

Consultation on the Waste Prevention Programme for England: Towards a Resource-Efficient Economy

Chapter 1: Introduction

Q8: Do you agree or disagree with our choice of impacts and outcomes as the right goals for us to be aiming to achieve? Agree

- The consultation is right to highlight waste prevention as critical to delivering a truly circular economy. Waste prevention is at the top of the waste hierarchy. Therefore an ambitious and successful national waste prevention programme must play an important role in achieving sustainable resource use and contributing to tackling the Climate Emergency.
- We agree that the priority areas where waste prevention can be most effective and impactful are in the areas identified. These are consistent with the target areas identified by NLWA among other organisations.
- However, we are concerned that making progress on the scale which the country needs will require determination, focus and resources. There is also a need to have a clear escalation plan so that further action is taken – including regulation where necessary – where waste prevention goals are in danger of failing to be met.
- Specific comments are made in relation to the individual sectors. But we highlight that one of the key opportunities for Government is to build on what works. In this respect NLWA has established a series of successful initiatives which – with Government funding – could be scaled up both in London and nationally to tackle excessive waste. These include
 - the development of low plastic zones, <https://www.nlwa.gov.uk/campaigns-and-projects/low-plastic-zones>,
 - prominent campaigns to tackle food waste which have been picked up by national media <https://www.nlwa.gov.uk/campaigns-and-projects/save-crust>,
 - Events to promote clothes swapping which have “sold out” with demand exceeding available capacity <https://www.nlwa.gov.uk/campaigns-and-projects/swish-and-style>

Q9: Do you agree or disagree that our policy approach covers all the areas for action that are needed? Agree

- The policy approach covers all the subject areas that would be expected. The action on these priority areas needs to maximise the environmental opportunities, and in doing so generate opportunities for economic benefits and job-creation.
- We note that in 2020, US-based reseller, ThredUP, released research, which estimated that the re-sell market for apparel and footwear will be worth \$US 64 billion over the next five years. This confirms the potential for reuse to contribute significant economic value.

As well as specific actions related to individual waste streams, addressed in response to the individual sections, there are cross-cutting opportunities, using levers in the Government's possession, for strengthening progress on waste prevention. For example, Government could put increased weight in its own procurement strategies on use of recycled, repairable and sustainable materials and goods. This helps to build up the market and enables others to benefit from the lead which the Government sets.

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Q10: 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

- The range of measures have the capability to achieve positive progress in these areas. However, that depends on the Government setting demanding and ambitious expectations through product requirements and producer responsibility schemes. Being demanding and ambitious has to relate both to the pace and extent of progress. The consultation paper proposes selected pilots, working with a range of bodies. While it is right that the work should be well planned and organised, the consultation document does give the impression of the urgency needed to tackle all priority waste streams. Therefore the Government should develop action plans including timetables and target deadlines for progress. These should be published to help mobilise supporting organisations, such as local authorities and to enable success against aims to be measured. The action plans should include escalation processes for how action will be ramped up if progress is too slow.
- On more specific issues, standards around provision of spare parts, recycled content, durability, disassembly, repair and upgrade will be welcome in textiles and furniture, with the expectation of increased guidance on 'how' to repair. Working with UK suppliers could help to make the UK a leader in this area, which would put those companies in a good position to benefit as ecodesign principles become even more widely accepted and adopted.
- Informing consumers has to be a positive part of any programme. However, this is not a complete solution in itself. It should feature in the action plans we propose Government should develop and publish, alongside the other measures necessary to achieve waste prevention goals. - Similarly, extended producer responsibility is a valuable tool to incentivise those who generate materials to reduce the costs of disposal – including by measures such as reuse and repair which extend the life of products. The coverage of EPR should be expanded as proposed in the consultation paper to include textiles, bulky waste (especially furniture and mattresses), construction materials, tyres and fishing gear. Indeed EPR should also be considered for other difficult-to-recycle, small but copious goods such as plastic plant pots, cigarettes, chewing gum, wet wipes and nappies. NLWA brought together representatives of local authorities, businesses and academics for our annual Waste Prevention Exchange conference in March 2021 that focused on the long-awaited reform of the Producer Responsibility scheme for packaging and the potential impact of EPR for other materials. The message from specialists arising from that is, EPR must go further and faster if we are to address the climate emergency.

Chapter 3: Reuse, Repair, Refill, Remanufacture: local services and facilities

Q11: 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

- NLWA agrees that action at local level is the right focus. This is because the intended outcomes depend on working closely with communities and developing arrangements which respond to local circumstances. A blunt approach, dictated at a national level will not bring success.
- The intended support to local authorities is voluntary guidance on actions local authorities could take, encouragement to develop reuse hubs and guidance on data collection. However, given the well-documented pressures on local authorities, financial support would be needed to make the necessary progress. There are established and successful initiatives in local government – In the north London area there is a successful programme of proven initiatives on these issues. These include mapping and promoting repair cafes, organising events and seminars which enthuse and equip residents to reduce waste, a reuse shop alongside one of our reuse and recycling centres.
- These activities to be scaled up with Government financial support. Alternatively, for NLWA the Government could contribute to funding for our new North London Heat and Power Project, including world class recycling assets. Government financial support to meet the capital costs of that project would free up resources to enable more activity to be delivered
- We note that this section also includes a reference to working with regulators to explore improvements in legislation. We support this because ultimately legislation has to be considered if other measures do not achieve the more sustainable use of resources which is necessary. It is reported that currently the world is consuming 1.75 times the planet's long term resource capacity. There is a recognition that sustainable resource use is required to avoid depleting the planet's reserves for future generations.

Chapter 4: Data and Information: from industrial symbiosis to research & innovation

Q12: 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

- In general, the proposals appear rational and beneficial. However, NLWA does not have responsibilities which enable us to make specific comments as to how to optimise these areas.

Chapter 5: Construction

Q13: 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

- As the consultation notes, some 60 million tonnes of construction waste is generated each year. In addition to the embedded carbon and use of natural materials, the opportunity cost and transport impact of avoidable waste is significant. The Government should therefore go beyond publishing a routemap – it should set targets for progress and outline potential measures it would be willing to take to ensure targets are achieved.
- We welcome proposals that support a more sustainable construction sector. As an organisation currently embarked upon a £1.2bn construction project, the North London Heat and Power Project (NLHPP) www.northlondonheatandpower.london, we are developing experience in this area and demonstrating positive action which can be taken. We have BREEAM targets and embodied carbon targets. We have set contractors targets to reduce embodied carbon via refining the design and reducing the amount of steel being used. Contractors have also been required to undertake pre-demolition audits. The project material reuse rate to date is close to 50% which includes the reuse of soil and crushed concrete from demolition.

Chapter 6: Textiles

Q14: 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

- There are good ideas linked to the Textiles 2030 voluntary agreement and such an approach is beneficial as it stimulates industry to engage with the issues whilst generating ideas for tackling them. It may also allow for measurement of different approaches to compliance to be tested.
- NLWA agrees that an EPR regime for textiles should be developed as a matter of urgency. This should be consulted on as early as practicable in 2022 with rapid implementation following this.
- NLWA also supports the development of standards for clothing which is designed to last. This could be supported by improved labelling and improved consumer information at the point of purchase. Evidence from plastic bag charges suggest that price signals can also help customers make more sustainable choices, and it would be beneficial if the Government would provide some tax reduction, for example to support clothing made from partially recycled content.
- NLWA also supports the proposal for circular economy research centres and a central coordinating hub. Given the high profile of the fashion industry, progress with textiles could engage the public positively with the waste minimisation agenda. North London has a

vibrant creative sector and NLWA – as the second largest waste authority in the country – has the critical mass to lead waste prevention campaigns. It would therefore be a strong candidate for the location of facilities.

Chapter 7: Furniture

Q15: 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

- We agree that take back arrangements should be encouraged as a first step. However, it will be necessary to go beyond this to achieve the level of reduction in furniture waste which is needed.
- Therefore, as with our response on the question of textiles we also support the development of standards for furniture which is designed to last. This could be supported by improved labelling and improved consumer information at the point of purchase. We repeat our observation that price signals can also help customers make more sustainable choices, and it would be beneficial if the Government would provide some tax reduction, for example to support furniture which is made from partially recycled content.
- NLWA has provided funding for a number of research projects in the past investigating the potential for expanding furniture re-use in north London. Three reports have been published that provide relevant insight to this: Third Sector Reuse Capacity in London; Expanding and Encouraging Furniture Reuse in North London and Reuse Synergies; Opportunities in North London. A substantial scaling up of activity would depend on Government funding local authorities – this could be based on expanding existing successful initiatives.
- The introduction of EPR for furniture would be an important and impactful solution to strengthen circular economy principles for this bulky material. There is no reason to wait until 2025 for consultation on this issue – it should be taken forward in this Parliament with rapid implementation. NLWA’s annual waste prevention exchange this year focussed on EPR with an excellent presentation from Oakdene Hollins on EPR for bulky waste, including furniture, mattresses and carpets. The presentation notes that bulky waste is a problematic waste stream that currently incurs a net cost to local authorities because:
 - End-markets for recoverable materials and products can be poor.
 - Waste products may contain legacy chemical, including persistent organic pollutants or POPs.
 - Storage and transport costs are high.
- EPR fees would also be able to support initiatives including customer information and labelling to inform customers considering purchasing furniture and to advise on disposing of items in the most resource efficient approach.

Chapter 8: Electrical and Electronic Products

Q16: 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

- We agree that there should be a review of WEEE regulations to maximise reuse. NLWA undertook research in 2015-16 - a six-month trial of WEEE repair and reuse from five north London RRCs (focus on Large Domestic Appliances (LDAs) and cooling equipment) aimed to try and increase tonnage collected for reuse. By the time such items got to the RRC they were in a poor condition. A low proportion of what was collected was fit for reuse. Based upon the volumes passing through the sites in the six-month trial only 1.70% of LDAs and 0.46% of cooling appliances received at the RRCs were able to be repaired and reused during the trial. Large numbers of cooling appliances failed the visual inspection at the RRCs, with missing compressors being a major issue. There is public interest in having reuse areas at RRCs and getting the model right for this is essential.
- Kerbside capture can potentially provide better quality items that are more suitable for repair and reuse, but the process, systems and infrastructure must be appropriate to support that. It is easier to manage WEEE through kerbside collections as the item is registered for collection and can be designated for reuse and therefore should be handled accordingly. Ideally lifting equipment would be available for large WEEE to ensure it is handled carefully.
- The review of WEEE regulation should consider how to maximise items which allow for reuse in whole or part. There are some well-established third sector organisations that have been delivering programmes for WEEE recycling for many years and often in partnership with the private sector. Their knowledge should be drawn upon to inform this research.
- Space for storage of WEEE for repair and reuse is essential and currently infrastructure constraints inhibit it. Businesses should be supported to set up locally so that WEEE can be delivered directly to such sites rather than coming through RRCs.
- We support the proposals for maximising the positive impact of Government procurement, for developing ecodesign standards and for enhanced consumer information.

Chapter 9: Road Vehicles

Q17: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter? Not answered

Chapter 10: Packaging, Plastics and Single-use Items

Q18: 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

- NLWA argues for strong action to tackle single-use plastic. This includes support for comprehensive action to reduce plastic bag use, and we have previously written to Defra to argue for greater action, for example banning single use coffee cups, lids and non-recyclable polystyrene takeaway containers.
- Although there is significant public anxiety about the environmental impact of single use plastic (both as regards its disposal and the impact of production), this part of the consultation largely

relies on existing measures and notes at the end some actions that industry could take but does not suggest any drive in Government to push for progress.

- While the potential for reduction in packaging is less than the potential for waste reduction in construction and food it is an issue which has high resonance and extremely high visibility with the public. Therefore, the Government should set out stronger expectations and a route map for achieving them to reinforce the importance of waste prevention at the top of the waste hierarchy.
- NLWA welcomes the review of the Packaging (Essential Requirements) Regulations. A challenge currently is that the regulations are not well publicised and therefore unknown and not well used by people. Enforcement is the responsibility of Trading Standards – however, this competes with a wide range of other pressures for hard pressed trading standards team. In these revisions there should be a consideration of the resources needed for enforcement of the legislation. Potentially there is merit in incorporating this legislation into EPR where there would be a structural system to support it.

Chapter 11: Food

Q19: 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

- We agree with these proposals. There is a lack of awareness among members of the public of the scale of food waste. It is important to increase reporting to stimulate stronger action to waste less. We agree that mandatory reporting to consistent standards covering all elements of the food supply chain will increase focus on performance. Depending on progress which is reported, the next action would be to set targets for achievement to maintain or accelerate the reduction in food waste.
- Activities to promote public awareness – such as Food Waste Action Week and WRAP campaigns – are supported. However, these need to be done against the background of a comprehensive action plan on food waste with clear goals.

Chapter 12: Monitoring and Evaluation

Q20: Do you agree or disagree with the described approach to monitoring and evaluation of this Waste Prevention Programme? Disagree

- Monitoring and reporting are essential to understand if sufficient progress is being made and to allow increased intensity of efforts if goals are not being achieved.
- The proposed monitoring involves extremely broad-brush data generally at an economy-wide level. This does not provide the necessary disaggregated information to establish the success of sector-specific action plans. Therefore, the proposed metrics must be supplemented by collection and reporting of sector-specific data in the priority areas set out in the consultation. Only then can an effective feedback loop be created to establish how

quickly circular economy principles are becoming reflected in key areas and whether action needs to be increased to provide a proportionate response to the Climate Emergency.