

**Environmental Targets Consultation (waste section) - North London Waste Authority**  
**Response**

Link to consultation: Consultation on environmental targets - Defra - Citizen Space

Closing Date: 27 June 2022

Reducing residual waste 1. Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'? [Agree/Disagree/Don't know] [If disagree] What reasons can you provide for why the government should consider a different target scope?

We agree in principle, but have some comments on the details of how this would work set out below.

It is positive that the Government has agreed to set targets in the Environment Act 2021, and we welcome that waste is recognised as a top priority. However, we feel strongly that Government's approach and the scope of the target needs to focus on driving the minimisation of residual waste at source, concentrating on producers and the measures they are taking to reduce materials in manufacture (as per the waste hierarchy). There is currently no clear roadmap included with the target for achieving this. The proposals to measure waste at the end point of its management and requirement for local authorities to provide data on this, seems to put a considerable onus on them. Despite this, they cannot influence waste created at source. Once waste is in the system and at the consumer level, the levers to reduce it are limited.

As referred to in the consultation document, we understand mineral waste in this context is defined as 'largely inert waste from construction and demolition, and excavation and mining activities'. We assume therefore, the definition does not include mineral wastes containing dangerous substances from physical and chemical processing which will be harmful to the environment.

As the target stands, we agree that harmless mineral waste should be excluded. As a waste authority responsible for disposing of the waste of 7 north London boroughs, we do not handle significant amounts of mineral waste. Excluding non-harmful mineral waste from the target allows for a focus on dealing with waste which has a greater environmental impact.

However, we would ask that Government consider what is being done to reduce all types of mineral waste (inert or not) and to consider whether the above target alone will drive the right behaviours in big business. From our understanding, the majority of waste produced by big construction companies/developers is mineral waste, and some of this may be harmful. Not having a target set to reduce it means the amounts sent to landfill will stay the same, which will not mitigate the environmental impact.

2. Do you agree or disagree that our proposed method of measuring the target metric is appropriate? [Agree/Disagree/Don't know] [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

We agree in principle, but have some comments on the details of how this would work set out below.

We agree that kg per person (by population) is a better method of measuring the target metric than on a per household basis. We believe this will allow for better benchmarking between local authorities.

However, we would recommend that the Government consider moving to a more sophisticated carbon-based metric in the future or introducing this as an additional measurement to be used in conjunction with a weight-based target as both kg per person and per household can be problematic measurement systems. Many areas have different dwelling types, spending power, demographics, and other socio-economic factors meaning that a single weight-based measurement system is flawed. The rising cost of living will only likely make this more pronounced.

Any measurement system/s, however, need to be consistent across organisations. It is currently unclear how details of the proposed measurement system will work, and whether Government will break this down by individual local authorities.

3. Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?

Councils are able to report good quality data, but this should be considered alongside additional burdens currently coming into force which will increase pressures on local authorities. This includes consistent collections, and the proposals for mandatory digital waste tracking to be applied to local authorities following on from other reforms to waste and recycling services, such as the introduction of Extended Producer Responsibility for packaging (EPR). The government needs to be clear about whether and when additional resources/ funds will be provided to support these new burdens.

Commercial and industrial waste also makes up for a significant proportion of overall waste. Local Authorities should not be the only bodies required to report waste data, and business waste (where a business employs above a certain number of people) should be subject to the same requirements. Government should introduce a system to capture commercial and industrial waste, and the responsibility for reporting this should sit with waste collection and disposal companies. Such a system for capturing commercial and industrial waste data will need to be sufficiently straight forward so that reporting will be accurate and timely.

The target applies at a national level. There is a danger that the public will assume that those collecting data have the sole responsibility for achieving progress – this is already the case in relation to recycling. Therefore, communication of data must be accompanied by clear messaging that the Government has the lead responsibility for achievement of the target.

4. Do you agree or disagree with the level of ambition proposed for a waste reduction target?

Government propose to reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels. It is proposed that this will be measured as a reduction from the 2019 level, which is estimated to be approximately 560 kg per capita.

As highlighted above, we believe it is positive that the Government have agreed to set a waste target and welcome ambitious targets if there is a clear and feasible route to achieving them.

NLWA feel that the roadmap to achieving this target is at present, unclear and undefined. Government needs to give greater clarity on the contribution required from different sectors and the pace of change that will be needed to ensure targets are achieved. System wide

measures and milestones must be set out, including commitments from the Government along with powers to help supporting bodies (including local authorities) to achieve the target.

The consultation paper states that changes set out in CPR are only expected to help achieve halfway towards the target. It states that meeting the 50% reduction target will require progress beyond the current commitment to achieve a 65% municipal recycling rate by 2035 and would represent a municipal recycling rate of around 70-75% by 2042.

There are no details outlining whether the Government will give additional funding and resources to help achieve either the waste target or the new proposed recycling rate. The Government must be clear about what additional responsibilities are likely to be placed on councils as a result, and what powers they will give councils to help achieve this. For example, giving local authorities the necessary funding and powers to make recycling compulsory would help. This would prevent valuable recyclables items being put into the residual waste stream and boost resources for the circular economy.

There also need to be a recognition that the 65% rate is an overall UK wide target, and different boroughs will contribute differently to this target depending on their demographics.

As emphasised above, ultimately, Government's approach needs to focus on the avoidance of waste in the first place, concentrating on producers and the measures they are taking to reduce waste at the source.