

# GREATER **LONDON** AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2642

### Title: London Waste and Recycling Data Project

#### Executive summary:

This decision form seeks approval for £100,000 of expenditure under the Waste and Circular Economy budget for 2023-24 in the form of a grant to ReLondon on data analysis and support to help identify and promote best practice with boroughs, including reviewing the potential impact of proposed borough Reduction and Recycling Plan actions. The project is aimed at reducing waste, increasing recycling rates and supporting London's transition to a circular economy.

#### Decision:

That the Executive Director of Good Growth:

- approves up to £100,000 expenditure under the Waste and Circular Economy programme for 2023-24 comprising a grant of up to £100,000 to ReLondon in relation to its London Waste and Recycling Data Project.

#### AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

**Name:** Philip Graham

**Position:** Executive Director Good Growth

**Signature:**



**Date:**

18/09/2023

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1 The Waste and Circular Economy (WCE) team acts on behalf of the Mayor of London to undertake statutory functions on waste and London's transitions to a circular economy, in line with the Mayor's priorities set out in the London Environment Strategy (LES). The statutory duties undertaken by the team include reviewing local authority Reduction and Recycling Plans (RRPs); reviewing waste authority contracts and strategies; and overseeing the review of circular economy statements. In addition, action is taken to support circular and sustainable activities that reduce waste, increase recycling and reduce consumption-based emissions.
- 1.2 ReLondon (the operating name of the London Waste and Recycling Board; a statutory body created by section 356A of the Greater London Authority Act 1999) has the statutory objectives to promote and encourage the production of less waste; an increase in recycling; and the use of more environmentally beneficial waste collection and disposal methods in Greater London.. ReLondon intends to carry out a London Waste and Recycling Data project that will support waste authorities to deliver effective services that meet the needs of Londoners and deliver environmental benefits. This project is aligned to the Mayors priorities on waste and circular economy. Accordingly the GLA has agreed to provide grant funding to support the project. Whilst it is not the main aim of ReLondon's project, the project will help regional and local authorities better to understand London's progress towards meeting the Mayor's waste and circular economy targets.
- 1.3 The total WCE budget is £160,000 for 2023-24. Of this, £40,000 is committed through a contract with Praxis Sustainability Consulting Ltd, which provides technical advice for RRP, contract and strategy reviews (see [DD2600](#)).
- 1.4 London continues to have the lowest household waste recycling rate of all regions in England. This rate has stagnated over recent years and reduced from 33 per cent to 32.7 per cent in 2021-22 (the most recent data available). The LES includes a target for waste authorities to collectively achieve a 50 per cent recycling rate, for local authority collected waste (LACW), by 2025. However, London faces several substantial and ongoing pressures that will make it difficult to increase the recycling rate and meet the Mayor's targets. These include a significant number of new-build flats being constructed. In addition, the levels of ambition and action vary across local authorities, for many reasons, but there are still opportunities to improve outcomes through the adoption of best practice and innovation.
- 1.5 Influencing through its statutory duties remains the GLA's strongest tool to support improvement, driving change within local authorities and waste authorities. However, data to support this approach is patchy and outdated in places. ReLondon has recently reviewed data on LACW to estimate the composition of London's household waste and allow comparison with other areas in England. This has provided an estimate of how incoming national legislation and behaviour could impact recycling rates. Commercial waste is an essential component of London's waste system and has a significant impact on recycling rates. However, the currently available data is old (dating back to 2009), hindering the GLA's ability to fully analyse current and future trends in recycling. It is important to be able to analyse and present data in a way that supports and encourages action by boroughs.
- 1.6 The Mayor is committed to cutting unnecessary single-use plastics in the capital, and in his LES has set an ambition for London to be a zero-waste city. His aim is for no biodegradable or recyclable waste to be sent to landfill by 2026; and for 65 per cent of London's municipal waste to be recycled by 2030.
- 1.7 The project will be led and managed by ReLondon, who will seek to obtain additional in-kind and financial contributions from external partners.

## 2. Objectives and expected outcomes

### Data analysis to support best practice and review impact of RRP actions

- 2.1 This project will look to review and analyse available data to provide insights and demonstrate best practice, such as best practice for inner or outer London boroughs. Where possible, we will work with others to gather and develop innovative approaches to estimating London's waste composition and recycling. There is also an opportunity to reduce greenhouse gas (GHG) emissions from all waste-management activities.
- 2.2 We plan to deliver this work with ReLondon, who will lead the project, with input from London Councils' One World Living programme. We will also approach national government, waste authorities and the waste industry to seek input, data, and in-kind/financial support for the project.
- 2.3 The data analysis deliverables are as follows:
- updated waste model for London
  - best-practice document for boroughs to support future iterations of RRP
  - improved understanding of the likely change in recycling rates, waste reduction and associated carbon emissions from waste management over time, and the impact of these changes on the Mayor's targets
  - improved understanding of drivers of change (positive and negative)
  - improved understanding of the composition of commercial waste and recycling rate (data and co-funding dependent).
- 2.4 The costs of this project are detailed below

Activity (costs are estimates)	Cost (£)
Data collection, review and analysis	60,000
Reporting and production of best-practice engagement tools	10,000
Review of approaches to access and analyse commercial waste	30,000
<b>Total</b>	100,000 GLA contribution,

## 3. Equality comments

- 3.1 Under section 149 of the Equality Act 2010, in considering whether to grant this approval, "due regard" must be had to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people who have a protected characteristic and those who do not. Protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation (and marriage or civil partnership status for the purpose of the duty to eliminate unlawful discrimination only). This duty has been taken into account.
- 3.2 Deprivation, housing tenure and housing density are all factors in determining Londoners' access to waste services and behaviours related to recycling and waste management. The policies supported by this programme aim to provide consistent services to Londoners and to encourage them to reduce their consumption-based emissions. Doing so will give all Londoners the opportunity to contribute to reducing London's carbon emissions and to enjoy the wider benefits of environmental improvements. There are additional benefits aligned to supporting Londoners to eat sustainable, healthy and affordable diets. This decision will support two projects, as detailed below.
- 3.3 The project will constitute research and analysis. This project will not have direct impacts on waste services, Londoners or any particular group. However, we will look to consider equality, diversity and

inclusion (EDI) and social justice within the analysis, and EDI will be considered in actions undertaken as a result.

- 3.4 No other equalities issues have been identified regarding the nature of the proposals.

#### 4. Other considerations

##### Data analysis to support best practice and review impact of RRP actions

- 4.1 The risks associated with this project are provided below, alongside mitigation measures.

Risk	Measures to reduce risk
We fail to secure additional support and funding.	This project would be beneficially delivered in collaboration with others. Failure to secure additional funding will require a reduction in the scope of the project. In doing so we will focus the project on critical outputs, such as a best-practice document, to support the GLA's statutory duties such as RRP, with less focus on commercial-waste data.
Availability of new data is limited or inaccessible.	Assumptions to be used will be extrapolated from the most recently available data and industry expertise/insight. We can anonymise data to avoid the performance of particular boroughs or companies being visible, which can be a successful tactic to encourage data sharing.

##### Conflicts of Interest

- 4.2 There are no actual or perceived conflicts of interest with any person involved in drafting or clearance of this form.

##### Subsidy control

- 4.3 The Subsidy Control Act 2022 contains a four-limbed test to determine whether a contribution of grant funding amounts to a subsidy. In order to be a subsidy, the grant funding must satisfy each of the four limbs. In relation to Limb A, the funding will be provided from a public Body, the GLA.
- 4.4 As set out above, ReLondon is the operating name of the London Waste and Recycling Board, which is a statutory body created by section 356A of the Greater London Authority Act 1999). ReLondon has the statutory objectives to promote and encourage the production of less waste; an increase in recycling; and the use of more environmentally beneficial waste collection and disposal methods in Greater London. In this way, ReLondon will not be acting as a commercial enterprise, therefore the grant does not meet Limb B.
- 4.5 In relation to Limb C, due to the statutory function of ReLondon, the funding does not offer any specific advantage to the organisation over another as ReLondon is the only statutory body with these requirements, and is not acting as an enterprise for the purposes of this grant.
- 4.6 In relation to Limb D, provision of grant offers no economic advantage or financial assistance or would have an impact on competition or investment in the UK and is the least distortive means to delivering the project. The grant is enabling a statutory body to carry out activities related to its statutory functions.

#### 5. Financial comments

##### Data analysis to support best practice and review impact of RRP actions

5.1 Approval is requested for:

- Expenditure of up to £100,000 under the Waste and Circular Economy programme for 2023-24 financial year. This expenditure is to fund data analysis to support best practice, and to review the impact of Reduction and Recycling Plan actions.

5.2 A breakdown of the proposed plan of expenditure is shown in section 2.4.

5.3 This expenditure is budgeted for within the Waste and Circular budget for 2023-24 within the Environment Unit and all expenditure will be incurred in 2023-24 financial year.

## 6. Legal comments

### Power to undertake the requested decisions

6.1 The foregoing sections of this report indicate that the decisions requested of the Executive Director of Good Growth (the Director) concern the exercise of the GLA's general powers, and fall within the GLA's statutory power to do such things considered to further or that are facilitative of, or conducive or incidental to, the promotion of the improvement of the environment within Greater London. In formulating the proposals in respect of which a decision is sought, officers have complied with the GLA's related statutory duties to:

- pay due regard to the principle that there should be equality of opportunity for all people
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
- consult with appropriate bodies.

6.2 In taking the decisions requested, the Director must have due regard to the Public Sector Equality Duty – namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; advance equality of opportunity between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation) and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Director should have particular regard to section 3 (above) of this report.

### Grant funding to ReLondon

6.3 The proposed funding of up to £100,000 to ReLondon may be viewed as grant funding rather than a contract. As the officers have set out at paragraph 1.2, the project will be led by ReLondon and the benefits of the project will inure not to the GLA rather to Londoners through support of improvements to delivery of waste services and the transition of a circular economy.

6.4 The Subsidy Control Act 2022 provides a four-limbed test to assess whether the provision of financial assistance amounts to an unlawful subsidy. At paragraphs 4.3 to 4.6, above, officers have discussed how each of the limbs relates to the proposed grant to ReLondon.

## 7. Planned delivery approach and next steps

### Data analysis to support best practice and review impact of RRP actions

- 7.1 The project will be led and managed by ReLondon in order to build on existing analysis that has been undertaken by them and others. The GLA will contribute £100,000 of grant funding towards ReLondon's project costs in relation to the securing of academic and consultancy support for data review, collection and analysis; and designing appropriate analysis methodologies.
- 7.2 The timeline for this project is detailed in the table below.

Activity	Timeline
Engagement with potential co-funders and partners	September 2023
Procurement	October 2023
Delivery start date	November 2023
Delivery end date	March 2024
Project closure	March 2024

**Appendices and supporting papers:**

None

### Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

### Part 1 – Deferral

**Is the publication of Part 1 of this approval to be deferred? NO**

### Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

**Is there a part 2 form – NO**

### ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

#### Drafting officer:

Jemilah Bailey has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Assistant Director/Head of Service:

Catherine Barber has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

#### Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

#### Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 18 September 2023.

✓

### INTERIM CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

**Signature:**



**Date:**

18/09/2023