

National Association of Waste Disposal Officers
(NAWDO)

This matter is being dealt with by:
Gurbaksh Badhan
NAWDO Chair

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About National Association of Waste Disposal Officers (known as **NAWDO**)

NAWDO represent the interests of the professional officers with statutory responsibilities for waste disposal and treatment. With over 80 members NAWDO membership represents around 80% of all local authorities with waste disposal duties and includes London Boroughs, Joint Waste Disposal Authorities, Metropolitan, Unitary, County Councils and Combined Authorities from all UK regions except Scotland.

NAWDO welcomes the ambitions of the Resources and Waste Strategy, as well as the opportunity to contribute to the consultations. Our work in understanding the reforms continues we look forward to our continued engagement with DEFRA. Please find attached a response to each of the consultations and hope the below summary is also of help:

- We support the proposal that producers should be responsible for full net costs of managing packaging waste.
- The choreography and sequencing of implementing the outputs from the consultations are critically important for the best outcomes.
- The Government should also signal its long-term preference for how we reprocess recyclable material and consider the incentives that might be required to encourage investment in the right infrastructure in the right place.
- The Government should also signal its long-term preference for how we reprocess recyclable material and consider the incentives that might be required to encourage investment in the right infrastructure in the right place. Recognition should also be given where investment has already taken place at the local level, for example in mechanical biological treatment, energy from waste plants, with the support of past Governments. Any policy and/or tax changes to legacy systems will have a significant financial impact, it is not clear if these considerations have been duly considered in the impact assessments.
- Consistency' principles apply not only to councils' recycling collections but also to how packaging formats in the design and recyclability of packaging. The majority of councils are already collecting a set of dry recyclables, resembling proposals in the consistency consultation. The current differences in the collection services take into

account local geography and housing types and the investment in and availability of sorting and reprocessing infrastructure. Where there are substantial additional costs for councils in complying with the proposed set, these should be met by new burden funding and/or transition funding.

- The mandating of food waste collection means that all councils should receive new burdens funding to pay for this service, even if, they have previously been collecting food waste on a voluntary basis.
- Councils should continue to be allowed to charge for garden waste collection. In our view this waste stream is not, due to the mixture of different housing stock and socioeconomic factors. Charging for green waste supports the polluter pays principle, there is little evidence of garden waste being diverted to residual waste as a result of the charging.

The individual reforms will have an impact on each other, but these feedback or spill over effects are not explicitly articulated or mitigated in the consultation documents. We do appreciate a single Impact Assessment on the Government's four consultations has not been possible. We would urge this to be undertaken in detail to assess the interfaces between the reforms as there risks associated with unintended consequences. The links between the various reforms need to be made more explicit, enabling better understanding of taking forward any particular set of reforms. More work is required to understand and refine the reforms and we look forward to our continued engagement with DEFRA and WRAP on these matters.

In the meantime if you have any further queries, please do not hesitate to contact me.

Yours sincerely,



Gurbaksh Badhan

Chair of the National Association of Waste Disposal Officers

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