

National Association of Waste Disposal Officers
(NAWDO)

Rt Hon Rebecca Pow MP
House of Commons
London SW1A 0AA

This matter is being dealt with by:
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Date: 2nd July 2021

Dear Minister Pow,

Consultation on Consistency in Household and Business Recycling in England

On behalf of the National Association of Waste Disposal Officers (NAWDO), I would like to extend my thanks to your policy team for the open-minded and inclusive approach taken to developing this policy over the last few years. Your officers have worked with a broad range of organisations, including NAWDO, to identify the complexity of turning waste into resources and create a route map for the future. We are very grateful for their efforts to date; however, we note the current proposed timetable is challenging. NAWDO broadly supports the principles that underpin the Consistency proposals, however there are areas of concern which must be addressed. NAWDO would be pleased to continue working with Defra colleagues to develop a strong, forward-looking and coherent plan.

NAWDO members and their officers are experienced and knowledgeable regarding service designs, processes and systems of collection and delivery of infrastructure; the officers bring wide and significant experience to the table from many local authorities and have identified the key areas below to be brought to your attention with regard to consistency agenda.

Current Recycling and Composting Performance levels - Local Authority efforts on waste reduction and recycling has largely brought us to where we are now, together with Government we should be taking the next steps. As local authorities we must also serve the needs of local communities, manage the environmental cost of this vast activity. Collaboration will be essential to the success of the consistency proposals. For many years, local authorities have implemented national, regional and local communications campaigns. This has not resulted in a step change in performance and or consumer behaviour, even in terms of those materials that are deemed easy to recycle. Waste going to landfill has been going down, national waste

dataflow reporting also shows this to be the case, *the* continued landfill comparison is a thing of the past now, the UK has already reached the target of max 10% Municipal Solid Waste to landfill.

Recycling needs to be made easier for both householders and businesses. A clear and consistent label for both “Recycle” and “Don’t Recycle” for consumer and businesses would help minimise confusion for all, and most importantly the consumer. This will reduce the need for more nuanced communications and help towards realising the ambitious proposals.

Reduction – In line with the Waste Hierarchy, we urge Government not to forget about the importance of waste minimisation and reduction and to ensure that its promotion is captured as a critical part of all the forthcoming legislation. The Waste Prevention Programme for England currently out for consultation sets out a number of policies and frameworks but fails to set waste reduction targets. We feel that this should be the Government’s flagship programme, but it is currently treated as a bolt-on.

Transition and Funding – the timetable is ambitious and will require Local Authorities to start planning now for the implementation date of 2023. However, various funding streams from EPR and any additional Burden payments may not be available for some time. Local authorities need assurances that new burdens will be fully funded. These assurances are especially urgent given the short time frame for implementation. Government is bringing in significant changes without providing detailed financial models and with local authorities having challenging timeframes to prepare. Nevertheless, the significant changes proposed by Government and the ambitious timelines have concerns for local authorities as we are still recovering from the COVID-19 pandemic, resources are constrained including the material, plant and equipment supply chains. Lead in times and costs have significantly increased during the last six months.

There are a number of potential new burdens highlighted in our detailed response as well as other cost considerations, which also need to include unintended consequences on the street scene such as littering and fly tipping. We further note that funding proposals are subject to confirmation in the next spending review, which is likely to be a highly challenging one due to the extraordinary situation that the public sector and country finds itself in.

Empowering Local Authorities

It is important that local authorities are granted the flexibility to be able to decide what is the most appropriate solution within the local context. In order to improve recycling rates, it is necessary to place obligations on the individual or institution best placed to control the waste presented (whether that be householder, the landlord or the managing agent). We understand that the requirement for separate food waste collections from flats may be delayed beyond 2023, in line with concerns expressed

by many within the local government sector that communal systems for flats are frequently not viable and on-street communal systems would be impractical. Residents and businesses need to use their services correctly to enable high quality separate collection of all recyclable materials, this is a key issue for improving the recycling rate. We would request that Government works closely with local authorities in order to clarify the tools which will be available for local authorities when behaviour change communications are not delivering the desired outcomes.

Business Recycling

The legislative framework does not currently exist for local authorities to franchise commercial waste. Local authorities are best placed to procure zone / phasing services within the administrative areas, unless an entirely new organisation is created. These are models in place elsewhere for example New York, Netherlands etc. It is important that local authorities are granted the flexibility to be able to decide what is the most appropriate solution within the local community areas. Many of NAWDO members support the proposals for zoning and phasing for commercial / business waste. This will also enable local authorities to consider emission and air quality issues for their communities, even more so in urban /city areas. Small and micro business are less likely to know or understand their legal obligations regarding waste, especially when these new requirements to recycle and separate waste are introduced. This forms part of the education activities that local authorities have could undertake. Should Government consider taking forward proposals to increase access for business to local authority services/ infrastructure (including recycling points), these would fall under new burdens. In addition, these would take a lead in time to deliver due the requirements related to the due planning, permitting and future assessment (TEEP) processes.

Government has set a target of 65% recycling by 2035, which is only slightly longer than the first term of the scheme administrator under the EPR proposals. All of the above points are crucial if we are to collectively achieve success and to go beyond recycling to develop closed loop and reuse solutions in a joint 10-year plan that sets out the proportion of reused, recycled and closed loop recycling. As always, NAWDO offer to work with you to achieve that common goal.

Yours sincerely,



Emma Beal
Chair of NAWDO