proposed National Materials Datahub, Electronic Waste Tracking System and Product Passports, these new initiatives need to go further than either voluntary or statutory guidance and become mandatory recording systems.

It is unclear on the role that Local Authorities might play here. Might this impact on the way we report materials?

## Construction

### 13 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Neither agree nor disagree

**Please provide details / explain your answer:**

The measures outlined will help to achieve the overall aim, but the wording is too loose, using words like 'encourage' and 'explore'. For example, the statement that MHCLG will 'encourage' local authorities to take action through the planning process will undoubtedly have an effect, but an obligation would have a much greater impact.

There is no detail on requirements for 'green procurement' for commissioning organisations (including local authorities) for new builds to ensure the procurement process lends itself/favours more sustainable practices in construction. This is a missed opportunity.

The policy also needs to consider the impact of using materials that are less carbon intensive such as sustainably sourced wood rather than steel in terms of longevity and durability. Although we support the idea of being able to dismantle and reuse buildings we question if this may reduce the building's life span.

Reusing in the construction industry can increase project timescales and labour costs, new legal regulation is surely the only way to incentivise private developers to embrace this practice as opposed to building in the shortest possible time and selling said building to obtain the highest profit margin. Industrial symbiosis may help with this but ultimately consumers currently would need to be willing to pay more to buy the building with reused building materials.

ADEPT feels some kind of incentive (both financial and corporate social responsibility) is needed to reduce construction waste and increase reuse of materials to encourage the construction industry to utilise any Resource Exchange Mechanisms and the two schemes could work in harmony alongside each other. The financial incentive/support payment could be used to encourage developing sustainable homes and reducing the volume of waste material during the development and construction phases. As well as the buildings themselves, its also the wastage from furnishing – doors, baths, kitchen units etc. The slightest error or damage and the whole product is often thrown in a skip. Target years could be implemented to ensure that the sector overall achieves zero avoidable waste by 2050.

Could DEFRA go further by using legislation to require businesses and Local Authorities to embed these principles into their procurement processes?

## **Textiles**

### **14 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?**

Disagree

#### **Please provide details / explain your answer:**

The aim is, once again, very loosely defined and does not clearly state which negative environmental impacts it intends to address. Whilst the WPP talks about the need to address GHG emissions and water usage by the textile industry, there is no mention of tackling pollution from microfibers.

Whilst there are some good measures outlined, such as using EPR, the measures described do not go far enough and are in themselves unlikely to achieve the overall goal.

There is an over reliance on encouragement, voluntary schemes and initiatives which is at odds with the urgency of the agenda being addressed. Given the significant negative environmental impacts of the fashion industry and the pace of change required to reach net zero, the fashion industry needs to be driven by significant and mandatory policy changes and not reliant on voluntary agreements.

The measures described also fail to address consumer demand. Fashion is strongly linked to a person's identity and status, influencing how they view themselves and others which in turn impacts on their purchasing choices. Behavioural change campaigns and education have a vital role in influencing the behaviour of citizens and supporting the textile industry to make the required changes. EPR for textiles would be a welcome step towards addressing the issues that need to be resolved. The textiles market is unstable with contractors cherry-picking the materials they want – and charity shops as they are inundated – with the rest being rejected and sent for EfW / landfill. We look forward to the textiles EPR consultation in 2022 which we hope will focus on the product lifecycle and sustainable sourcing, waste reduction, reuse, and the education of consumers. The plan states that EPR funding would be used for supporting enhanced collection services. Presumably this will increase the quantity and quality of supply for the end reprocessing market and therefore generally smooth the volatility of this market?

The problem here is the dire need for a shift from seasonal trends to long life and sustainable living. A consumer choice that is largely driven by the fashion industry and social media. We need to empower and inform the consumer whilst avoiding Greenwashing practices.

H&M global collection programme is in no doubt effective. However, a different perspective on this is that the consumer actually purchases additional items that they may have otherwise made the informed choice not to buy because they feel less 'guilt' because they have brought their unwanted items back into store as an exchange and got a voucher for it. Again, it's the culture that appears to be the route of the problem and the thing that needs to change.

Improving the durability of clothing is definitely one aspect that needs to be looked at. However, the fast fashion culture would suggest that in some cases these garments aren't worn enough to end up in disrepair, again it's the culture that needs to change. Consumers can presumably choose to purchase a garment that is more durable than a comparator garment, however, the consumer is increasingly leaning towards the cheaper more disposable option. We hope that the mix of policies referred to will encourage change needed. Perhaps a business model for a clothes rental market could be explored?

As a Local Authority tackling the fast fashion culture and extending the life cycle of clothes will decrease the level of this material arising and the energy required to reprocess it and indeed the costs.

Where processed textiles are used almost as a by-product for use as insulation and industrial symbiosis would apply, tackling the problem further up the supply chain will decrease the amount of this material available for insulation and car seats etc. one would question what would then be used for these purpose whilst appreciating that it is right to approach this problem at the culture and design stage and push the material up the waste hierarchy.

We agree in principle with the potential for product design requirements as long as these requirements are mindful not to decrease the recyclability of these enhanced garments in the process.

## Furniture

### 15 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Neither agree nor disagree

#### Please provide details / explain your answer:

How will the Government combat the barriers to reuse with regards to perceived quality and fire safety labelling? Paper fire safety labels need to be sewn on not just a paper label that falls off and renders sofas and other upholstered furniture unsuitable for reuse. Quite often perfectly good and reusable furniture is smashed up by the owner and taken to site for disposal – typically wood in this instance. Is there a way to prevent this and offer the item if furniture for reuse prior to it being broken down?

Links to third sector organisations who help supply furniture for disadvantaged / low income families? More could be done here to link up with repair cafes/organisations in the community to prevent good furniture going to waste.

How will the Government combat the barrier that is storage space on site and in reuse shops to allow for increased reuse networks?

Will the minimum standards that the government proposes address sales tactics like 'Replace your mattress every 8 years' as this has not been helpful for the number of waste mattresses arising for Local Authorities to dispose of generally at high cost?

Reprocessing for mattresses is labour intensive, would the income derived from a potential EPR scheme be used to assist either in the costs of reprocessing or in developing a more effective and efficient technical solution or both?

We are assuming that the funding for encouraging Local Enterprise Partnerships and the proposal for Authorities to offer support to local businesses that adopt circular models would come via EPR?

## Electrical and Electronic Products

### 16 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Disagree

#### Please provide details / explain your answer:

As a Local Authority network, any policies that prevent WEEE from entering the residual waste stream is beneficial on a number of levels.

However, improving the eco-design and waste management solutions for electrical and electronic products will not address the fundamental issue of a growing demand for cheap EEE and the resulting over consumption of resources. Providing consumers with information and expecting them to make the right choice for the benefit of the environment is naïve given that price and desirability influence far more purchasing decision. With the electronic sector being one of the fastest growing sectors of manufacturing, and given its far reaching environmental and social impacts across the globe, it is essential that the demand for EEE is addressed through stronger policies and regulation, backed up by investment in alternative business models such as rental and shared ownership.

Furthermore, the term eco-design needs to be defined and have clear standards that products can be benchmarked against. Eco-design standards for EEE must enable repair and reuse over recycling. It is also essential to invest in workforce training and new business models to develop the reuse & repair economy.

The policy describes encouraging best practice in the collection of WEEE via kerbside collections and/or Recycling Centre bring site collections. There is no clarity on how this will be financed or put into practice, and local authorities will need to be consulted and inform any change in policy with regard to this.

Government propose to expand and improve the kerbside collection service. Additional improvement to this might be difficult to achieve. As a Local Authority Network we look forward to receiving further detail on the WEEE fund pilots. We do however appreciate that there is potentially significant amount of WEEE sitting in people's homes – typically unused in drawers – old mobile phones etc.

We think a barrier is the data issue and people feeling confident that their appliance will be wiped, and their data will not be used. Is there a service / guarantee that could be provided to reassure residents, enabling the capture of this material and the recycling of highly valuable resources?

The industry is fast-moving, driving people to want the latest gadget and therefore producing more waste. How do we address this without stifling technical advancements?

It is also often large WEEE items that are fly tipped. Responsible disposal of this waste needs to be communicated to residents. Education around waste carriers' licences and implications of a resident's waste being fly tipped would be helpful.

## Road Vehicles

### 17 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

**Please provide details / explain your answer:**

As a Local Authority the number of abandoned vehicles has a bearing on the amount paid to dispose. Policies to lightweight and increase the life cycle of a road vehicle could potentially lower Local Authority Costs.

## **Packaging, Plastics and Single-use items**

**18 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?**

Disagree

**Please provide details / explain your answer:**

ADEPT have responded to the EPR consultation and have expressed concerns that there should be an enhanced focus on the Waste Hierarchy and reusable/refillable packaging. This will also require a significant focus and investment in ensuring the infrastructure network to accommodate that is also funded by producers and significantly in place alongside other changes. Communication to the public is essential and should include detail on non-packaged and least packaged goods. This is imperative if the UK is to meet its targets.

We are also keen to ensure that any policy that is implemented that reduces packaging by light weighting materials takes into account the whole life cycle of that material and that there is a method and a stable market for recycling it.

We support the concept of recycled content being used in packaging providing this material can also be recycled at the point of disposal/being discarded by householders.

Research and innovation needs to be supported by infrastructure for its processing and, in line with the PPP, producers must be responsible for full net costs of dealing with their packaging.

The WPP appears to focus on single use plastics rather than all single use packaging and whilst the current and proposed measures are beginning to see a shift away from single use plastics, it is also having unintended consequences. For example, many businesses are swapping to compostable/biodegradable packaging without fully recognising the environmental impact of their actions and mistakenly thinking that they are being 'green'. However, their biodegradable packaging choices are often ending up in landfill/EFW plants and contributing to the emissions of GHGs or ending up in composting/AD plants where it does not break down appropriately and is considered contamination, creating inefficiencies within the systems. There is currently no established best practice for the collection and management of biodegradable packaging and the WPP must work with EPR for packaging to address this if the UK is to establish a truly circular economy.

The UK plastics pact targets that encourage an increase in compostable plastic packaging is at odds with what is stated in the modulated fees section of the EPR consultation. The EPR consultation states that compostable packaging will attract a higher modulated fee. The reference to compostable plastic packaging in the UK Plastic Pacts target does not fit with the Government aim in this consultation to shift away from hard to recycle material unless a further commitment to invest in innovation specifically for compostable plastic packaging is possible.

The measures outlined do not address the fundamental issue of societies over dependence on disposable packaging and high levels of resource use.

Government need to provide more support and investment for reuse and refill business models and not just consider alternative single-use materials. More emphasis on educating the consumer on their behaviour with regards to our over dependence on disposable packaging and littering. We need to encourage the public to use refillable containers and this would hopefully go some way to reducing the amount of litter without the implementation of an expensive DRS.

## **Food**

**19 Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?**

Agree

**Please provide details / explain your answer :**

ADEPT are pleased to see that the Government see the prevention of household food waste as a key area and that continued Government support will be available for consumer campaigns and behaviour change initiatives.

Legislation needs to be introduced to ensure businesses donate edible food and don't send it for disposal. In addition, donation of food should not be seen as a way of avoiding expensive disposal fees. Many food distribution schemes are struggling for funding and as such businesses should be encouraged to offer support recognizing the savings that they are making – a win, win situation. More detail would be appreciated regarding potential links to community fridges, food banks, apps like Olio and how these could link to businesses that would be legislated to donate edible food. Is there a need for a wider strategy looking to prevent food poverty when so much goes to waste?

Furthermore, there needs to be a clear link between the management of food waste and the UK Soils strategy and Bioeconomy strategy to ensure that the principles of a circular economy are applied to natural systems as well as industrial systems.

Further detail is required on what support LAs will be given on Behavioural Change Incentives (BCIs) financially as well as support with the assets and resources. Food waste is the biggest scope for household waste reduction and has the biggest impact environmentally and financially for the taxpayer. Support to LAs is vital to ensure BCI continue. BCIs need greater campaign investment on a national scale across all sectors so that all consumers are made aware of both the value of food and the consequences of food waste, rather than the current opt in.

Further detail is required on the link to mandating food waste collections and the proposals for minimum residual collection frequencies and how the measures proposed in this consultation document will harmonise with those within the Consistency in collections for household and business waste.

## **Monitoring & Evaluation**

**20 Do you agree or disagree with the described approach to monitoring and evaluation of this Waste Prevention Programme?**

Disagree

**Please provide details/explain your answer:**

Reporting on the metrics listed in the WPP needs to be backed up with a mandatory requirement for all sectors to provide data for the identified metrics at regular intervals.

There are no clear timescales for the overall implementation of the WPP. It would be helpful to have a graphical/pictorial representation of when all the various workstreams contained within the plan are likely to take place.

The data source for the number of enterprises in the reuse and repair sector relies on the annual business surveys and registers, but this will not provide an accurate picture of the work going on in voluntary/third sector.

There is no commitment to develop and include data to monitor and evaluate consumers awareness and the impact of waste prevention and behavioural change work. This is an area that is poorly understood in relation to metrics and the WPP would benefit from identifying an agreed way to measure the impact of this work.

**Consultee Feedback on the Online Survey**

**21 Overall, how satisfied are you with our online consultation tool?**

Satisfied

**Please give us any comments you have on the tool, including suggestions on how we could improve it:**

Not specifically for this consultation, but for others where questions only allow you to comment if you disagree for example, it is really hard to enter what we as a stakeholder feel are valid comments. Please could there be a comments box for all questions regardless of whether you agree or disagree with the proposals.