GREATER LONDON AUTHORITY

THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY

CONSULTATION REPORT

AUGUST 2011

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1. Introduction and background

This report summarises the main themes and issues raised by the public and stakeholders in response to consultation on the draft revision of the Mayor's Municipal Waste Management Strategy ("the strategy"). It also includes reference to the Mayor's response in October 2010 to the issues raised by the Greater London Assembly in respect of the draft strategy. Changes made to the strategy consequential upon these consultation exercises are described.

The Mayor's original Municipal Waste Management Strategy was published in September 2003. It contained policies and proposals to manage London's municipal waste (household waste and business waste collected by local authorities) in the period to 2020. The proposals (actions to implement the policies), however, were for implementation in the period ending in 2006 and the strategy, therefore, requires updating. The Mayor has, accordingly, embarked on a wholesale revision of the 2003 document and has produced a revised strategy with policies and proposals for implementation in the period to 2031.

The Mayor will work with London's waste authorities and other stakeholders to implement his revised strategy. London's waste authorities, however, are largely responsible for implementing the strategy, as it is they that deliver local waste services and procure the necessary waste treatment capacity. In exercising their statutory functions under Part II of the Environmental Protection Act 1990 the waste authorities are required to act in general conformity with the strategy.

This section of the report summarises the statutory framework within which the Mayor's municipal waste management powers and responsibilities are to be exercised, and the associated requirements for consultation. Section 2 describes the exercise undertaken by the Greater London Authority ('GLA') to ensure extensive and inclusive consultation during the strategy development process. Section 3 (Public Consultation) and Section 4 (Stakeholder Consultation) identify the main findings that emerged from consultation. Section 5 describes the consequential changes made following consultation, to the draft policies and proposals to produce the revised strategy for publication.

1.1 The Mayor's powers – The Greater London Authority Acts 1999 and 2007 ('GLA Act 1999 (as amended)').

The Mayor is required by the GLA Act 1999 (as amended) to prepare and publish and to keep under review a Municipal Waste Management Strategy that shall contain his proposals and policies for the recovery, treatment and disposal of municipal waste in Greater London. The strategy may also contain such other proposals and policies relating to municipal waste as he considers appropriate.[1] In revising his strategy, the Mayor is required to have regard to, among other things, the National Waste Strategy[2] and strategies developed by Greater London authorities under the Waste and Emissions Act 2003 (joint waste management strategies), and any guidance given to him by the Secretary of State concerning the implementation of these strategies.

The GLA Act 1999 (as amended) requires waste authorities to notify the Mayor of new waste contracts before they are advertised and requires waste authorities to act in general conformity

[1] Section 353: Greater London Authority Act 1999 (as amended)

[2] The National Waste Strategy sets out the Government's policy for the achievement by the UK of its commitments under the 1999 European Landfill Directive.

with the Mayor's Municipal Waste Management Strategy when undertaking their waste functions.

The Mayor has a power of direction under Section 356 of the GLA Act 1999 (as amended), which he may exercise for the purposes of implementing his Municipal Waste Management Strategy. He also has planning powers that enable him to become, subject to a policy test, the planning authority for the determination of applications for waste facilities in Greater London that would treat over 50,000 tonnes of waste per annum. A facility of this size would likely serve more than one London borough and would be of strategic importance.

In preparing and revising his strategy for the management of London's municipal waste, the Mayor must have regard to, among other things, the National Waste Strategy which sets out the government's policies for how the UK will reduce the amount of biodegradable municipal waste sent to landfill and achieve its commitments under the 1999 European Landfill Directive. In June 2011 the government carried out a full review of waste policy in England, looking at the most effective ways of reducing waste arisings and maximising cost benefits from waste reuse and recycling, and at how waste policies affect local communities and individual households. The main principles to emerge from the government's review of waste policy in England are as follows:

- To prioritise efforts to manage waste in line with the waste hierarchy and to reduce the carbon impact of waste.
- To develop a national waste prevention programme
- To promote the use of lifecycle thinking in all waste policy and waste management decisions, and the reporting of waste management in carbon terms, as an alternative to weight-based measures;
- To ensure waste authorities consult with local communities and individual households on the provision of high quality and consistent waste and recycling collection services, and encourage residents to use these services
- To draw up plans to consult on a disposal to landfill ban of specified waste materials
- To draw up plans to consult on increased recycling target rates for packaging producers from 2013-2017
- To maximise the contribution of the waste and waste recycling industries to the benefit of the UK economically and environmentally
- To consider how best the UK can work towards the achievement of a 'zero waste economy' by drastically reducing the amount of waste created and the valuable resources sent to landfill, and by focusing on the operation of the entire waste management process from source to end of life
- To consider new techniques and systems for with the management of commercial waste and the promotion of 'voluntary responsibility deals', reducing the amount of waste generated by commercial production and retail sales
- To abolish the Landfill Allowance Trading Scheme (LATS) at the end of the 2012/13 scheme year.[3]

[3] Defra considers that the rising level of Landfill Tax has been the primary driver behind waste authorities' diversion of municipal waste from landfill

The Mayor's Municipal Waste Management Strategy complements the government's approach for managing England's waste set out in its national waste management review. In particular London's municipal waste management will be able to respond in a positive way to a national policy shift towards using carbon accounting techniques alongside weight based targets, introducing a potential landfill ban on certain waste materials, increasing recycling targets for packaging materials, and generating low carbon energy from non-recycled waste as a way to make an important contribution towards meeting national CO_2 reduction targets.

1.2 Consultation Requirements

Under the GLA Act 1999 (as amended),[4] in revising the strategy, the Mayor must consult, among others:

- the London Assembly and the four functional bodies
- each London Borough Council
- the Environment Agency,
- waste disposal authorities in Greater London
- any waste disposal authority the area of which has a boundary which adjoins any part of the boundary of Greater London
- local authorities in whose areas municipal waste is disposed of by waste disposal authorities in Greater London or is proposed in the strategy to be so disposed of, and
- any other body which is concerned with the minimisation, recovery, treatment or disposal of municipal waste and which the Mayor considers it appropriate to consult.

The Mayor is required to consult the London Assembly and the functional bodies first on his draft revisions to his strategy, before going on to consult the other bodies and persons required to be consulted under the Act; and this procedure has been followed.

2 Consultation process

Consultation on the Mayor's draft revisions to his strategy had two stages. First, the Mayor consulted the London Assembly and the four functional bodies in the period January to March 2010. Following this, on 18 October 2010 a formal consultation commenced with other organisations and the public, which ended on the 14th of January 2011.

In addition to these formal consultations exercises, informal consultation was undertaken with a variety of organisations throughout the strategy development process. During the preparation of the revisions to the strategy, the GLA Waste Team opened a dialogue by email with a number of stakeholders including:

- London boroughs and waste authorities
- Defra (on behalf of central government)
- 3rd Sector Organisations (through the London Community Resource Network)
- Non-Governmental Organisations (NGOs)
- Waste companies
- Business Groups
- Regional Planning Authorities

[4] S.32, s.42, s.42A, s.353: GLA Act 1999 (as amended)

2.1 Consultation with the London Assembly and functional bodies

On 18 January 2010, consultation on the first draft of the revisions to the strategy commenced with the London Assembly and functional bodies. The deadline for responses was 15 March 2010.

Although there was no statutory obligation to consult organisations other than the Assembly and functional bodies at this stage, copies of the draft strategy were also sent to other waste stakeholders and made more widely available on the GLA website. This allowed interested organisations the opportunity to provide an input into the development of the strategy at an early stage, giving those with specific expertise in relevant policy areas an opportunity to comment on the strategy and to raise its profile. Written responses were not actively sought at this stage, other than from the London Assembly and functional bodies, although some organisations did respond in writing. While these responses could not be formally considered as part of the statutory consultation process, they were taken into account in the continuing preparation of the policies and proposals in the revised strategy.

The Assembly's response to consultation was formally presented to the Mayor in a report dated March 2011 that contained thirteen principal recommendations. The Mayor published his formal response to the Assembly's recommendations by a letter of 17th January 2011 in which he set out the consequential changes to the strategy that he was minded to make. Where he did not propose to accept recommendations he set out his reasons for not doing so. A revised draft of the strategy including these changes was published in October 2010.

2.2 Consultation with the public

Between October 2010 and January 2011 statutory consultation on the strategy took place with the public, with a deadline for receipt of written responses of 14 January 2011. The strategy was published on the GLA website www.london.gov.uk with a web based survey open for public engagement and response. Summary pages were posted for each chapter of the strategy with the opportunity given to readers to make comments. The consultation page was advertised on the front page of the GLA website for the entirety of the consultation period; and was emailed to approximately 13,000 public contacts[5] and advertised on a number of Borough web pages. The online survey received 61 public responses whilst the online 'comment for all' received 24 responses. 50 stakeholder responses were also received. The survey pages can be found at Appendix 1.

A survey of 1000 Londoners' perceptions towards waste management in London had been undertaken in October 2009, and was used to inform the preparation of the draft revised strategy. The survey was representative in terms of a range of demographics including gender, age, social class, tenure, ethnicity and geographic location, allowing comparisons to be made between issues raised by different groups. 1000 is the standard number of respondents sought in public opinion surveys to estimate a whole population's response with high confidence and to allow robust comparisons between groups. The results from the survey will be published on www.london.gov.uk shortly after the publication of the strategy.

2.3 Consultation with stakeholders

As mentioned in Section 2.1, between October 2010 and January 2011 the Mayor engaged in an informal dialogue with waste stakeholders inviting and receiving feedback on the policies and

[5] These are members of the public that have given the GLA their contact details, or have attended events in the past and left details, wanting to be kept up to date with what the Mayor is doing.

proposals in his draft revised strategy. During the public consultation period the GLA also held workshops with waste stakeholders to get their views on the draft strategy, and also organised stakeholder meetings to discuss the draft strategy. Workshops or meetings on the draft strategy were held with:

- The Association of London Cleansing Officers (ALCO) – 2 meetings
- London Recycling Officer Group (LROG) meeting
- London Councils Transport and Environment Committee meeting
- London Councils Officer Advisory Group on Waste meeting
- All inclusive stakeholder workshop hosted by the GLA

48 stakeholder consultation responses on the Mayor's draft municipal waste management strategy were received. The breakdown of stakeholder responses was as follows:

- Government organisations: 8
- London Waste Authorities (including waste disposal authorities): 17
- Waste Industry: 6
- Consultancies: 5
- Other (including third sector, and non-waste industry companies): 12

The responses from the public and stakeholder consultation exercises have been taken into account in the preparation and development of the policies and proposals contained in the strategy for publication. Sections 3 and 4 of this report summarise the main findings from these consultation exercises, and Section 5 describes the consequential changes that were made to the policies and proposals in the strategy. The stakeholder consultation responses can be found in Appendix 2.

2.4 Integrated Impact Assessment

The development of the strategy was subject to an Integrated Impact Assessment (IIA). The assessment met the legal requirements to undertake a strategic environmental assessment (including sustainability appraisal). It also assessed the likely health, equalities, and community safety effects of the strategy. A report on the IIA was published on the GLA website in October 2010 with the draft strategy for public consultation.

3 Findings from the public consultation

The views of those who responded to consultation are summarised in this Section under italicised headings which comprise the questions asked in the consultation documentation.

'What do you think of the Mayor's vision?'

Consultation responses show that, in general, the reception given to the Mayor's vision for municipal waste management in London has been positive with the public's responses showing agreement with the overarching policy of managing London's waste more efficiently. This outcome is reflective of survey findings where more than 9 in 10 Londoners said that recycling was either very (72 per cent) or fairly (21 per cent) important to them.

There were a number of respondees, however, who contended that the Mayor's waste management policy could be even more ambitious, and some that stated that, although they agreed with it, they remained sceptical as to its efficacy, suggesting that proof of its success would only be discoverable with implementation.

There was a view expressed among some respondents that London is currently lagging behind other international cities in municipal waste management and needs to learn from these and catch up.

The most common problematic issue cited in delivering the Mayor's policy vision was the consumer's difficulty in dealing with over-packaged and poorly made/cheap products. The view was expressed that it is manufacturers and producers that need to address that issue in order to facilitate the change away from disposal of waste to landfill to re-use and recycling and the reduction of waste at source. There was also recognition, however, that some food packaging is required by health standards. In addition the view was expressed that there needs to be a culture change in consumerism to encourage people to buy better quality products that will last and to move away from purchasing disposable items such as 'throwaway fashion'.

'What do you think should be the top priorities for the Mayor to deliver this vision?'

The London public's overall response seemed to reflect more or less closely the priorities outlined in the Mayor's strategy. The most popular issues or proposals raised included:

- reducing the amount of waste we produce, particularly through working with producers to reduce packaging where appropriate, and educating the public about how they can go about consuming less packaging
- working to change the culture of consumerism to reduce the amount waste produced; this included working both with the public to help them understand the impact their behaviour can have as regards waste production and also working with producers to reduce the number of low quality products on the market that have a limited usable life.
- ensuring there is a comprehensive reuse network created that will take all kinds of items that are potentially reusable; and that can cater to the practical needs of users.
- encouraging Boroughs to deliver a consistent recycling service across London.
- improving available information regarding what waste can be recycled and the impact that it has on waste management.
- using non-recyclable waste to generate energy.

Reduction and reuse:

'What do you think about the targets? Targets too high/low/about alright?'

The overwhelming response to the Mayor's targets was that they were not set high enough or to be delivered fast enough. Comparisons were made with other countries, with the feeling expressed that, at the Mayor's rate of change, London will remain "challenging for the dirty man of Europe title".

The provision of educational information as to how to reduce personal waste was cited as important if targets were to be met. Incentives/fines for Londoners that don't recycle waste where it is possible for them to do so were mentioned in responses as a way to encourage the engagement in sustainable waste management by those that do not have a natural concern for the avoidance of creating unnecessary waste.

'How would you go about starting to reduce your waste? What would make it easier for you?'

Around seven in 10 Londoners surveyed said that they already tried to reduce their waste by buying products with less packaging or by purchasing refillable items. It is clear from the responses that many Londoners are already trying to take action to reduce their waste.

A substantial number of consultation responses dealing with these questions concerned recycling or reusing waste as opposed to reducing waste which suggests that Londoners either haven't made this distinction yet, or are not very focussed on reducing the amount of waste they produce. The indications are that there is a level of communication and information giving required to encourage waste reduction.

The key waste management areas mentioned in responses included:

- Packaging: retailers were felt to be the culprits here with Londoners indicating that they need to be encouraged to reduce packaging on their goods. It was suggested that junk mail should be illegal and over-packaging on mail order products should be eliminated.
- The quality of goods: the poor quality clothes in particular as they don't last and therefore soon become waste.
- Plastic bags: a problem that could be easily eradicated by banning them.
- Deposit schemes; a way to stop waste such as glass bottles entering the waste stream

A notable absence in the responses to consultation was mention of the individual's own consumer habits as a source of waste. The responsibility for the production of unnecessary waste was very much put on the shoulders of the producers of goods and retailers in responses and how they go about their business. This suggests that the public, in general, are not in mind to address their own waste management but look to changes in the supply of their consumables as the principal means of waste reduction.

'What do you currently throw away that you think you might reuse or repair?'

A small number of responses to this question mentioned the use of reuse networks such as freecycle or charity shops. There was felt to be a gap, however, in the network for goods (including, for example, broken electrical items) that might be capable of reuse but probably would not be taken by these outlets. No solution to fill this gap was identified.

Electrical goods were the items respondees said they most threw away that otherwise might be reused or repaired. A number of responses indicated that this was because of a lack of information about where they might take such items for repair.

Clothing was a popular item mentioned in responses for reuse, although there was some concern about whether there was anything that could be done about clothes that were not suitable for wearing anymore – was there an alternative to throwing them out?

As mentioned in Section 2, developing a deposit scheme for everyday items that can be reused, such as glass bottles, was put forward as a waste saving option.

Access to reuse networks was cited as problematic for those who do not have access to a car or other means of transport to covey their unwanted goods to reuse collection sites.

'How do you feel about the packaging on the products you buy?'

In general, respondees considered that the goods they bought were over-packaged. These included both goods that were bought in supermarkets and those that were mailed or delivered with substantial padding. In addition, there was concern over the level of packaging that was not recyclable and, in most cases, this was considered unacceptable as there should generally be a recyclable substitute available.

The responses indicated that the public consider that retailers, in particular supermarkets, should have to provide recycling facilities after checkout so that shoppers don't have to take packaging home with them and deal with it there. The burden of management of these forms of waste should be placed on those responsible for the packaging and not on the consumer.

A number of respondees said that packaging influenced their shopping habits in so far as they were encouraged to shop at places where they knew there was comparatively less packaging of consumer goods.

There was some recognition that, in the case of edible or perishable goods, at point of sale there is an essential need for packaging, for example, to prevent damage or contamination and to retain freshness etc. It was said that this necessary packaging should be recyclable.

'What would make you use a reuse network? What is your perfect reuse network?

The 2009 survey revealed that Londoners are keen to reuse their old belongings – 94 per cent of those surveyed said that they would use a reuse network; 89 per cent said that they preferred to know that their old belongings were being reused rather than thrown away; and 83 per cent said that they tried to make sure their old belongings were reused.

Londoners are most concerned about the cost of a reuse network – 43 per cent of Londoners said this would be the first question they asked; 20 per cent were most interested in whether the reuse organisation would be reliable; and 12 per cent were most concerned about where the items donated would end up.

The responses to consultation indicated that many Londoners already use reuse networks such as Freecycle or charity shops, both for passing their unwanted items on, and for finding second hand goods that they themselves wanted.

There were a number of factors Londoners thought would go to making an efficient and effective reuse network, including:

- Good access – transport was considered to be a potential difficulty where transporting large items from place of origin to the reuse facility was required. An accredited pick-up service, it was suggested, would make it easy for people to donate items. One respondent suggested that free pick-up should be provided for disabled or elderly people entitled to the freedom pass/taxi card schemes.
- Provision of storage for unwanted reusable items so that householders are not required to store them in their homes or minded to throw them away for lack of storage space.
- Linkage with charity shops so that unwanted reusable items are accepted quickly.
- Good publicity/marketing so that Londoners know where to look for these networks and to make sure they are well used both on the demand and supply sides.
- Reuse websites need to be simple and easy to operate.

'Do you think the policy actions will be successful?'

The responses to consultation indicate that Londoners, in general, think that the revised policies and proposals will be successful in reducing the amount of waste London produces. There were concerns, however, regarding the level of political commitment to and will supporting, the strategy. It was also felt that there was potential to move away from just 'encouraging' Boroughs to take action to making actions supporting the strategy compulsory.

A number of respondents to consultation said, with regard to the need to reduce packaging, that there should be a regulatory requirement placed on manufacturers and retailers to reduce it as far as reasonably practicable; it was recognised that it is difficult for the consumer of goods and services to change his or her waste generating habits if there is no alternative supply.

Some concern was also expressed regarding the development of a second hand market that might reduce demand for new goods and thereby impact adversely on the London economy.

Is there anything else the Mayor should be doing to encourage reuse and reduction?

Respondents to consultation suggested the following actions:

- Regulations on packaging – a 'tax' on packaging;
- Deposit schemes;
- Waste targets and associated penalties for businesses;
- Incentives for refills that save waste – for example, ensuring it's cheaper than buying a new equivalent;
- More pick-up facilities for compost and organic waste;
- Recycling bins in central London;
- More information on where to get electrical goods repaired;
- Training and job-creation in repair and refurbishment of unwanted items;
- Further exploration of incentive schemes: for example, rewarding homes and businesses for reducing the amount of waste they create.

Recycling:

'Do you think it is important to recycle? Are the targets too high/low/about right?'

Generally those responding to the consultation thought that the Mayor's targets were not optimistic enough. Respondents indicated that they were able to recycle a high proportion of their waste and that others should also be able to do so; and this should be encouraged through setting higher recycling targets. Foreign examples of higher recycling rates were cited suggesting that London lags behind experience elsewhere.

There were concerns in responses regarding the waste management infrastructure / service provision available to Londoners being inadequate to deliver the planned levels of recycling; that, in turn, could mean that additional time is necessary in order to deliver any significant changes in recycling or reuse of waste.

There was also some concern expressed in connection with the disposal of organic waste, in that it is smelly and can attract rodents and insects and, as such, prove unhygienic. Respondents indicated that retaining this waste within their homes for a week or more was a difficulty and asked for an alternative solution to be found.

'What stops you from recycling?'

Recycling provision for Londoners is generally by doorstep collection. More than 8 in 10 respondees said they had doorstep collections for common recyclables including paper, cans, glass and card; Only about six in 10, however, said that they had doorstep collections for garden waste and cartons or tetra pack.

The 2009 survey showed that respondents mostly thought that improving their recycling service would improve their recycling rates. 6 in 10 said this would be achieved by provision for a wider range of recyclables, and around half, by clearer information being made available about what items could be recycled and where.

Recycling provision:

The following is a summary of the obstacles respondents to consultation said they faced to recycling more of their waste:

- The absence of a doorstep collection service for certain materials was a persistent problem identified –it is difficult to take this waste (such as batteries, garden waste, fluorescent bulbs and electrical goods) to a place for specialist recycling particularly if the individual does not own a car,
- No recycling bins on the streets in the public realm for people to recycle waste when they're out and about.
- No food waste collections provided for blocks of flats so this waste goes in the standard bin for landfill.
- The difficulty of providing recycling bins, particularly in flats, is an obstacle to improving recycling due to lack of space and practical issues such as the maintenance of hygiene. Some respondents considered that the storage of a number of bins in their gardens was unattractive.
- Lack of provision for the recycling of mixed plastic packaging – if mixed plastics can't be recycled together then there should be legislation making all plastics compatible for recycling together.
- Inconsistency across Boroughs in terms of what waste they do and don't recycle.

Information

Responses still show some level of confusion about what waste can be recycled and what can't. There was some concern that the information that is made available can be confusing and at times inconsistent. There is particular confusion concerning the recycling of plastics. This confusion is borne out by the 2009 survey work which showed a significant number of respondents thought that polystyrene and cellophane could be recycled.

In this connection, the following other matters of concern were identified in responses:

- Clearer marking on packaging was requested to ensure consumers were properly informed about how to recycle it.
- Rumours that all the recycled materials collected were in fact dumped; and that the recycling process is polluting
- Operatives staffing the municipal waste facilities were using electrical goods for their own means/profit rather than passing them on

'What is most likely to make you recycle more?'

Sensibly, respondents suggested mainly solutions to the issues they had raised under the previous question as those that would make them recycle more of their waste.

Those proposed included:

Provision

- Accepting more items for recycling – including doorstep collections for batteries, electrical goods, engine oil and fluorescent light bulbs. Or more varied bring-to sites nearby.
- Making recycling as easy as possible so it does not become not a time consuming chore.
- Not having to separate items for recycling.
- Knowing that wherever one lives in London the waste management process will be the same for recycling.
- Weekly collections of compostables.
- More frequent recycling collections.
- Scheduled pick-up dates for items that aren't regularly recycled such as batteries, clothes, shoes and garden waste.
- Development of the network of stores that take items back that would otherwise be difficult to recycle, such as batteries.

Information

The following information was requested to be provided

- Knowing exactly what can be recycled – the need illustrated by the confusion surrounding the ability or not of different types of plastics to be recycled.
- Easy, reliable and clear instructions on what to do.
- Demonstrable proof that things that Londoners are putting out to be recycled are actually being recycled
- Better communications from Boroughs about waste collections and an easy to use Council webpage where you can select the type of bins you want for your property.

Incentives were mentioned in responses, with the emphasis on them being positive rather than negative; for example, The Green Rewards scheme.

Packaging materials were considered a waste issue of concern: – more items should be made from recyclable materials – regulation was suggested to enforce this requirement upon producers.

Technology: development to ensure that the spectrum of materials that can be recycled is broadened.

'Do you think the policies will work to incentivise recycling in London?'

Respondents to consultation were, in general, positive towards the policies and proposals in the strategy. There was particular support for providing more on-street recycling bins, but with the proviso that they are well-marked so that users know what they are supposed to use them for. There was also the view expressed that, as these bins are so rare at present, they are not part of the general public's understanding of the availability of recycling opportunities in Greater London. With more provided they would become more influential in persuading Londoners to

recycle on the go. The 2009 survey work confirmed this likelihood with 80 per cent of those surveyed saying they would use on-street recycling bins if they were made available. There was also concern, however, that there might be cost issues with providing wide-scale on-street recycle bins.

The suggestion of a deposit scheme to encourage people to recycle by receiving money back on return of the item was well received and seen as encouraging good waste management.

The making available of further education / information on the costs of non-recycling was also indicated as a policy the Mayor should adopt and actively pursue.

'What do you think should be the priority for the Mayor, and is there anything he's missing to improve recycling?'

There were a number of differing views expressed concerning what the Mayor should prioritise to improve recycling rates, as summarised below.

Communications:

- Education – recycling needs to become a mainstream day-to-day activity – not something seen as an alternative 'saving the world' issue;
- Individuals will only recycle if it is in their interest – show them that it is cheaper, and make it at least as important an issue as traditional disposal;
- Make sure Londoners have the information they need to recycle effectively;
- Work with and engage those communities where recycling rates are low to understand better the reasons for this and to address them effectively.

Provision:

- Introduce deposit schemes to encourage recycling.
- Offer recycling for all plastics.
- Make it compulsory for Boroughs to collect food waste.

Lobbying:

- Persuade supermarkets to give out compostable bags instead of the current plastic bags.
- Lobby for legislation to compel manufacturers to ensure that all their packaging and products can be recycled.

Infrastructure

Support for the development of waste management infrastructure in Greater London.

'To what extent do you agree or disagree that we should be developing more of these waste treatment sites in London?'

The 2009 survey of Londoners showed strong support for developing infrastructure within London to treat residual municipal waste to generate energy (once other reducing, reusing and recycling options had been exhausted) as opposed to it being land-filled. 67 per cent of those surveyed strongly agreed that waste to energy sites should be developed; 20 per cent agreed, with only 5 per cent disagreeing.

The majority of respondents to the consultation were in favour of treating more of London's municipal waste within London, and the development of waste treatment plants in London. A number thought that, as Londoners produce waste, they should shoulder the responsibility of

managing and disposing of that waste. Cautionary notes nevertheless accompanied these observations, as follows:

- Fear that the Thames Gateway could be required to accommodate a disproportionate amount of this waste management infrastructure;
- Sensible policy as long as costs are lower than those incurred in sending waste for treatment / disposal outside of London
- Unattractive sites that already exist in London should be utilised for the siting of waste management infrastructure. Suggestions included old gas works and contaminated sites where it is too expensive to build for residential or office purposes.
- Could these plants be sited along the river so waste can be transported by barge? There exists already much light industrial infrastructure in these areas such that the negative aesthetics of waste development are less likely to be in issue.

There was some confusion among respondents in answering this question in that some thought the Mayor might be suggesting that London should not reduce, reuse and recycle as much municipal waste as possible before taking steps to treat waste to produce energy. This confusion generated strong opposition, demonstrating the importance of explaining the measures that are being taken to minimise London's waste that has to be treated this way; and that it is Mayoral policy that waste to energy is the final resort when other options for the management of the waste have been exhausted.

'What do you see as the pros and cons?'

Respondents were generally quite positive in favour of the Mayor's strategy when answering this question about the pros and cons of developing waste management infrastructure. Negative responses concerned mainly sites that might affect adversely the amenities of local communities by the production of:

- Unsightliness/dirt
- Smell
- Noise
- Associated falls in house prices in the local area

However, most respondents, when addressing these issues, felt that, if the strategy were pursued, the positives would outweigh the negatives and the real issue concerned how proposals were managed and delivered. A key factor in successful implementation of the strategy was considered to be demonstrating to local people that there were advantages for them specifically, for example, the creation of local jobs. Furthermore, it was suggested that power should be supplied to local people from these plants. Sites that were already unattractive for other forms of development were favoured and support was also given to the creation of community energy generating plants that were small enough not to be an eyesore, but could provide energy direct to the local community.

Londoners responding to consultation accepted in general, that the waste created in Greater London was the capital's own responsibility and should not, necessarily, be shipped for treatment and disposal outside the city. One respondent observed that it may be beneficial for Londoners to see first hand the municipal waste generated in London being managed on their doorstep so as to enable them to understand the scale and nature of the waste management issues and to take more responsibility for reducing their own waste.

Clean and tidy streets

'Thinking about your local area, to what extent do you agree or disagree that the streets and public spaces are clean and litter free?
Do you think the Mayor's actions to keep streets clean and tidy will achieve his vision? What do you think should be his key considerations?
What do you think should be the priorities for keeping London's streets clean and tidy?'

The following summarised responses were received to these questions.

- Better enforcement against littering, including fines, particularly for those not clearing up their dog's mess.
- A centralised system for reporting problems such as www.fixmystreet.com
- Where there is confusion over whose responsibility it is to deal with waste, a procedure providing for a quick resolution (for example private business or TfL v Boroughs) was required.
- More bins should be provided for litter, particularly in strategic places; for example, transport hubs including bus stops, train and tube stations or where there are large gatherings of people such as markets or outside nightclubs and fast food outlets.
- More bins with cigarette stubbers attached.
- Better street cleaning by local authorities in London including employing more people/machines for the purpose – setting a good example also reduces littering as people take pride in their clean neighbourhoods. Dirty streets encourage people to throw their litter on the ground.
- Education of and marketing to, the public to improve their behaviour towards the disposal of municipal waste; this should start early at schools.
- Pressure on manufacturers and retailers to reduce the packaging that can become litter, or to engage more in the use of biodegradable and recyclable materials.
- A greater responsibility on business to clear up outside their premises.

There wasn't a great deal of discussion about plastic carrier bags but there were comments both for them (as they're stronger than biodegradable bags) and against them (as litter and unrecyclable).

4 Findings from the stakeholder consultation

On the whole the draft strategy was generally supported, particularly the Mayor's focus on waste reduction and reuse, increasing London's recycling performance (particularly in flats), mitigating climate change, the need to develop more waste infrastructure in London, and working with boroughs to improve street scene. Key areas of concern or requiring more development included:

- the challenges London faces for achieving the Mayor's reduction, reuse and recycling targets given its diverse and transient population, high proportion of high density housing, and proportionally less garden waste than other UK regions.
- a greater understanding of the Mayor's Emissions Performance Standard (EPS), what the implications are for waste authorities to achieve it, and clarity on how it will be enforced and monitored
- the ability for local authorities to provide effective waste services due to cuts following the Government's Corporate Spending Review
- certainty of the London Waste and Recycling Board's (LWARB) funding for new waste infrastructure and improving access for boroughs to get funding from it, particularly for collection infrastructure
- litter programmes need to have strong education and enforcement elements.

With regard to the EPS, stakeholders wanted a review of the methodology used to develop the EPS, and to better understand the costs associated with meeting it. The GLA undertook two pieces of consultancy work in response to these concerns:

1.) *Independent review of the methodological approach used for developing the EPS.* The review concluded the methodological approach undertaken to be consistent with similar lifecycle techniques and presented recommendations that have been incorporated into the development of the EPS for the strategy. Details concerning the EPS and its justification are to be found in Policy 2, Appendix 4c and Appendix 4d of the strategy.

2.) *Assessment of the financial and technical implications for meeting the EPS.* This work modelled the affordability of a range of different waste management scenarios that could be used to achieve the EPS. The report concluded 658 of the 1000 waste scenarios modelled would meet the EPS across a range of recycling performance and waste management technologies. The GLA sought waste data from a selection of London waste authorities and consulted on a draft progress report with a Steering Group comprising representatives from London's waste authorities, London Councils, the Environmental Services Association, Defra, and LWARB. Feedback on the draft report was incorporated into the final report, attached as Appendix 4b to the strategy.

The GLA also developed a simple online ready reckoner tool for waste authorities to determine the performance of their waste management activities against the EPS. The GLA tested the usability of the tool with the Steering Group as part of the consultancy work on the EPS (2. above), and incorporated suggested improvements into the specification of the final tool. The tool and a user manual can be found at www.london.gov.uk.

On the 8th of July 2011 (shortly before the strategy was published) the GLA presented the key findings from the two consultancy projects set out above and the ready reckoner tool at a workshop with stakeholders that had responded to the public consultation strategy draft. The workshop included how stakeholder feedback had been incorporated into the consultancy work and the impact this had had on developing the Mayor's Municipal Waste Strategy for publication.

The GLA informed stakeholders at this workshop that the EPS would not be made a mandatory standard placed on waste authorities to achieve in the MWMS, but instead a benchmarking metric for London's municipal waste management to work towards achieving. The GLA confirmed at this workshop, however, that the minimum CO_2 equivalent emissions performance for energy generated from municipal waste (known as the carbon intensity floor) set within the EPS would be a mandatory standard for waste authorities to achieve. Waste authorities when developing municipal waste contracts and strategies would need to demonstrate how their preferred waste management solutions meet the carbon intensity floor, or show what steps were in place to meet it over the lifetime of a municipal waste management contract. The MWMS would provide that the Mayor will consider the impacts these plans may have on meeting the carbon intensity floor for the purposes of implementing his strategy when determining waste authority waste contracts and waste strategies,

The decision on the approach that the Mayor proposes to take in his strategy to implement his EPS and carbon intensity floor metrics is a result of his consideration of the feedback received from consultation, the two pieces of work supporting the EPS evidence base, and the need to ensure London's municipal waste management, makes an important contribution to achieving the Mayor's target for London to reduce its CO_2 emissions by 60 per cent below 1990 levels by 2025.

Table 1 summarises out the main themes of the stakeholder consultation responses received. Table 2 sets out the actions the Mayor has taken in revising his draft MWMS as a result of public and stakeholder consultation and as a result of the two pieces of consultancy work set out earlier in this Section.

Table 1: Consultation responses – main themes

0. GENERAL
0a - Generally supportive of the Mayor's vision and non-prescriptive approach
0b - Concern about the impact of the Comprehensive Spending Review may have on ability of waste authorities to provide cost effective waste services
0c - Mayor's waste hierarchy should replicate EU waste hierarchy
0d - More information needed on how the strategy will be monitored and enforced

POLICY 1
1a - Supports focus on reduction and reuse - more detail needed on how targets will be met
1b - Needs a greater focus on food waste prevention
1c – More detail on working with SMEs/promoting producer responsibility
1d - Supports London Reuse Network - should link with local reuse initiatives
1e - Reuse sector/initiatives needs to deliver high quality materials

POLICY 2
2a - Supports focus on climate change mitigation, not weight based targets
2b - More detail needed on how the EPS works and will be enforced
2c - More evidence needed to support the EPS approach, including costs
2d - EPS should be advisory not mandatory

POLICY 3
3a - Supports focus on maximising economic value of waste
3b - Procurement/contract issues not in the Mayor's remit
3c - Supports contract framework if it benefits waste authorities and they are involved in the development process
3d - Supports waste authorities working together on waste procurements on a voluntary basis

POLICY 4
4a - Recycling targets too ambitious for London circumstances
4b - Supports incentive schemes - need to reward reduction and reuse also
4c - Supports focus on improving recycling performance in flats
4d - Supports on the go recycling initiatives and material deposit schemes

POLICY 5
5a - Supports developing more waste infrastructure in London
5b - Proximity principle should be considered ahead of regional self-sufficiency - problems with identifying suitable sites in London
5c - More detail/certainty on funding allocations to deliver infrastructure
5d - LWARB should provide funding for waste collection infrastructure
5e - Supports greater use of river and rail transport of waste

POLICY 6
6a - Supports London-wide litter programme delivered with boroughs
6b - Litter programmes need strong education and enforcement elements
6c - Supports online litter/fly-tipping reporting tool
6d - Clarification needed where litter programme funding will come from

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SECTION 5: SUMMARY OF INCOPORATING CONSULTATION RESPONSES INTO THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY

POLICY	ACTIONS
Policy 1: Informing producers and consumers of the value of reduce, reuse, recycle	• Additional detail on Recycle for London (RFL) delivery programme contributing to reduction target • Greater focus on home composting • Stress on Mayor's public profile to influence behaviour change • Reuse targets revised, stronger links made to borough engagement on London Reuse Network with LCRN
Policy 2: Setting the Emissions Performance Standard (EPS)	• The GLA has undertaken two pieces of consultancy work to support a better understanding of and rationale for the EPS. The main findings, set out in Chapter 3 and Policy 2 of the MWMS, have been incorporated into Policy 2. These two pieces of work, attached as appendices 4b and 4d respectively to the MWMS, are: 1) An assessment of the financial and technical implications for meeting EPS 2) A review of the methodology used to develop the EPS • Confirmation that the EPS is an advisory "benchmark" carbon metric for London's municipal waste management to work towards to reduce its climate change impact. The carbon intensity floor set for energy generated from municipal waste is mandatory for waste authorities to achieve. • The GLA will monitor and report London's performance against the EPS annually. Additional information on how the Mayor will implement his carbon intensity floor is set out in Section 4 of this report and in Policy 2 of the MWMS. • Greater clarity on the relationship between meeting the EPS and achieving the Mayor's recycling or composting targets is set out in Policy 2. Where there is tension between achieving the EPS and achieving the recycling or composting targets, the Mayor will give preference to achieving the EPS. • Development of an online ready reckoner tool and user manual for waste authorities to determine the performance of waste activities against the EPS
Policy 3: Capturing the economic opportunities	• Assurance that boroughs will be involved in LWARB's four year waste management efficiencies programme. This includes the development of a municipal waste management contract framework, shared waste management services arrangements, and the development of best practice waste management reporting tools. Additional information on these initiatives is set out in Policy 3.
Policy 4: Achieving 60 per cent recycling/composting performance by 2031	• Confirmation the targets are for London and not for London waste authorities to achieve. • Confirmation that incentive schemes will focus on reduction, reuse and recycling • RFL programme to include campaigns targeted at SMEs to recycle – this will be reflected in the Mayor's Business Waste Strategy
Policy 5: Catalysing waste infrastructure	• Clarity on how LWARB will provide/create investment in waste infrastructure, for example by leveraging EU match funding into LWARB's fund. • Requiring LWARB to report annually on progress against achieving MWMS targets and objectives. • Proximity principle supported over regional self sufficiency where appropriate
Policy 6: Achieving a high level of street cleanliness	• Proposal to work with LEDNET borough group work on street cleansing • LEQ programme links with DEFRA Chewing Gum Group

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APPENDIX 1: ONLINE SURVEY ON THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY

London's wasted resource - public consultation

The Mayor would like to hear your views on his plans for London's municipal waste. Please take a few minutes to read through the information below, find out more about our policies and have your say.

The Mayor's vision is for London to become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value.

The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

What do you think of the Mayor's vision?

What do you think should be the top priorities for the Mayor in order to realise this vision?

We've summarised what we think are the key areas of interest to Londoners in this strategy. Tick the boxes below that relate to the issues you would like more information and to answer questions on and further information will appear. If you run out of time and want to come back to this survey just click submit and then start again from where you left off next time.

- ☐ Reduction and reuse
- ☐ Recycling
- ☐ Delivering London's waste infrastructure
- ☐ Keeping our streets clean and tidy

Reduction and reuse

Reducing the amount of rubbish we produce is the most effective way to save money and avoid the impact rubbish has on our environment. This isn't quite as simple as just putting less rubbish in the bin; this is about changing our consumption habits so that we make less waste in the first place.

As consumers there are a number of simple things we can do to reduce the amount of rubbish we produce; we can:

- Buy products with less packaging. This would also help boost demand for less packaged goods.

- Give your unwanted belongings like used furniture and clothing to a charity shop or reuse network like freecycle, or sell them rather than throwing them away.

- Get broken things fixed rather than putting them in the bin. This could also save you money on buying new items.

- Go second-hand - if you need to buy something try looking for a second hand one instead - this will probably save you money too.

Responsibility also lies with manufacturers - they should be making an effort to reduce the amount of packaging used so that consumers aren't burdened with creating waste unnecessarily. This might mean eliminating excess packaging or designing innovative solutions to minimise packaging.

The Mayor wants London to:

- Reduce household waste by 10% per household from 2009 levels by 2020, and increase this to 20 per cent by 2031.

- Increase the amount of municipal waste reused or repaired from 6,000 tonnes each year today to 40,000 tonnes a year in 2015 and to 120,000 tonnes a year in 2031.

What do you think about these targets? Are they

- ○ About right
- ○ Too low
- ○ Too high

Why is this?

How would you go about starting to reduce your waste? What would make it easier for you?

What do you currently throw away that you think maybe could be repaired, given to a charity shop, reused or sold?

To what extent do you agree or disagree with the following statements?

	Stongly agree	Tend to agree	Neither agree no disagree	Tend to disagree	Strongly disagree
I prefer to know something is being used again rather than thrown away	○	○	○	○	○
When I buy something new, for example a new sofa, I try to make sure the old one is reused and not thrown away	○	○	○	○	○
If there was a service that would pick up things that I no longer needed but that would be used by others, I would use it	○	○	○	○	○
I try to reduce waste by purhasing products with less packaging	○	○	○	○	○
I try to reduce waste by purchasing reusable or refillable items	○	○	○	○	○
I plan my meals and use up leftovers to reduce my food waste	○	○	○	○	○

Our survey told us that:

- Almost 8 in 10 people prefer to know that something is being used again rather than thrown away
- Around 9 in 10 already try to make sure that their old belongings are reused
- 94% of Londoners agree that they would use a reuse service that picked up their unwanted items
- Over 7 in 10 Londoners agree that they try to reduce their waste by buying products with less packaging
- Over 7 in 10 Londoners already agree that they purchase reusable or refillable items
- Almost three quarters of Londoners say that they plan their meals and use up their leftovers

How do you feel about the packaging on products you buy?

What things would make you use a reuse network in London? Do you already, what works about it and what doesn't - in your mind what would make a 'perfect' reuse network?

The Mayor's reduction and reuse policy

There are a number of ways in which the Mayor proposes to help Londoners reduce their rubbish and reuse more of it :

Funding the Recycle for London programme, which will

- Work with local authorities to promote the benefits of reducing waste to Londoners and share ideas about how to reduce waste including by making better informed purchasing decisions.

- Work with partners to develop a London-wide reuse network. This will help develop local reuse initiatives such as furniture reuse and repair schemes that can link with existing local authority waste collection services and allow people to easily donate and access second hand items.

- Promote reuse, this will mean encouraging people and businesses to donate unwanted items to a reuse network, and persuading consumers to buy more second hand items.

- Working with manufacturers to encourage them to find design solutions to their packaging that require less material so that it's easier for Londoners to make better choices.

- Promote the government's zero waste places programme and encourage Boroughs to take part. Some London boroughs are already taking part, working to identify the barriers and solutions to reducing their waste to zero.

Do you think these actions will be successful in helping London reduce the amount of waste it creates?

Is there anything else that you think the Mayor should be doing to try to encourage Londoners to reduce and reuse their waste more?

Recycling

About 70% of London's municipal waste can be recycled or composted, yet only around 25% of this actually is today. The Mayor wants to help Londoners to improve on this to realise both the economic and environmental benefits. To help achieve this he has set some targets for Londoners.

The Mayor wants Londoners to:

- recycle or compost 45% of their waste by 2015

- recycle or compost 50% of their waste by 2020

- recycle or compost 60% of their waste by 2031

What do you think about these targets? Do you think they are...

- ○ About right
- ○ Too high
- ○ Not high enough

Why do you think this?

We asked 1000 Londoners about their experiences of recycling at home, we've included some of these questions throughout this survey, so take a couple of minutes to answer them and see how your answers compare with other Londoners.

To what extent do you think it is important to recycle your household waste?

- ○ Very important
- ○ Quite important
- ○ Neither important nor unimportant
- ○ Not very important
- ○ Not important at all

Over 90% of Londoners we surveyed think that recycling is important - 72% very important, 21% quite important. So if people generally think it's important why doesn't everyone recycle? Is it because it isn't easy?

Which of the following describes best what you have to do with your recycling?

- ○ Leave it on the doorstep after having sorted it into separate containers
- ○ Leave it on the doorstep without having to separate it
- ○ Take it to nearby recycling facilities
- ○ Take it to recycling facilities some distance away
- ○ Don't know

Almost 9 in 10 of the Londoners we surveyed said that they got their recycling picked up from their doorstep, suggesting it is usually quite easy. However, about three quarters of these have to separate it into containers which might put people off, or confuse them if they don't have the right information. 14% also said that they have to take their recycling somewhere else, which could be a problem, particularly for those that don't have cars.

We also asked people how they had to recycle different types of recyclable rubbish. It turns out that there are some differences here:

- Between 7 and 8 in 10 say that they can recycle 'common' recyclables on their doorstep, such as paper, cardboard and glass

- Around 6 in 10 can recycle things like cartons, garden waste and food waste

- Around 3 in 10 can recycle clothing, furniture and batteries

So we know that most people get a doorstep service for their common recyclables. However, our figures suggest that people aren't always using these services.

What stops you from recycling?

What is most likely to make you recycle more?

The Mayor's recycling policy

There are a number of ways in which the Mayor proposes to help Londoners recycle more of their rubbish:

The Mayor will work to support the Recycle for London programme, this will include:

- Working with local authorities to promote the benefits of recycling to Londoners and sharing ideas about how to reduce waste including by making better informed purchasing decisions.

- Providing communications support to Boroughs to improve recycling.

Work with London's waste authorities to:

- Develop and provide innovative incentive schemes for Londoners to recycle and compost such as Recycle Bank and Green Rewards which allows you to build up points to get money off in local shops or to give money to charity.

- Provide more "on the go" recycling bins in strategic locations such as by bus stops and train stations and in town centres across London. Some "on the go" bins are already available, most commonly for paper, but there is a great deal of potential for more.

Work with the London Waste and Recycling Board to:

- Showcase and promote good practice examples of accessible and cost effective collection recycling services.

- Provide up to £5million of investment to develop better recycling infrastructure in flats, particularly social housing.

This might include changing rubbish chute design, funding recycling boxes and bags, putting recycling points near entrances or even providing places for composting in communal garden areas.

Work with the private sector to:

- Investigate the opportunity of implementing a London-wide deposit system for cans and bottles

Do you think that this work will help to improve recycling rates in London?

What do you think should be the priority for the Mayor, and is there anything missing that you think he should be doing to improve recycling?

Delivering London's waste infrastructure

The Mayor sees waste not as a problem to dispose of but as an economic opportunity. Managing our waste well has a number of benefits - it reduces environmental impact, it helps us keep our streets and parks clean and tidy but it can also have a monetary value too.

There are two ways the Mayor wants to reduce costs and increase revenue from waste that we would like your views on:

- Reducing the amount of waste we produce and therefore the cost of management, reusing, and recycling everything
  we can. We've already covered these in this survey, so we'll concentrate on the issue below here.

- We can develop more waste infrastructure in London so that we can use our waste to create new products, power, heat and
  jobs (after recycling opportunities have been exhausted up to 40% of our waste can be used to generate energy).

Managing more of our waste within London's boundaries

The economic opportunity our waste offers can be taken advantage of if we take more responsibility for managing London’s waste within the city itself. If we treated more of our waste in London’s boundaries we could:

- Use our recycled waste to make new products, saving money on manufacturing from virgin materials

- Use it to provide low-carbon heat and energy for homes, public and private buildings. This energy can be sold to offset waste disposal costs

- Create jobs, skills and training opportunities for Londoners in the waste, energy and skills sectors

- Provide local energy to reduce reliance on grid electricity, most of which is generated using fossil fuels (e.g. coal and gas).

At the moment instead of using this waste to generate heat or energy in London much is sent outside and so we lose out on the benefits listed above. The Mayor wants to change this and help London make the most of it waste resource by encouraging more and better waste infrastructure (including recycling and reuse plants and facilities which use waste to produce energy) within London so we can reap the benefits for local use.

To what extent do you agree or disagree that we should be developing more of these waste treament sites in London?

- ○ *Strongly agree*
- ○ *Tend to agree*
- ○ *Neither agree nor disagree*
- ○ *Tend to disagree*
- ○ *Strongly disagree*

When we asked 1000 Londoners this question almost 9 out of 10 agreed that we should be developing this infrastructure in London - 67% strongly agreed and a further 20% said that they tended to agree.

Before London can make the most if its waste we need to deliver the right infrastructure. The Mayor, through the London Waste and Recycling Board will work to support this by providing funding (about £36 million) to catalyse infrastructure development and coordinating the identification of appropriate waste sites. Specifically he will encourage development of:

- New and improved facilities for reuse, recycling, composting and renewable energy in London
- Introducing new technologies to London to treat waste to produce energy from waste
- Retrofitting existing energy generation plants to use heat as well as electricity produced to improve their efficiency
- Food waste projects to generate renewable heat and power and compost material
- Local heat infrastructure to supply affordable low-carbon heat to local housing and public and private buildings

The Mayor will also use his planning powers to consider all aspects of new waste treatment sites including good design and the development of new technologies.

How do you feel about the prospect of more waste treatment facilities in London?

What do you see as the the potential pros and cons?

Keeping our streets clean and tidy

The Mayor believes that Londoners should enjoy a consistently high standard of street cleanliness regardless of whether they are living, working or just visiting in London.

The Mayor will work with Boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in.

To help achieve this the Mayor will:

- Work with London Boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping

- Work with Boroughs to improve enforcement of environmental crimes, including litter and graffiti

- Encourage Boroughs to recycle or compost their street cleaning waste where practical

- Work with a range of partners to provide on-street recycling opportunities and to recycle waste from London's events

- Undertake the biggest clean-up ever after the 2012 Olympic and Paralympic games

- Work with partners to develop a road map towards a plastic bag free London

- Work to pilot a biodegradable chewing gum to reduce the blight of gum on the streets

- Develop a Londonwide smoking related litter reduction programme

- Work with Transport for London and London underground to empower Londoners and visitors to be more responsible with their rubbish whilst using the transport system.

Thinking about your local area, to what extent do you agree or disagree that the streets and public spaces are clean and litter free?

- ○ Strongly agree
- ○ Tend to agree
- ○ Neither agree nor disagree
- ○ Tend to disagree
- ○ Strongly disagree

We asked around 1000 Londoners the same question and around 6 in 10 agreed that their local streets and public spaces are clean and litter free (20% strongly agreed, 39% tended to agree). A third disagreed.

Do you think that the Mayor's actions to keep streets clean and tidy will achieve his vision? What do you think should be his key considerations?

What do you think should be the priorities for keeping London's streets clean and tidy?

About you

To help us understand who has what type of views so we can be more targetted with our work please tell us a bit about yourself.

Are you male or female?

- ○ *Male*
- ○ *Female*

And which age category do you fall in?

--Click Here--

- *Under 16*
- *16-24*
- *25-34*
- *35-44*
- *45-54*
- *55-65*
- *65+*

Which London Borough do you live in?

--Click Here--

- *Barking & Dagenham*
- *Barnet*
- *Bexley*
- *Brent*
- *Bromley*
- *Camden*
- *City of London*
- *Croydon*
- *Ealing*
- *Enfield*
- *Greenwich*
- *Hackney*
- *Hammersmith & Fulham*
- *Haringey*
- *Harrow*
- *Havering*
- *Hillingdon*
- *Hounslow*
- *Islington*
- *Kensington & Chelsea*
- *Kingston*
- *Lambeth*
- *Lewisham*
- *Merton*
- *Newham*
- *Redbridge*
- *Richmond*
- *Southwark*
- *Sutton*
- *Tower Hamlets*
- *Waltham Forest*
- *Wandsworth*
- *Westminster*

We'd like to be able to let you know how you can have your say in what the Mayor does in the future. Would you be interested in receiving more information about consultations as they come up?

☐ *Yes*

☐ *No*

Please give us your name

And your email address, and we'll be in touch soon

Thanks for taking part in our survey. If you would like to comment further or read the full strategy please refer to the waste consultation web pages - a link is available from the front page of our website.

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APPENDIX 2: STAKEHOLDER CONSULTATION RESPONSE TO THE MAYOR'S DRAFT MUNICIPAL WASTE MANAGEMENT STRATEGY

Director of Environment and Operations
The London Borough of Barnet,
Building 4, North London Business Park
Oakleigh Rd South,
London N11 1NP

Mr B Johnson
Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

contact: Nicola Cross
tel: 020 8359 7404
e-mail: nicola.cross@barnet.gov.uk
fax: 0870 889 6811
date: 12 January 2011
our reference: NC/593
your reference:

Dear ~~Mr Johnson~~ Boris,

Re: Public consultation on the Mayor's Draft Municipal Waste Management Strategy

In respect to Barnet's response to your consultation I would like to draw your attention to the following points:

- The draft strategy proposes waste reduction and recycling targets (Proposals 1.1 and 4.1). In my view these targets need to take into account housing growth, which is expected to be significant in Barnet. The targets set out seem very ambitious given current performance and financial circumstances.

- The draft strategy proposes setting an emissions performance standard (Proposal 2.2). Services, budgets, performance and Landfill Tax are all based on tonnage, therefore the standard should be advisory rather than mandatory.

- The draft strategy proposes achieving a high level of street cleanliness (Policy 6). Boroughs should continue to lead on local decisions and service delivery as they are best placed to do this.

Please find attached our full response to your consultation.

Yours sincerely

All best wishes

Brian

Councillor Brian Coleman AM
Cabinet Member for Environment and Transport

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

The key issues are:

- The availability of funding to provide cost-effective services and initiatives, and ongoing servicing of these
- The availability of infrastructure such as waste facilities to enable service developments and delivery
- Communication to effectively engage with the public and relevant stakeholders
- Public participation and awareness of recycling, reuse and reduction

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

Objectives that are designed to deliver long term behaviour change in relation to waste should be developed and encouraged.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision
Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy
The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

The Mayor's targets should take into account the expected growth in the number of households within the boroughs. The London Borough of Barnet expects increased waste arisings as a result of significant growth in the number of households.
The proposed targets appear to be very challenging and optimistic given that local authorities do not have direct control and influence on household behaviour, and major new wins have not been identified as yet to deliver these. Further evidence on the achievability of these targets should be provided.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

The key considerations are:

- Buy-in from all London Boroughs to provide a uniform approach for residents, to enable wide and consistent publicity about the reuse network.
- The need to ensure that the reuse network would dovetail with existing bulky waste services, some of which collect items for disposal as well as reuse.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

N/A

6. Any further comments on this policy?

No.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

The increasing focus on initiatives and policies to reduce carbon impacts is understood. However, there are a number of significant barriers to the implementation of the EPS as a mandatory policy. These include the fact that boroughs will have scoped their services and budgets on a tonnage basis. Boroughs and waste disposal authorities also pay for landfill tax on a tonnage basis, and work to mitigate these costs on that basis. A fundamental change at this scale would be more appropriate at a European level. Therefore it is suggested that the EPS is taken forward as an advisory tool, and is not a statutory requirement.

8. Any further comments on this policy?

No.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

The key issues are:

- The need to encourage innovation and retain local boroughs' control
- The achievement of value for money
- The need to make informed decisions about the relative benefits of joint waste contracts across a number of boroughs as compared with the benefits of integrated contracts for a wider range of street-based services *within* boroughs.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

This question applies to unitary authorities or waste disposal authorities, and Barnet Council is neither of these.

11. Any further comments on this policy?

No.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

The key barriers are:

- Consistent messaging about recycling and composting to the public
- Access to a comprehensive range of recycling and composting services to all residents (not necessarily uniform services across London)
- The availability of funding to provide cost-effective services and initiatives, and ongoing servicing of these
- The availability of infrastructure such as waste facilities to enable service developments and delivery

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

The recycling targets seem very ambitious given current performance and financial circumstances. The 60% target in 2031 is extremely challenging. The achievement of such a target would depend on significant changes in resident behaviour over time, and significant investment by boroughs in the roll-out of waste services, including expansion of existing services to collect business waste for recycling in many cases. In addition, London does have more flats and less garden waste than at the national level, which reduces its ability to achieve very high recycling and composting rates. At the present time this target is not realistic, and the existing national target of 50% recycling, composting and reuse by 2020 acts as a sufficient aspiration.

14. What specific role do you think the Mayor has to play in improving recycling across London?

The Mayor is uniquely placed to coordinate London-wide communications campaigns, including through Recycle for London. Future campaigns could also be aimed at businesses.

15. Any further comments on this policy?

No.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

- The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

The preference for regional self-sufficiency is understood. However, this proposal should allow waste authorities to take pragmatic decisions about the management of their waste, to achieve the right balance between carbon, diversion and cost considerations. The self sufficiency requirement should be flexible enough to allow for the most appropriate decision to be made.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The key barriers include:

- The availability of sufficient existing facilities within the boundaries of London.
- The availability of suitable land in London within close proximity to the source of the waste to be managed.
- The risk of significant planning delays over applications for future waste management facilities within a heavily populated city.

18. Any further comments on this policy?

No.

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:
Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

The Mayor should take a strategic overview of this issue, such as developing and supporting London-wide anti-litter media campaigns. However London Boroughs should continue to lead on local decisions and service delivery, as they are best placed to do this.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

The Mayor is well positioned to promote high-level campaigns on this issue.

21. Any further comments on this policy?

No.

About your organisation

22. Name

Nicola Cross
Environmental Services Manager – Waste Strategy

23. Organisation

London Borough of Barnet

24. Address

North London Business Park
Oakleigh Road South
London
N11 1NP

25. Type of organisation

- [x] London Borough
- [ ] Central Government
- [ ] Third sector
- [ ] Private waste sector
- [ ] Other

Please specify

26. Approximately how many people does your organisation employ?

- [ ] 0-50
- [ ] 51-250
- [x] 251+

Thanks for taking part!

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

- To ensure that sufficient recycling/disposal infrastructure is put in place when planning new and old residential properties, particularly when considering flats (this can be done through planning having a clear understanding of waste management needs and backing through legislation and policy changes).
- To improve policies and increase lobbying on companies that create packaging
- To create new opportunities for processing recyclable material to keep costs down and promote 'closed loop recycling' in this country
- To create incentive based schemes that will boost recycling and reduce residual waste by positive reinforcement

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

- More consideration should be made to encourage the manufacturers of this new raw material to also remain within London's boundary.
- Food waste reduction for resident's and businesses is a key area that needs to be given more consideration in this strategy.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision

Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy

The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. **What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?**

The Mayor, in common with local government, has little influence on waste reduction as it deals with the end of the resource pipeline. Therefore the targets set for reduction and reuse would be challenging because historically new properties mean additional waste, and new properties in London are likely to be flats which are difficult to communicate with (and recycle from). The targets would be more achievable if the manufacturing, distribution and retail industries were engaged in the process as they have the ability to create and sell closed loop products which reduce waste and enable the reuse of products.

Food waste reduction is a key area that we do not think has been given enough consideration in this strategy and should have its own place in Proposal 1.3.

An accurate and robust reporting system would also need to be introduced to enable tonnages to be calculated. This will allow the assessment of progress towards the targets.

4. **What do you see as the key considerations for developing a successful London-wide reuse network?**

The Mayor needs to increase infrastructure in London to collect, repair and store suitable goods and materials and existing outlets need to be built on to divert more waste. This will need investment which could be difficult in current climes.

An accurate and robust system for monitoring and recording reuse and repair also needs to be introduced.

The social benefits that often come with such projects; ie training, helping the long term unemployed get back into work and providing affordable furniture should also be considered and implemented if possible.

High-level regional communications and promotion is required for this initiative to succeed. It is important that the mayor encourages businesses to utilise this new resource.

5. **Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?**

Coca Cola, Sidcup
DVLA, Sidcup

6. **Any further comments on this policy?**

It will be very good to have a London-wide Reuse Network rather than lots of local ones as it should be more stable in the long term and create more opportunities for reuse. This will make it easier for local authorities and businesses to engage with the practice.

If communication is funded until 2013 and then stops or the message is changed then the good message may be lost. Engaged residents still need a continual reminder and those that are not need to hear how important it is to think about their waste disposal habits.

Consumers need to be able to identify whether an item can be easily repaired or reused so a reuse standard should be introduced to assist them in their choice.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

The approach is sensible in determining lifecycle performance however all authorities are at different stages in their contract procurement. Most waste disposal contracts are let on a long term basis and if just started will not need renewing for perhaps 20 + years. It will therefore take a long time before every authority can use this approach.

It is also at odds with the current national and regional tonnage based targets that Local Authorities are working towards. Figure 16 on page 94 shows that EPS standards will be met at fixed tonnages of recycling. It would therefore be easier to continue with the tonnage based targets rather than model each individual case.

Waste authorities also need to consider overall cost, value for money, reliability and finance available when making their decisions. Therefore an EPS is an ideal but may not always be possible to meet when taking all of these other criteria into account and at a time when local authority finance is constrained.

The carbon cost from the wider benefits of recycling also needs to be included in the accounting to add to a waste authority's balance sheet e.g. the carbon saved by the separate collection of glass and its reuse as feedstock for new bottles.

8. **Any further comments on this policy?**

Waste authorities have many considerations in their decision making process including overall cost, value for money and the reliability of the technology. Therefore the cost and environmental impact of new technologies being constructed compared to updating older ones by retrofitting to become CO2 effective technology needs to be considered.

Any additional costs from using more efficient technologies will need to be met by someone? The Mayor does therefore need to engage with the industry and we are pleased that he has agreed to do this.

Monitoring and reporting of this standard will cause resource implications which need to be planned and financed.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. **What do you think are the key issues in establishing joint procurement contracts for waste authorities?**

Joint procurement contracts can be successful however it is totally dependant on local issues and circumstances being suitable. For example the alignment of contract start dates or current services. They are also extremely time consuming and resource intensive which needs to be planned and financed to make sure that the economies of scale are met.

10. **What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?**

Help with planning, investment, expertise and incentives.

11. **Any further comments on this policy?**

Drawing down services from a framework of waste collection contracts could work with some materials such as textiles that have fairly straightforward services but would be more difficult when it comes to the complex services that Local Authorities provide i.e kerbside services. This is because the framework is unlikely to include local circumstances that could affect the smooth running of Local Authority services.

Any contracts that are produced for the framework cannot be too prescriptive as some contracts are very long at 10 to 20 years and variable markets need to be taken into account of.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

To maximise recycling in a Borough you need more than one recycling system to reach all property types and to enable access to all residents wherever they live, work and socialise. This is the only way for it to become a straightforward part of Londoners' lives. For example, in Bexley we have a household scheme which includes the fortnightly collection of waste in wheeled bins and the weekly collection of recycling. Houses that have not got the room for storage bins have both their waste collected weekly in bags and their recycling collected weekly in boxes. There is also the flats recycling scheme which we are adding a flats above shops element to in the new year. On top of this we have an on the go recycling scheme. Each scheme has its collection tailored to the property type or way that recycling takes place to ensure that residents can recycle as easily as possible and we feel that this has enabled our success so far.

The main barrier is the lack of collection services to hard to reach properties such as flats and apartments which make up a large proportion of some London boroughs. Also the difficulty in communication to residents that live in such properties in part connected to their transient nature.

Other barriers include lack of infrastructure, the different priorities of people and the ease of access and cleanliness of communal waste points

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

The varied nature of the 33 London boroughs (LB) means that these recycling targets will be hard to reach as the outer LB will need to over achieve the Mayor's target to enable London to attain them. This is because the inner LB may not be able to achieve the level required due to the lack of gardens and increased number of flats that they have in their area which give them a greater challenge.

To meet the targets the outer London boroughs (LB) need to add best practice elements to their services from the higher performing outer LB due to their similarities. The inner LB should also do the same with best practice elements being added from the higher performing inner LB. London may even end up with a fairly standardised service if this growth occurs although this is a very long term ambition!

14. What specific role do you think the Mayor has to play in improving recycling across London?

In order for Local Authorities (LA) to achieve the services required to meet the targets, sufficient infrastructure to collect, treat and process the materials into saleable products is required. The Mayor therefore needs to encourage the recycling and reprocessing sector in London to provide further employment and economic opportunities.

Collection infrastructure development would also have a major impact on the types of services that LA could offer residents. In most cases additional materials collected will feed into an existing processing infrastructure. The Mayor should therefore encourage LWaRB to invest in LA collection infrastructure also, which is not necessarily tied into the provision of new processing infrastructure. These measures will help LA with providing new, better and more cost effective services.

15. **Any further comments on this policy?**

Reduction and reuse of waste are at the top of the waste hierarchy and should be the focus of the strategy. Incentives for recycling therefore must not disincentivise people to reduce and reuse their waste. For example, the food to fuel initiative is a great idea but should not limit food waste reduction schemes.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

– The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

– The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

– The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think that London should be working towards a vision where it manages most of its waste within its boundaries?

Yes but the vision should recognise that waste will still have to cross London's boundary (in both directions) in order to be treated locally. There should not be a ban on waste being exported if it makes geographic sense to do so under the proximity argument.
Note: This should include municipal and commercial and industrial waste.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

Planning, the provision of land and agreed contracts are all barriers to the development of infrastructure. If the uncertainty of them is removed then waste authorities and the market should be able to deliver the investment.

18. Any further comments on this policy?

We are very pleased that the Mayor will be encouraging the use of sustainable modes of transport for waste. With the development of new waste infrastructure it is a perfect opportunity to develop wharves', canals and railheads at the same time. However, there are significant costs in swapping transport modes unless the journey length is substantially long and if we are aiming to manage waste within our boundaries these costs may not be worth it.

Policy 6: Achieving a high level of street cleanliness

Vision
Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy
The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:
Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

A levy should be added to distributers of London's free newspapers to cover the cost of retrieving and recycling them.

There should be a wider campaign focussed on reducing cigarette butts and gum waste. Perhaps creating a 'Take it with you' litter campaign promoting Londoners to be responsible for their own waste.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

The mayor's role should be to engage related industries and funding to implement a behavioural change communication campaign related to litter items. Schemes that run across London that individual Boroughs can link into are ideal. The London mobile and online reporting and recording tool proposed by the Mayor is a very good idea and will work well on a London wide basis.

21. **Any further comments on this policy?**

Bexley is very pleased that the Mayor will be working with TfL to improve the provision of recycling and litter-bins inside stations and on platforms because so much waste and recycling is produced when people are travelling. However a very good communication campaign is needed to ensure that the scheme is used and contamination is low. Equally 'on the go' schemes are a good idea but their performance can be extremely poor. The on-going costs of education, enforcement and collection are therefore extremely important and need to be funded somehow?

About your organisation

22. **Name:**

___**Stephen Didsbury**_____

23. **Organisation:**

_____**London Borough of Bexley**_____

24. **Address:**

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DA145HS

25. **Type of organisation**

- [x] London Borough
- [ ] Central Government
- [ ] Third sector
- [ ] Private waste sector
- [ ] Other

Please specify

_____

_____

26. **Approximately how many people does your organisation employ?**

- [ ] 0-50
- [ ] 51-250
- [x] 251+

Thanks for taking part!

London Borough of Camden response to The Mayor's Draft Municipal Waste Management Strategy

Name: Richard Bradbury

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General Comments

- The consultation period for the Mayor's draft Waste strategy should be extended to allow respondents to properly reflect the outcome of the current Government review of waste policy. Until this review is completed, results assessed and put forward into a new national strategy then the consultation on the Mayor's strategy seems premature.

The Vision

"The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible."

1) What do you think are the key issues that need to be addressed in order to achieve this vision?

The key issues to achieve this vision are referred to within this consultation response. These include:

- Reducing the amount of municipal waste generated across London;
- Promoting and increasing re-use activities. Supporting the development of relevant re-use infrastructure and an improved uniform coverage across London;
- Increasing recycling and composting performance across the municipal waste sector;
- A focus on preventing materials becoming waste in the first place, resulting in an emphasis on supply-side proposals and producer responsibility, and;
- Developing a supportive environment for the development of new, low carbon, waste processing infrastructure to enable waste management activity at the highest possible level of the waste hierarchy.

The Objectives

"The Mayor has identified the following objectives to help achieve his vision:

- *To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.*

- *To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.*

- *To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.*

- *To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure."*

2) Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

London Borough of Camden believes that these are the correct objectives for the Mayor's waste strategy.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling

3) What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

The GLA is in a good position to deliver this commendable objective via the "Recycle for London" (RfL) campaign, with funds awarded by the London Waste and Recycling Board (LWaRB).

Reducing the amount of household waste is a commendable aim and from a north London perspective the targets for reduction and reuse seem ambitious and challenging enough to drive improvement.

The Strategy does not contain proposals sufficient to ensure that an overall 20% reduction per household will be achieved. Also, for the targets to be realistic investment in infrastructure as well as behavioural change is required; they can be achievable as long as they are supported with an accurate and robust system for monitoring and recording, an appropriate level of effort on communications to impact on material demand and a supportive national framework to influence supply.

The Strategy should recognise the limited impact London's waste authorities can have on influencing the quantities of household waste requiring collection. In particular, levels of economic growth and industry measures to reduce packaging waste are likely to have substantial impacts on waste arisings. Interestingly, the lowest we have seen in the rate of household growth has been during the economic recession, which arguably, is the best scenario to model decreases in household waste and in the north London area, waste growth only reduced by 1%.

The Strategy's support for the introduction of national deposit schemes for bottles and cans could help towards achieving this target by removing them from the household waste stream. However, this would also make the achievement of high recycling targets for municipal waste more difficult. If a national deposit scheme is introduced, it may be necessary to revise recycling targets downwards.

Much "reuse" occurs before items are discarded and become "waste" (e.g. through the private sale and exchange of second hand goods). As such, "re-use" can be considered an option that sits above the Waste Hierarchy as well as within it. The strategy could propose to do more to promote the re-use of goods before they get discarded as waste (e.g. through promoting private re-sale via EBay, car boot sales etc) even if this is strictly beyond the scope of a waste management strategy.

It should be noted that items collected for "re-use" are not "waste" and that this may affect some of the Mayor's calculations.

Camden supports the move towards 'zero waste to landfill' providing timescales allow for infrastructure development and the policy allows for a minimal amount of residual waste to landfill (where reprocessing technology requires).

4) What do you see as the key considerations for developing a successful London-wide reuse network?

Through work with the North London Waste Authority (NLWA) Camden hopes to benefit from the development of the London Re-use Network (LRN). A key consideration for developing an effective operating re-use network is finding a sufficient market for reused items if collection for reuse increases. Camden considers that the proposal of a London-wide reuse network would be an effective way in which to develop the sector and provide support to increase reuse rates.

The number and type of materials included in the target will also determine whether the targets are achievable. According to the "-100 kg European Campaign for Waste Reduction[1]" a series of preventative actions carried out on four waste streams (organic, paper, packaging and bulky waste) have a reduction potential of 100kg/year. Therefore, identification and reduction

[1] http://www.acrplus.org/-kg

potential of materials to be targeted will also determine whether it is realistic for local authorities to achieve the targets.

Apart from resolving the capacity gap, a consideration for the future is how the proposal would enable centralised publicity campaigns to be undertaken to raise awareness of residents about the reuse services available to them.

It might be possible that LRN might also contribute to providing greater opportunities for third sector organisations and small businesses in terms of both bidding for and providing reuse services to the public sector in London. the social benefits of the service, perhaps in providing training opportunities through a repair and refurbishment service, in addition to consideration of the benefits of providing refurbished household items for people in need are also taken into account, then the reconfiguration of contracts to include reuse may be more attractive.

The Localism Bill outlines that the Mayor of London will be required to produce a document known as 'The London Environmental Strategy', detailing his general assessment of the environment in greater London and including proposals for municipal waste management policy. It is unclear, and given the timing of the municipal waste management strategy consultation understandable, how this broader environmental strategy will work alongside the Mayoral waste strategies for both business and municipal waste.

5) Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

N/A

6) Any further comments on this policy?

Support should be sought from the business sector to reduce unnecessary packaging and provide information on whether a product's components can be easily recycled will help consumers make more informed decisions.

Waste reduction targets cannot be achieved without action from the manufacturing industry. Better design and material choice plays a key role in minimising the creation of waste not just at the point of disposal, but throughout a product's lifecycle. Increasing focus on producer responsibility programmes to drive improvements in product design is vital to help influencing consumer behaviour and to ensure that the responsibility for waste management and prevention is shared amongst producers and local authorities.

Policy 2: Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change

7) **What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?**

Camden commends the move towards carbon-based outcomes and acknowledges that the Emission Performance Standard (EPS) and the carbon floor for waste management in London are innovative approaches to the way the Capital seeks to manage its future waste arisings.

Camden also welcomes a focus on climate change in waste management practices and supports a move away from tonnage based targets (national and EU policy objectives) towards carbon-based outcomes.

These policy ambitions may ultimately be incompatible and so must be considered in terms of their ultimate contribution to enabling London become a more environmentally sustainable city, while considering any increased financial burden on authorities. Although the technical appendix states that the EPS has been set at the level of the lowest performing of the six key scenarios which meet the recycling and composting targets set in the strategy it is not clear how it will be workable within the context of requirements to also meet EU tonnage-based targets. The Mayor should demonstrate how the EPS will work with EU tonnage based targets and develop better the detail and impact of its proposed implementation.

If the EPS is to be retained in some form, the Strategy must acknowledge that it is 'work in progress' and subject to review, with the Mayor's proposal for an EPS to be downgraded to a guidance tool, which waste authorities and relevant parties can use voluntarily.

8) Any further comments on this policy?

The EPS assumes energy will be recovered from 'low carbon' waste sources (e.g. food, via his preferred but unproven technology mix) coupled with increased recycling of fossil fuel based materials such as plastics and textiles. The consultants' report acknowledge this could lead to a requirement for separate food waste collections, kerbside sorting of recyclables (associated traffic congestion) and, to help balance the costs, fortnightly residual waste collection. This translates to a heavy financial burden.

The Mayor's advisors have admitted that London boroughs are not currently meeting the EPS, and changes will be required, but no evidence of what this will cost has been provided. Local authorities will not have the resources to provide any waste service that is not based on good economic grounds. No data is currently available that provides evidence that extracting energy from food and green waste is less beneficial in all the circumstances than recycling, yet the Mayors strategy is forcing local authorities to provide these recycling services on the basis that the carbon saving is significant and therefore there

is an overall cost saving.

The consultants' report states that unless "best practice" is adopted, such as Alternate Weekly Collection and kerbside sorting then none of its modelling is reliable. Many authorities in London, particularly in Inner London, will not be able to adopt this best practice. The Mayor must consider the reality of London and ensure that landfill is avoided, energy is recovered and recycling is encouraged without London incurring costs it can ill afford at this time.

The EPS appears to be set on the assumption that the Mayor's waste reduction and recycling targets will be met. It appears that each London Authority may be required to meet or exceed the EPS, in which case London as a whole would exceed both the standard and the recycling and waste reduction targets. So whilst it is clear that there is no direct requirement on London's individual waste authorities to meet the Mayor's recycling and reduction targets, the requirement to comply with the EPS at an individual authority level may force them to do so anyway, at least if this achievable without incurring excessive cost, which is doubtful.

The Mayor's waste hierarchy' which is included as part of the approach proposed is different from both the European and national model. Whilst it is difficult because the Mayor's waste strategy is being developed at a time when the new Waste Framework Directive has not yet been fully transposed into the UK and as Waste Strategy 2007 is still in place, the Authority would recommend that the Mayor's approach should follow the new waste hierarchy in the revised Waste Framework Directive namely:

- Prevention
- Preparing for re-use
- Recycling
- Other recovery, e.g. energy recovery; and
- Disposal

In an already complex environment with respect to policy and legislation, the Authority recommends that the Waste Management Hierarchy enshrined within the Waste Framework Directive to be transposed to UK legislation by January 2011 is a more appropriate hierarchy to be followed.

Policy 3: Capture the economic benefits of municipal waste management

9) What do you think are the key issues in establishing joint procurement contracts for waste authorities?

There is little need for the Mayor to get involved in drawing frameworks for collection services and then monitoring any resulting contracts and so Proposal 3.2 may be removed entirely from the Strategy. Pressures on waste authority services from public spending cuts mean waste authorities will review opportunities for increasing service efficiencies and performance as a

matter of course. This does not require a separate identification and implementation work stream within the GLA.

10) What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

Policy and finance is central to this ambition. A supportive policy framework and ability to access LWaRB funding would support this ambition. The size of funding available is the most important factor and the key issue tends to be the competitive funding approach that is taken for waste authorities to access LWaRB funds, i.e. there is usually a big fight for a small pot of money.

11) Any further comments on this policy?

London Borough of Camden has no further comment on this policy

Policy 4: Achieving high municipal waste recycling and composting rates

12) What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

There is a lack of consistency between recycling and services from borough to borough. This includes differences with the types and colours of containers provided through to the materials collected for recycling or composting and costs for certain services such as garden waste collections.

People are often unaware of what can be recycled so clear communications and easy access to waste and recycling information is necessary as well as transparency as to where recyclates are treated and what they are made into.

In many parts of London particularly the inner city boroughs there are space constraints for segregating and sorting material types, so schemes should be simple with a minimum number of containers and collection vehicles.

13) What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

As a signatory of the North London Joint Waste Strategy, Camden is signed up to a North recycling and composting rate of 50% by 2020. Waste collection analyses, including contributions from Household Waste and Recycling Centres and residual waste treatment, suggest that this 50% target is extremely challenging in the majority urban setting of North London. Current North London recycling performance stands at around 29%, whereas the national level is around 37%. The lack of green waste from gardens and the high proportion of flatted properties are significant issues to broach in order reach these higher area recycling ambitions.

There is little point in setting unachievable targets. Relevant targets should take into consideration the above issues around green waste as well as the area deprivation, high density housing, transient population and socio-economic circumstances prevalent in the region.

It is unlikely that any single approach would result in both the greatest environmental benefits and the greatest financial benefits; there will often be a trade-off between the two. As it stands, it is unclear whether this policy supports measures the achieve environmental benefits through recycling at a net financial cost. This policy would, therefore, be clearer if it were amended to "*Achieving high recycling or composting rates resulting in the greatest environmental at acceptable financial cost."* There is a significant risk that forcing waste collection authorities to chase high recycling targets would result in greatly increased collection costs for little or no environmental benefit.

14) What specific role do you think the Mayor has to play in improving recycling across London?

The Mayor can lobby Government to change legislation / policy where it is obstructive to improving the opportunities for managing waste and recycling. For example composting targets encourage garden waste collections which work against waste minimisation targets. Retailers and manufacturers should also be made more accountable for reducing packaging.

The Mayor should provide London-wide communications so that people understand recycling better and will take responsibility for their waste rather than push it on to local authorities.

The Mayor can help facilitate the establishment of more waste infrastructure in London to make recycling easier, more competitive, environmentally sustainbale (proximity principle) and create local employment opportunities as well as support more waste minimisation initiatives.

15) Any further comments on this policy?

There is a need to support small businesses with their waste management responsibilities, highlighting how the London Waste and Recycling Board can help in disseminating good practice. There could also be a stronger regional campaign to ensure businesses are aware of their responsibilities and good practice for their own waste management.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

16) Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

London Borough of Camden agrees that London should be working towards a vision where it manages most of its waste within its boundaries as long as this

does not jeopardise what may be a more environmentally friendly solution in terms of the carbon impact and as long as the definition of waste managed in London is a reasonable definition, particularly where solid recovered fuel is concerned.

London Borough of Camden commends this proposal, however without funds this will be impossible to deliver. Other key issues, particularly in the London context are land costs, planning environment and the access to a trained workforce, otherwise there are other locations that are more attractive to the private sector.

Self-sufficiency should be considered more openly and transparently in the context of exchanges at the economic and social levels between the Home Counties and London. Factors such as the levels of waste coming into London from the Home Counties as well as forecasted capacity of the relevant landfill sites should also be considered.

17) What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

Financing is a key issue. We welcome the LWaRB investment in waste processing, but are concerned that public funds are being used to finance investment in private sector facilities handling commercial waste with limited or no benefit returning to the public sector in some cases. Waste facilities have fairly discrete geographic catchment areas so that the element of price competition between LWaRB supported facilities (as well as with non-LWaRB supported plants) is likely to be minimal leaving the public sector with little or no benefit, even in terms of competitive gate fees from the supported facilities.

Other key issues, particularly in the London context are land costs, planning environment and the access to a trained workforce.

18) Any further comments on this policy?

London Borough of Camden commends the Mayor’s proposal to promote sustainable forms of transport. We believe that the Mayor will need to go beyond promoting and move to looking at how funds for sustainable transport can be accessed.

As a constituent borough of the North London Waste Authority Camden has seen a detailed study on water transport from the Edmonton site which TfL and British Waterways identified as a very comprehensive study and TfL requested to publish the report on their website. The findings of the study identified that transport of material (i.e. MSW, SRF, recyclates) is technically feasible from this site, however, there are numerous considerations to take into account for example, the locks, cost and economics, dredging, contract length etc. The Mayor could consider assisting, where possible in these particular areas.

Policy 6: Achieving a high level of street cleanliness

19) What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

Focussed work should take place with relevant establishments (pubs, bars, restaurants, offices) that do not offer smoking litter receptacles. A similar model could be created to that for chewing gum, where manufacturers pay in to a national fund to focus behaviour change campaigning in areas of most need.

The Mayor should engage relevant commercial partners and explore funding opportunities to implement regional campaigns and initiatives to engender behavioural change on waste and litter across London's residents, visitors to London and commercial enterprises.

Specific sectors for this engagement are construction contractors and service delivery contractors (waste management companies), who are key to supporting a cleaner London. Capital Ambition can also provide research to support the development of efficient cleansing service delivery.

20) What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

An overarching regional campaign brand focussing on clean streets in London that local authorities can add value to on a local level. A programme approach looking at awareness raising, efficiency in operations, good practice, lobbying, training and cleanliness surveying could help bring all relevant stakeholders together to improve cleanliness across the Capital.

To ensure that London is as clean as possible over the Olympic period the Mayor should seek to secure Olympic funds to enable the boroughs to provide enhanced cleansing services in the run up to and during that time.

Camden supports the proposed London-wide volunteer clean-up work. Camden officers co-ordinate the local contribution to the annual Capital Clean-Up campaign. Officers link up with colleagues from the Youth Offending Team, Probation Team, Safer Neighbourhood Teams, Police Cadets, Network Rail, Thames21 and MacDonalds. The local campaign undertakes; graffiti removal; litter picks; enforcement operations, and; carries out awareness raising events (including dog control issues and smoking related litter). The 'stop and search' operations, linking up with neighbouring boroughs and a host of related organisations, have been a particular success.

There is, however, a need for central co-ordination and support for this campaign and we would like to see the Mayor commit resources to enable this campaign to continue its success. Particular areas of Mayoral support would be in the areas of; engaging volunteers; coordinating campaign resources and actions, and; promoting the campaign.

21) Any further comments on this policy?

The proposals are commendable; however, this part of the strategy should be extracted into a separate non-statutory document or be treated as an appendix to the strategy, making it clear that it does not fall within the Mayor's municipal waste powers.

Restricting this policy to "street cleanliness" excludes other public open places such as parks, open housing estate land and commercially managed open public areas. References to "street cleanliness" should be replaced with "cleanliness of the public realm".

The issues that impact on environmental cleanliness are ever changing and so regular and robust cleanliness monitoring is required to keep track of trends in local environmental quality and to structure focussed decision-making to tackle current issues affecting the Capital's environment.

The London-wide introduction of the 'Love Clean Streets' on-line reporting tool must be considered in the context of current local authority reporting streams and assessed against the proposed implementation costs.

RESPONSE ENDS

From: **Councillor Nicholas Paget-Brown**
Cabinet Member for Transportation, Environment and Leisure

NPB / km
14 January 2010

Boris Johnson
Mayor of London
City Hall
The Queen's Walk
LONDON
SE1 2AA

RESPONSE TO YOUR PUBLIC CONSULTATION DRAFT MUNICIPAL WASTE MANAGEMENT STRATEGY

I am responding on behalf of the Council of the Royal Borough of Kensington and Chelsea to the public consultation (October 2010) on your Municipal Waste Management Strategy. I want to be sure that I respond within your deadline, and so I send this response even though our Key Decision making process has not yet run its full course. I will let you know if any amendments arise as a result of that process.

I welcome much of the Strategy. The emphasis on waste reduction is right, and the drive to minimise carbon emissions is laudable. We support your focus on carbon reduction, and we are striving to minimise our own carbon emissions across all our services. However, I have concerns with a number of your proposals. I have summarised our concerns in this letter. More details are set out in the responses to your specific consultation questions.

Waste hierarchy
I do not agree that the waste hierarchy in London should be different from the hierarchy in England and Europe. I consider this creates a risk of inconsistency between regional, national, and international policy that could leave London's local authorities in a difficult position, especially during the procurement of waste management services. If you wish to promote a different waste hierarchy I consider that it would be better if you did so by lobbying government for change.

Recycling targets
The recycling targets you propose are out of our reach. I agree that non-household waste should not be ignored, but I do not think it is realistic to apply such demanding targets to *municipal* waste given that local authorities have to operate

in a free market when collecting commercial waste. I repeat what I said in response to your Assembly draft: you have set recycling targets for London that the inner London authorities cannot hope to achieve without very substantial new investment by the boroughs – investment that we will struggle to pay for given the financial savings we must make.

I am afraid to say that it will be impossible for Kensington and Chelsea to achieve, or even approach, the targets you have specified. You are asking us to move our municipal waste recycling rate from around 25% to 45% in five years. That would require us to recycle an additional 17,000 tonnes by 2015. As a rule of thumb, we work on the assumption that the cost of the initial investment and campaigning required to achieve each additional tonne of recyclable waste is around £200 a tonne; if we try to capture food waste for treatment the cost per tonne would in all probability be much more. On the face of it, hitting your target would probably cost at least an extra £3m per annum, and in the very challenging financial environment that lies ahead for local government, I do not think it at all likely that we can find extra money on the scale required to meet your proposed recycling targets.

Our aim is to maximise the amount of recycling captured (after reducing as much as possible), but we cannot agree to meet the targets you are proposing.

Assumption about value of waste

Your Strategy contains an assumption about the value of waste, and the income that can be achieved from its treatment and re-sale. I do not consider all your assumptions to be well-founded. The value of recyclates fluctuates dramatically from year to year. I do not think it is reasonable to expect local authorities to accept the commercial risks associated with trading in such a volatile market. These risks are better borne by the private sector.

Emissions performance standard

I do not consider that the fundamental science is sufficiently well established to enable you – at this stage - to promote authoritative emissions standards as a mandatory requirement in local authority operational and financial planning. I consider that you have placed too much reliance on the bespoke modelling work of a single consultancy firm, and there is a need to subject what your consultants have done to a peer review process to test their assumptions, their methodology, and their results. I consider there is a real risk that you may be requiring compliance with emissions standards that in time could be discredited, or superseded. I do not consider it reasonable to hold London's local authorities, or the waste industry, to conformity with such standards before they have been tested and achieved widespread acceptance. I very much hope I can persuade you to promote the standards as guidance at this stage, pending further work to establish their scientific credibility. We are more than happy to work with you on the verification and development of the guidance to a point where it becomes authoritative.

I regret that you have based your emissions standard on a comparison with Closed Cycle Gas Turbine plants (CCGTs), and have made the assumption that CCGTs are the energy source to be replaced by Energy from Waste plants such as

Belvedere. I find this surprising given that the Strategy states "virtually all our electricity is produced from large, fossil fuel-powered power stations outside the capital and these stations fail to capture and make use of the waste heat created during the production process". I think that you should have based the standard on the average fuel mix currently used in England, not on one of the best performing options available. I believe you have set the bar for comparison with EfW plants unreasonably high as a result.

I note that, where incineration with energy recovery is a local authority's chosen disposal route, your Strategy promotes the capture of 'biomass' to maximise calorific values. Am I right in thinking that this might encourage perverse outcomes such as ceasing paper and card recycling with a view to incinerating it with energy recovery instead? If so I suggest that the Strategy should be refined to show that is not an acceptable consequence.

I regret you have not yet published the proposed 'ready reckoner' toolkit to assess compliance against the emissions standard. Given the potential importance of your emissions standard for local authority decision-making, I do not think it reasonable to conclude public consultation on your Strategy without local authorities having a chance to understand and comment on the ready reckoner.
The EPS appears to be founded on the principles of life cycle assessment, but I am very disappointed that the assessment appears to exclude transportation of waste as a factor. As you know, a central part of Western Riverside's waste strategy is the transportation of waste downstream on the river, instead of by lorry. I consider this must be relevant to the assessment of the carbon and other benefits of our waste management system as a whole, and it is not reasonable to exclude it from a life cycle assessment.

Can I ask whether you have compared the carbon benefits that can be obtained through investment in waste treatment technologies with the benefits that might be achieved for the same money through less exotic measures, such as home insulation? I am concerned that your Strategy may drive local authorities to buy expensive technologies they cannot afford when investment in other low-tech carbon-reducing measures might be more cost effective.

Financial implications
I am concerned that your Strategy may impose financial burdens on my Council without offering any support or resources. In particular I am worried that your Strategy may force investment in measures to achieve compliance with the emissions standard, even though any benefits and savings would not come back to the Council and there may be no local business case for such investment. For example there would be significant extra costs associated with the separate collection of plastics, textiles, and food waste in the borough, but I cannot see how any savings arising from these measures would find their way back into the Council's budget.

I am also concerned that we will have to commission specialist consultants, at our expense, to advise us on preparing service specifications to ensure compliance with your Strategy.

I regret that your Strategy risks creating commercial uncertainties over the role of the Belvedere EfW plant in meeting London's waste treatment needs. We had expected to reduce our waste disposal costs once the plant was refinanced after successful operation over the next few years. By setting an emissions standard that Belvedere may struggle to meet, you may well lose us that benefit.

Other considerations

I welcome your focus on recycling from flats and businesses.

We have some reservations about the local impact of 'on-the-go' recycling which would mean installing more containers in public spaces in conflict with our streetscape policies.

I welcome your policy 6 on achieving a high level of street cleanliness in London. The amount of investment in street cleanliness is ultimately a matter for individual local authorities, which all face tough choices about priorities at the moment. That said, I personally very much welcome your willingness to tackle the damage caused by chewing gum. I hope I can call on you to support my view (expressed in my letter in October last year to Greg Hands MP), that the introduction of a tax on non-biodegradable chewing gum is long overdue.

I consider that it would be wise to await the outcome of the review of the Waste Strategy 2007 before closing consultation on your Strategy.

Conclusions

I support the broad thrust of your draft Strategy, but it has serious and not always welcome implications for London's local authorities. In particular we cannot agree to the imposition on individual local authorities of the recycling targets you propose, nor can we accept the imposition of the emissions standards as standards. I urge you to consider adopting the emissions standards as guidance at this stage, until peer review has demonstrated that they are based on a scientific consensus.

I hardly need say that the Strategy comes at a time of financial pressure on London's local authorities. I hope you will consider carefully the affordability of your proposals when preparing the final text of the Strategy.

Yours sincerely

Councillor Nicholas Paget-Brown
Cabinet Member for Transportation, Environment and Leisure

cc Cllr Merrick Cockell, Leader of the Council
Cllr Ahern, Chairman WRWA

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

The proposals contained in the Strategy to achieve this vision should be guidance, and not an imposed standard.

The Strategy needs to recognise that the geographic and demographic make-up varies considerably across London, and that this impacts on boroughs' ability, and affordability, to change behaviours and collection methods. For example, a high proportion of inner London borough dwellings are flats. In Kensington and Chelsea, they are mostly four or five storey properties where waste is stored in basements and there is limited, or no, space for different waste stream receptacles. Inclusion of the means to source separate waste in the kitchen in new build, or conversions, would help to improve recycling capture, and waste awareness generally, as would retrofitting properties with storage areas or twin stream chutes where possible.

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The objectives are laudable in principle, but should not be imposed on boroughs for the reasons stated in answer to question 1. In particular, the Emissions Performance Standards (EPS) should be guidance and not required standards.

Furthermore, managing London's msw within its boundary is challenging (and has been the subject of separate communication with you). Page x of the Executive Summary of the Eunomia Report 'Economic Modelling for the Mayor's Municipal Waste Management Strategy' April 2010, states 'recent work undertaken by Eunomia and EMRC on behalf of the GLA showed that the development of new plant might result in exceedences of both NOx and PM10 in specific locations, particularly those near to busy roads. The study concluded, however, that there are large areas of London where waste treatment plant could be located with minimal effect on attainment of air quality objectives. Isolated residual treatment facilities of the types considered in this study – if managed and operating as designed – were therefore considered to be unlikely to have a significant effect on air quality where objectives are not forecast to be exceeded in the future.' Surely this implies that not every borough within London has the suitable space to build waste facilities? This reinforces our case that the required apportionment of land for waste facilities within this densely populated, high traffic, borough is unreasonable.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision

Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy

The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.
- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats
- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.
- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.
- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:

a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

There are worrying aspects of the Eunomia report that have significant implications for us, notably that they state in A.2.2.1 'the combination of increased housing and decreased waste, per household, means that the absolute growth in household waste will be zero'. We are expecting significant development to take place in this borough during the lifespan of this Strategy (over 3000 properties so far identified with potentially many more in the pipeline). It cannot be assumed that waste will not rise as a result.

A six month trial of diversion of domestic waste to reuse resulted in 6 tonnes of diverted waste for reuse. Eunomia's assumption that the non-household municipal waste will grow by 30% by 2031, combined with the challenging Strategy targets on reuse of municipal (not just domestic) waste, imply that Authorities will need to establish comprehensive business reuse services. Methods, availability of suitable tonnage in the business waste stream, charging levels, vehicle and crew requirements, and any other implications are not clear. Whilst we agree with the aim to repair and reuse material, we cannot agree to these targets without understanding the implications.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

See comments under q3. The logistics of arranging collections of items for reuse can be quite demanding (for example where will the items be presented, by whom, does it involve entry into premises, insurance implications?)

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

No comment.

6. Any further comments on this policy?

Not at present.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation

benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

The policy should set the standard at the electricity (grid) and/or natural gas (grid) average rather than CCGT. Setting the standard against CCGT is not representative of the existing energy generation being replaced.

It is of course desirable to have the highest efficiency facilities but, practically, it is not that straightforward. Facility efficiency can usually be set high when such measures are incorporated into a plan from its design stage (for example to achieve the highest standard in BREEAM or Code for Sustainable Homes, retrofitting usually cannot deliver as much efficiency as can be achieved at initial design stage). We believe this "minimum" performance should be applied only to new developments.

Policy 2.3 states that "all London's residual municipal waste used for energy generation should have a carbon intensity less than, or equal to, the source of energy generation it replaces (otherwise known as the 'marginal source' of generation)". The Strategy states "virtually all our electricity is produced from large, fossil fuel-powered power stations outside the capital and these stations fail to capture and make use of the waste heat created during the production process"[1]. However, the policy then sets closed cycle gas turbine plants (CCGT) as a minimum standard assuming that CCGTs are the energy source to be replaced by Energy from Waste plants such as that at Belvedere. The policy states the Mayor will set a minimum CO2eq performance. Confusingly, the Strategy asserts that the carbon intensity of CCGT electricity generation is 387g of CO2/kWh and not CO2eq.

The latest DECC-published conversion factors for energy generation (all fuel types) was

[1] pp.71 of the Mayor's Draft Municipal Waste Management Strategy

listed as 539g of CO2 per kWh produced and 543g of CO2eq per kilowatt hour produced[2]. Because the purpose of setting a minimum CO2eq for energy generation is to have a less or equal carbon intensity than the source of energy generation it is replacing, and the Strategy states "virtually all our electricity is produced from large, fossil fuel-powered power stations outside the capital and these stations fail to capture and make use of the waste heat created during the production process"[3], we consider the target should be set at this 543gCO2eq rather than at the level of one of the most efficient forms of energy generations (i.e. CCGT). The expected return at Belvedere is between 400-550g per kWh[4]. Assuming the lower figure was achieved, this equates to almost a 30% reduction in the amount of carbon created in producing a kWh of electricity.

Despite the Strategy aiming to achieve 'zero' landfill by 2025, alternatives to landfill which do not meet the 387g of CO2/kWh target but which still achieve reasonable carbon savings compared to conventional energy generation are not given credit in the Strategy. Additionally, the Mayor is aiming to increase the proportion of waste managed within London (the Mayor proposes two monitoring measures for the effects of the Strategy; waste managed within London and outside London; waste sent to landfill within London and outside London)[5]. Whilst Belvedere is not able to achieve CCGT efficiency standard currently, it is able to increase the proportion of waste managed within London and also divert waste from landfill which significantly contributes to the Mayor's targets.

The strategy states "a key characteristic of the Emissions Performance Standard (EPS) is that it allows flexibility, so that waste authorities can look across the whole waste system to find the greatest CO2eq savings, depending on their specific circumstances" (p.95). It is of course important to aim for a higher standard of waste management facilities but such change cannot happen immediately. The Mayor already proposes to "work with London's incinerator operators to explore opportunities to introduce heat-use infrastructure and improve the incinerators' overall efficiency". Therefore, we look to the Mayor to assist Cory and WRWA to fit CHP in Belvedere so the facility can be ranked higher in the Mayor's waste hierarchy.

One thing that the description of this Policy does not make clear is whether existing facilities are required to meet the standard and if so by when. The situation is less clear for Belvedere which is built but not yet operational.

8. Any further comments on this policy?

The splitting of the Recovery section of the waste hierarchy seems to risk creating a conflict between the waste hierarchy in London and the hierarchy in England and Europe.

It is our contention that Eunomia's reports raise various concerns including their economic assumptions and greenhouse gas modelling. The reports lack clear background and explanation as to their scope and methodology, and are not peer reviewed to demonstrate that they are scientifically robust.

It is comforting to see the Strategy acknowledges that climate change is not the only issue and considers wider environmental issues by employing Lifecycle Assessment

[2] Defra & Decc, 2010, Guidelines to Defra / DECC's Greenhouse Gas Conversion Factors for Company Reporting
[3] pp.71 of the Mayor's Draft Municipal Waste Management Strategy
[4] WRAP, Draft Consultation Response Papers, pp.14
[5] pp.71 of the Mayor's Draft Municipal Waste Management Strategy

(LCA). However, LCA of any kind is known to be very complicated and, depending on its scope/focus, outcomes vary significantly. The Strategy and Eunomia reports do not clearly state their LCA scope.

The Strategy suggests waste authorities should make use of the new toolkit; however, there is very little detail about the nature or even the appearance of this toolkit. Therefore we cannot determine whether transportation activity is within the scope of this toolkit/EPS assessment (although we assume from the rest of the strategy that transport is excluded). Furthermore, aside from the general recycling percentage target, it is not clear whether each authority has to contribute to the overall target equally or whether an authority is able to negotiate a target depending on its current performance, its demography, its built form and other local circumstances. Nor is the relationship (if any) between the EfW target and the collection system target clear.

Without these details, we are unable to determine the potential cost and resource requirements in the future to comply with this requirement. Without such details in the Strategy, no waste authority can provide well-founded feedback/comments and we expect further consultation when more details are finalised.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.
From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

Political will and existing contract expiry dates are crucial considerations. A decision would need to be taken about whether the services should be delivered in the same way, or whether it is desirable and possible to provide them differently, but under a joint contract. The method and responsibility for contract management would have to be determined.

Joint contracts could result in 'super bidders' and monopoly of the market by a very few major companies.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

At the moment, many London boroughs are under the umbrella of disposal authorities who have power of direction over certain wastes. In the case of WRWA, we are locked into arrangements because of the long contract with Cory for Belvedere. Reneging on that contract would carry heavy penalties and costs. It is difficult to see how this situation could change, or indeed whether it would be desirable to change.

11. Any further comments on this policy?

The reliance in the Strategy on recyclate income is high risk (Executive Summary of the Eunomia report, page 8). Recyclables are an internationally traded commodity and in recent years the value of recyclate fluctuated dramatically such that, at one point, piles of recyclable waste accumulated because they had no market value.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.
From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

Lack of waste storage facilities is a serious problem in central London. Separating waste needs to be as easy as possible for residents and businesses. Tackling this issue at source with something as basic as split bin facilities in the kitchen can help greatly with recycling. We are pleased to see building design included in the strategy from this perspective.

A borough with a high transient population, a high proportion of flats, and a multitude of languages, presents particularly difficult challenges when trying to convey messages about waste.

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

We cannot undertake to meet the recycling targets contained in the Strategy. Many authorities achieve high recycling and composting rates by collecting garden waste. This is not an option for local authorities in central London because they lack large gardens to produce this waste in the first place. (And it does not make sense to collect waste that could be home composted simply to push up a Council's recycling rate.) Our most recent analysis of waste composition in 2009 shows that, even if 100% of available household recyclate was extracted from the local residual waste stream, we would still only achieve a maximum of 46.75% 'dry' household recycling. With the increasing lightweighting of packaging, even this percentage will diminish over time, as glass and paper tonnages are likely to reduce within the waste stream. The Strategy makes the achievement of the target even more difficult because it relates to commercial waste as well, and the recycling rate in the municipal commercial sector has remained stubbornly low despite very substantial investment and the offer of incentives to businesses to increase their recycling.

Furthermore, the assumption on page viii of the Executive Summary that 5% and then 10% increases in recycling performance from 45% in 2015 to 50% in 2020, and 60% in 2031 will be easier is wrong; by then it will be more difficult as the easy wins will have been gained.

We note and concur with Eunomia's comment (page ix of their Executive Summary) that they disagree with your proposal to promote an equal level of waste collection service across boroughs because of the different complexities involved.

In addition, it would be useful to know which areas are included in the assumption on page 16 of Eunomia report that 50% of London can move to fortnightly bin collection systems (p16 of the Eunomia report). Kensington and Chelsea will not be one of those boroughs.

Eunomia in their assumptions (page 9) state "all co-mingled, twin stream or kerbside sort systems remain as such, but changes are made in terms of what materials are collected, and the frequency of collection of both the recyclables and refuse...where the materials are collected in a sack, collection frequency becomes weekly (if not already)." They go on to say "Yields from recycling systems are modelled to increase to current maximum levels by 2015...This approach might be considered optimistic and will depend upon behavioural change, but alternatively, to model meeting the 45% target, significant additional tonnage would need to be assumed as captured from non-kerbside schemes, which would appear even more challenging." Kensington and Chelsea cannot reduce its collection frequency to weekly. There is very limited storage capacity for waste, and it is mostly in basement areas (often former coal cellars) many of which are not enclosed, where locating bins can be problematic, and they are usually fronting a domestic residence on the same level. Crews 'pull up' the wastes to pavement level for collection. Even if waste is reduced, it cannot lie around for a week before collection. We therefore cannot benefit from decreased collection costs that would normally flow from reduced collection frequency. We note, and concur with the caveat in the report that the modelling approach might be considered optimistic and will depend on behavioural change and that capturing significant additional tonnage from non-kerbside schemes would be even more challenging.

There appears to be an assumption that authorities will collect food waste: Eunomia state on page 7 that 'it should be emphasised that there is no implied preference as to which Boroughs should change their collection systems first'. In Kensington and Chelsea we would have severe logistical difficulties with this. The storage and

presentation of food waste caddies for collection when few properties have front gardens, and many store waste in shared basement areas, present us with insurmountable difficulties.

14. What specific role do you think the Mayor has to play in improving recycling across London?

We look to the Mayor to promote clear, repeated messages on a continuous basis urging London's residents and businesses to improve their waste and carbon performance. These messages should be in high profile, high footfall areas and public spaces (for example public transport), but could also be adapted for posting in individual multi-occupied properties.

We look to the Mayor's planning policies to include an insistence on fully adequate waste and recycling separation and storage facilities in all new and refurbished housing and commercial developments.

15. Any further comments on this policy?

No.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London
- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.
- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.
- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.
- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.
- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.
- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.
- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.
- The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

Policy 5.4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.
- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

This borough has already expressed its views on this. We disagree with the Mayor's apportionment of land for waste purposes. Some of our comments in response to questions 2 and 10 also apply here.

If waste is a 'resource' as opposed to being a problem, then we see no reason in principle why waste should not be exported from London to other parts of the country where the resource can be exploited for environmental and financial benefits. We would prefer the application of environmental rather than administrative criteria to the assessment of the export of waste from London. If net carbon benefits can be gained from the export of waste (for example by water or rail to an advanced treatment plant) then we would not prioritise a requirement to keep waste within London's administrative boundary.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

Lack of available and suitable land.

18. Any further comments on this policy?

No.

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:

Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake

the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

The vision is commendable. One of the most problematic issues is chewing gum, referred to in 6.7 and 6.9. Chewing gum is unsightly, and difficult, costly, and labour intensive to remove. We are disappointed that these proposals do not yet include reference to a tax on non-biodegradeable gum.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

London-wide messages about rubbish dumping (from large fly tips to individual rubbish bags which can plague inner London) would help to convey a zero-tolerance stance to the anti-social, and even criminal, nature of rubbish dumping.

21. Any further comments on this policy?

It would be helpful if estate agents and managing agents were obliged to convey waste storage and collection arrangements to new occupiers. This could help to improve waste awareness, and to prevent rubbish dumping in the street.

About your organisation

22. Name

Kathy May

23. Organisation

THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

24. Address

Council Offices 37 Pembroke Road London W8 6PW

25. Organisation

THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

25. Type of organisation

☒	London Borough
☐	Central Government
☐	Third sector
☐	Private waste sector
☐	Other (please specify)

26. Approximately how many people does your organisation employ?

☐	0-50
☐	51-250
☒	251+

Thanks for taking part!

Customer Services

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14th January 2011

viewsonwaste@london.gov.uk
Draft Waste Strategy Consultation
City Hall
The Queen's Walk
London SE1 2AA

Dear Sir / Madam

Please find enclosed Lewisham Council's service response to the Mayor of London's draft municipal waste management strategy.

Some of the views expressed in the document are similar to other London authorities, in particular Wandsworth, and so the text may appear similar.

Lewisham would like to add that whilst the Council has a policy priority to improve recycling performance, it must also be economically viable given the current financial climate.

For clarification on any point please contact Sam Kirk, contact details above.

Yours faithfully

Sam Kirk
Strategic Waste & Environment Manager

Municipal Waste Management Strategy Consultation Response January 2011

General Comment

The consultation periods for the Mayor's Energy and Waste strategies should be extended to allow respondents to properly reflect the outcome of current Government consultations in these areas. Until these consultations are completed and the results assessed and put forward into a new national strategy or at least a draft then the consultation on the Mayor's strategy is at best premature.

The Mayor's vision for London's municipal waste

A commendable vision, however:

The Mayor's Waste Hierarchy on p11 differs from that in Article 2 of the 2008 Waste Directive. It would be preferable and less confusing if the same hierarchy was used.

Whilst the vision states that the "…Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it", the draft Strategy only supports movement up the hierarchy where this is associated specifically with a reduction in CO2eq emissions, and does so regardless of whether this also achieves cost savings.

Waste Strategy Objectives

1) Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

The GLA is in a good position to deliver this commendable objective via the "Recycle for London" (RfL) campaign, with funds awarded by LWaRB. Boroughs can also bid for RfL funds to increase participation in local services. However, LWaRB now only has £22.9m of its original £73.4m pot left, which is not much to deliver this objective across London.

2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.

A supported objective. There are however, difficulties with measuring the carbon impacts of London's municipal waste and having a high level of confidence in the data. In particular a) there are substantial differences in the Co2eq figures for different disposal / recovery / recycling processes between different sources of data and b) collection related impacts (vehicles, containers etc) could be significant and should not be ignored.

3. Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.

A supported objective. However, The Mayor should not ignore the additional collection costs associated with achieving high recycling rates which are increasingly likely to exceed the economic value of diverting additional materials from waste disposal as higher rates are reached, especially in the case of Lewisham, whereby alternative waste disposal routes have higher gate fees than the authority currently pays. The strategy appears to count economic benefits of high recycling rates

rather more thoroughly than the costs involved in achieving them. And whilst the costs will be borne by London's waste authorities, not all the economic benefits will flow back to them. Waste collection and disposal needs to be economically viable for authorities, especially in these economic times.

4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

Lewisham already achieves this objective for the majority of its waste, but appreciates that this is a unique position. So, this objective should be secondary to objective 2 above - if the impact of London's municipal waste management on our environment and its carbon footprint can be reduced by managing parts of it outside London's boundary (including transport related impacts), there is little reason not to do so. In particular, a substantial proportion of the waste collected for recycling is likely to be managed outside London's boundary for the foreseeable future.

Targets

1: To achieve zero municipal waste direct to landfill by 2025.

An aspirational target, which Lewisham expects to support and work towards. Lewisham already has one of the lowest rates of municipal waste to landfill in the country (4th lowest in 2008/9 data) and is keen to work towards zero waste to landfill.

However, a key barrier to this is public awareness, responsibility and accountability for the waste that they consume and produce. A number of issues need to be addressed:

- Promotion of waste reduction: reducing and treating waste at source above all other options for waste e.g. real nappies, reuse bottles for tap water, reuse bags for shopping, love food hate waste, followed by home composting.
- Attitudes towards reuse needs to change so that it is no longer seen as only for those in poverty. This is partly changing with sites such as eBay and Freecycle, but more work in this area needs to be undertaken.
- NIMBYism for waste facilities: Waste should no longer be seen as out of site out of mind, but as a resource with a value.
- Recycling: people should undertake smarter shopping and leave packaging at the point of sale as well as take more responsibility over the quality of recycling to reduce contamination. In Lewisham (2009-10) the MRF sent 1,780 tonnes of contaminated recyclate to SELCHP at a cost of £109,470.

2. To reduce the amount of household waste produced from 970kg per household in 2008/09 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household.

Reducing the amount of household waste should be included and it is appropriate to set a target for this.

The Strategy does not contain proposals as to how this target will be achieved and behaviour change will be significant in the achievement of this target, which can only be partly influenced by local authorities. In particular, levels of population increase, economic growth and industry measures to reduce packaging waste are likely to have substantial impacts on waste arisings.

It is inconsistent that waste reduction targets in a "municipal waste management strategy" a key aim of which is to "…reduce the amount of municipal waste generated by the Capital…" (see Section A. above), should only apply to the household waste element of it - why not set targets for

reducing municipal waste? For example waste reduction around food waste can have significant tonnage savings if food outlets and restaurants thought more about the waste they produce.

The Strategy's support for the introduction of national deposit schemes for bottles and cans could help towards achieving this target by removing them from the household waste stream. However, this would also make the achievement of high recycling targets for municipal waste more difficult. If a national deposit scheme is introduced, it may be necessary to revise recycling targets downwards.

3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031.

There is a need to promote and encourage the reuse of bulky items to make it an acceptable form of consumerism. Further, the targets appear to be optimistic and Lewisham's experience of trying to implement bulky reuse services over the years has had limited success despite the desire to reduce waste in Lewisham. There also needs to be a change in the mind set amongst the third sector who seem to see the social benefits, but not necessary that waste is a resource with a value.

There is concern over this target with regards to the recent cuts to LWaRB funding.

On page 75 the second bullet point under Proposal 1.1 refers to the Mayor setting a target to achieve actual levels of re-use rather than capacity for re-use as above.

In addition, much "re-use" occurs before items are discarded and become "waste" (e.g. through the private sale and exchange of second hand goods). As such, "re-use" can be considered an option that sits above the Waste Hierarchy as well as within it. The strategy could propose to do more to promote the re-use of goods before they get discarded as waste (e.g. through promoting private re-sale / giveaway via Ebay, car boot sales, Freecycle etc) even if this is strictly beyond the scope of a waste management strategy.

It should be noted that items collected for "re-use" are not "waste" and that this may affect some of the Mayor's calculations.

4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% by 2031.

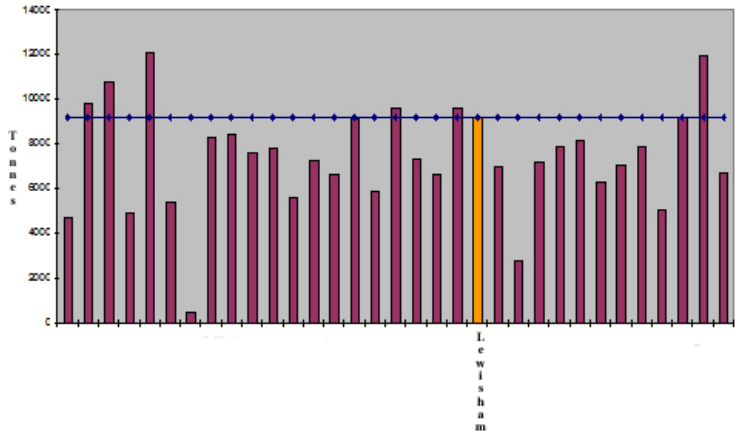
First of all the Mayor needs to recognise that this target is interdependent with the waste reduction target: successful waste reduction measures will impact on the recycling rate, and the collection of additional waste to meet these targets, such as garden waste, will increase overall waste tonnages, thereby affecting waste reduction targets.

The contribution different regions are expected to make towards the achievement of national targets should reflect their local circumstances. In London's case, this should mean a lower than average contribution, reflecting the low level of compostable garden waste in London's household waste stream and the particular difficulties of achieving high capture rates at flatted premises, areas with high levels of transient populations and in households with limited space for storage. However, at Appendix 3 page 2, it states that

> "The Mayor's targets are more ambitious than those set by the Government and reflect regional circumstances, such as the declining landfill capacity accepting London's waste; the need to significantly improve municipal recycling or composting performance - London is the lowest performing region in the UK; and the need to significantly increase the amount of waste managed within London to achieve greater self sufficiency in line with Planning Policy Statement 10."

This seems to miss the point that London is the lowest performing region because of its low level of garden waste arisings and high level of flatted premises. The other two reasons given for the high targets could be alternatively addressed by increasing London's residual waste recovery capacity. Figures 4, 5 and 6 illustrate this point well - London's dry recycling performance is only slightly below average but cannot achieve high composting rates, especially in inner London, due to the low level of garden waste and high number of flats. The recycling column in Table 1 (page 40) should be split into "recycling" and "composting" to highlight this further.

Lewisham has a commitment to waste minimisation demonstrated through the services it does and doesn't provide (i.e. food and free garden waste), and whilst overall waste per household is mid table, authorities that boast high recycling / composting rates also have very high overall waste per household figures. Yet Lewisham is often cited as being a poor performing in terms of recycling rates. However, in looking at the first six months of 2009/10 data for dry recycling shows that Lewisham is ranked 7th best performer of dry recycling collection at the kerbside across London as the graph below illustrates.



Further, the 60% target goes above and beyond National and European targets and its achievability without incurring excessive cost is questionable. As far as Lewisham is concerned, it is unlikely that this would be achievable, given that if Lewisham was to comply with Proposal Two, incineration of food / organics waste is preferable, thereby not contributing to this weight based target.

At Appendix 3, page 2, it is stated that "The Mayor's targets are for London to achieve as a whole, placing no requirement on individual waste authorities to achieve them." This should be stated clearly within the "Policy 4" section of the Strategy, but is not.

The particular contributions the Mayor expects individual boroughs to make towards the achievement of these targets is unclear, but outer London Boroughs collecting large quantities of compostable garden waste and with lower proportions of flatted premises are expected to make bigger contributions. However, it is uncertain as to whether this is achievable, and so the Strategy should make it clear how the MoL intends to ensure that the sum total of borough contributions towards achieving improved recycling rates will ensure that his targets are met.

There is no justification for including anaerobic digestion within these targets as its CO2eq performance is on a par with incineration with EfW. It should be excluded from the calculations, with the targets revised downwards to compensate.

5. The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately:

- **1.2 million tonnes of CO2eq in 2015**
- **1.4 million tonnes of CO2eq in 2020**
- **1.6 million tonnes of CO2eq in 2031**

Objective supported in principal. However, there is significant doubt about how accurately carbon equivalent emissions can be measured using "WRATE" or otherwise and close analysis of the carbon benefits of some initiatives designed to achieve the Mayor's high recycling targets may indicate little if any benefit from them e.g. the separate collection of food waste for recycling.

Whilst the draft strategy provides a current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall, it does not provide a borough level breakdown of this figure. Lewisham has undertaken some WRATE work on various waste management options, but this didn't directly assess the CO2eq impacts of the borough's municipal waste management or the size of reductions likely to be achieved by future changes in how the waste is managed. The Mayor's proposed "ready reckoner" will largely address this (subject to the reliability of the data) but in the meantime it is difficult to assess the contribution Lewisham can make towards the achievement of these targets or the associated financial costs / savings.

At Appendix 4b, it appears that the current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall excludes collection related impacts. The figure should therefore be presented as a figure for "London's municipal waste disposal and treatment activities overall" or be revised upwards to include collection related impacts. It is important that this should be clear in the main Strategy, as most people will not read the Appendices.

6. To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.

This is not a "SMART" target as it is not measurable - how would we recognise the point at which "as much energy as possible" was being extracted? It would be preferable to set a target in terms of e.g. kilo-joules generated or percentage increase from a baseline.

If a target is not set in terms of kilo-joules generated or percentage increase from a baseline, then "…as much energy as possible…" should be more closely defined or replaced with "…as much energy as is reasonably practicable…" or similar.

There is a danger that the Mayor's preference for emerging new technologies over incineration with energy recovery could result in more waste than necessary going to landfill, either because the new technologies fail to deliver as promised or because local authorities are unable to afford them.

The Mayor's commitment to utilising waste heat from EfW processes e.g. through the provision of district heating ring main piping systems (as exist in Paris and Amsterdam) as detailed at pages 129-130 of the Strategy is welcomed. Realistically however, the prospects of this actually being delivered still seem far off, especially given the imminent demise of the LDA and its central government funding.

Policies and Proposals

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling municipal waste

A worthwhile policy, but to inform consumers, implying a communications campaign, has it's drawbacks given the amount of money required for a successful and comprehensive communications programmes. Resources for achieving this (e.g. for Recycle for London and borough level activities) may prove insufficient to produce a behavioural change in awareness levels, especially in the context of the level of financial savings that local authorities must achieve over the next four years.

The Mayor is in a good position to promote take back schemes for WEEE and batteries, which would reduce the amount of that waste stream entering municipal waste streams. Working with companies to make it easier for householders to take advantage of take back schemes under producer responsibility would also be of benefit. It is often 'hidden' on many company websites or information given out.

Further, the Mayor could lobby for minimum standards of electrical equipment and components, which should reduce the need to replace such items as often. There should also be a standard to show whether an item can be easily repaired, reused or recycled allowing consumers to make an informed choice.

Proposal 1.1: Setting waste reduction and re-use targets

Reducing waste should be the core of any waste management strategy. However, it should be noted that waste authorities have a hard task in that they are reliant on the amount of waste that enters the waste stream, the types and weights of waste, and the results of the recession and any subsequent recovery on consumption.

There is also the point to note regarding reuse and measuring it. Local authorities often only count reuse tonnage from organisations they are partners with and much reuse goes on outside the remit of waste authorities, such as on Freecycle and Ebay.

Setting waste reduction targets may affect recycling targets: the approach that Lewisham has taken is not to provide a free garden waste service. This has had the effect of reducing the amount of overall waste collected per household (the ideal), yet has kept the recycling / composting rate low.

Proposal 1.2: Supporting London-wide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling

This proposal is fully supported. However, adequate funding for this needs to be sought, as Recycle for London's available funds may well prove insufficient to provide the level of support necessary to ensure the achievement of related targets and objectives contained in the Strategy. This is especially the case since Recycle for London funding is only available until 2013.

There is concern about the effectiveness of campaigns and the impact on targets as there are a number of variables. Lewisham has invested substantially in terms of communications around recycling over the past two years, with an almost negative effect on the recycling rates. This may be due to the current trends, packaging weighing less etc, but an increase was expected to be seen.

Lewisham has participated in a zero waste place scheme, with good results, including winning a ValPak award for innovation. However, the costs in rolling this out across the borough with the same intensity are substantial. Smaller bins have been distributed, but without the intensity of communications - as such the results have not been the same as the pilot.

Proposal 1.3: Reducing the amount of municipal waste entering the waste stream

Agree with this proposal as it treats waste at the top of the waste hierarchy in terms of reduction. For the strategy, the benefit will be only with those businesses who use the authorities trade and recycling services, rather than all businesses, as outlined in the definition of municipal waste.

In Lewisham's attempt to reduce the amount of municipal waste entering the waste stream, charges are made for those items such as garden and bulky waste. In terms of bulky waste, it is often cited that fly tipping will increase, but Lewisham actually found that with a comprehensive

communications campaign, fly tipping dropped in the months following the introduction of the charge.

Further, it should not be underestimated the level of influence local authorities have in changing behaviour in terms of waste. There is still a link between levels of economic activity and waste generation, and waste reduction measures outside of the local authorities control, e.g. with packaging, encouraging a 'mend' culture and manufacturing products that last will be crucial in achieving such a reduction.

This proposal relates to municipal waste and so is inconsistent with the household waste target, and so there is the question as to why the reduction target doesn't relate to municipal rather than just household waste?

The Mayor's efforts to encourage packaging and product design that reduces waste should seek to engage with and influence marketing departments as these are often the main barrier to the adoption of lighter weight or more recyclable packaging and also commission large quantities of "direct marketing" (unsolicited junkmail).

Further, the Mayor may wish to work with organisation such as the Material KTN and Environmental Sustainability KTN who are keen to find innovative approaches to designing out waste and communicating those messages in an effective way.

Proposal 1.4: Tackling barriers to providing effective reuse services

Proposal supported. There is, however, a significant barrier to increasing the re-use of items that would otherwise become waste as the costs of goods and products are relatively low compared to new products and also against the cost of repair and refurbishment. Tackling this barrier is likely to require national action e.g. increased taxes on virgin materials / new products and / or tax advantages for second hand goods and recycled products.

The reuse campaign also needs to be directed at the Reuse sector itself: the third sector is very good in terms of the social benefits of reuse, but they need to be more waste / resource minded as well. In Lewisham, a bulky reuse service has been established whereby householders have to pay (the same as for bulky waste), and yet the furniture reuse service will still collect items for free should a resident phone directly. The issue with this is that it provides an even greater inequality than the one that already exists: the 'knowledgeable', less deprived people find out and phone for a free collection, and yet people deserving of a free collection end up paying by coming through the council's service level agreement with the third sector.

The attitude generally towards reuse has to change. To a certain extent this is shifting with more people using sites like Ebay and Freecycle, but all this tends to fall outside of the waste strategy directly and will therefore not effect reuse targets.

Policy 2: Setting a CO2eq emission performance standard for municipal waste management activities to reduce their impact on climate change.

The Council supports the idea of looking at waste in carbon terms, but not in the context of needing to achieve carbon based outcomes alongside weight based targets (and the EU Directive is weight based). This will subject London to a more stringent waste management framework than the rest of England.

Further, it should be made clear whether, unlike the recycling targets contained in the strategy, individual boroughs will be expected to comply with this standard. If so, some boroughs are likely to find it much harder to comply with than others according to the proportion of flats they have, the number and size of gardens and whether they have Reuse and Recycling Centres. There is then the required investment needed to implement services to capture high impact materials.

The data behind the Mayor's standards is based on reports from a single consultancy, without peer group review, and includes some significant assumptions. The outcome is that the Mayor's Strategy is a high risk/high cost approach and, with no alternative, the consequence of failure will be a continued reliance on landfill. The old 'presumption against incineration' continues but the charge that EfW (combustion) would 'crowd out recycling' appears to have now morphed into it will 'crowd out renewable energy'.

The EPS appears to be set on the assumption that the Mayor's waste reduction and recycling targets will be met. It appears that each London Authority may be required to meet/exceed the EPS, in which case London as a whole would exceed both the standard and the recycling and waste reduction targets. So whilst it is clear that there is no direct requirement on London's individual waste authorities to meet the Mayor's targets, the requirement to comply with the EPS at an individual authority level may force them to do so anyway, at least if this achievable without incurring excessive cost, which is doubtful.

On p54, Table 2 now excludes the "incineration (generating electricity only)" column that was included in the January 2010 draft. Its inclusion highlighted that this is the most carbon friendly option for organic waste including "garden/plant waste", "wood waste" and possibly "mixed waste". Adding a further column to the table for Incineration as a disposal option (low energy recovery efficiency) and a recovery option as defined by the 2008 Waste Directive could highlight how incineration processes with high energy recovery efficiency might be the best option for other waste streams too e.g. food waste.

With this understanding, the case for Lewisham achieving a high recycling rate and the EPS / carbon floor based on currently disposal routes is highly unlikely. Lewisham was considering the possibility of introducing food waste collections to achieve a higher recycling rate. Having read the draft strategy and spoken to the GLA about this, the most carbon friendly option for food (and other organic waste) disposal is incineration. By taking that element out of SELCHP, would reduce the efficiency of SELCHP itself and Lewisham's ability to meet the standard. Further, the strategy states that "…the scenario that performs best in CO2eq emissions terms should be given preference." (p55).

Further, for a CO2eq performance standard to be useful, the data for different processing options needs to be reliable. The size of the variations in the figures for kg CO2eq per tonne between Table 2 in the Assembly draft and the Public Consultation draft suggest a high degree of uncertainty may exist.

On p53 it states that Table 2 "…shows the potential lifecycle performance of different waste management methods for various waste materials." However, it appears that the figures take no account of the additional collection impacts involved with collecting different material streams separately (e.g. additional vehicle movement, containers and caddy liner related impacts). The Strategy should make this clear. These impacts may have a significant effect on which option is identified as having the lowest lifecycle impacts and excluding them will only encourage solutions with high collection related impacts to be adopted. That could have serious implications for London's air quality and traffic congestion.

Further, incineration is classed as a "recovery" process under the 2008 Waste Directive, and as such SELCHP, and the contribution that tried and tested EfW incineration makes towards achieving a holistic waste management solution is somewhat missing from the strategy. The 2008 Waste Directive gives, at Annex 11, item R1, the energy efficiency standards which make incineration a "recovery" rather than "disposal" option. The Mayor's strategy should reflect this categorisation.

It should be noted that the boroughs will bear the full costs of achieving compliance with the EPS, but a significant proportion of the theoretical income from achieving it will not return to them (e.g. the "monetised CO2 benefits").

Proposal 2.1: The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

"Greatest possible" is open to interpretation and should be more closely defined. The greatest possible CO2eq savings are only achieved once all waste has been eliminated and as more waste is moved up the hierarchy, the marginal cost of moving further waste up the hierarchy is likely to rise, eventually to a point where to do so does not represent a cost-effective environmental gain. "Greatest possible" should perhaps be replaced with "substantial".

Proposal 2.2: Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

It is not understood how the greatest climate change mitigation benefit at least cost would be possible. For many authorities that have yet to implement services to achieve this, capital and revenue costs would need to be identified, which in this economic climate, and with LWaRB's funding reduced, is likely to be hard to achieve.

Proposal 2.3: In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.

Any minimum CO2eq performance standard for energy from residual waste should be set at a level so as to ensure that processes classed as "recovery" under the 2008 Waste Directive are generally able to comply with it.

There is no disagreement with the principle that London's municipal waste, used for energy generation, should have a carbon intensity less than, or equal to, the source of energy generation it displaces. The concern is that the Mayor has decided that it is energy generated by "combined cycle gas turbine (CCGT) plant" which will be displaced. CCGT is very efficient and is assumed to generate electricity at a carbon intensity of 387grammes CO2 per kilowatt hour (CO2/kWh), this compares with a national grid mix of around 517g CO2/kWh. In reality, EfW will displace coal fired power stations (around 40% of the grid mix) which produce over 900g CO2/kWh and will struggle, by a 2015 deadline, to comply with the EU's 'Large combustion plant directive'. A reliance on power from imported gas also leads to concerns on the security of national energy supplies. This bench mark is based solely on this one study which underpins the strategy. The implications are so important that there must be time to evaluate the study and its conclusions if for no other reason than to ensure that there is a very firm basis for the Mayor's reliance on one option which has no alternative. There are organisations that serve London that have the expertise to provide the "challenge" and time must be allowed for such a challenge.

The EPS assumes energy will be recovered from 'low carbon' waste sources (e.g. food, via his preferred but unproven technology mix) coupled with increased recycling of fossil fuel based materials such as plastics and textiles. The Mayor's consultants acknowledge this could lead to a requirement for separate food waste collections, kerbside sorting of recyclables (associated traffic congestion) and, to help balance the costs, fortnightly residual waste collection. The financial costs of meeting the EPS will fall entirely on the boroughs but significant elements of the income will not return to them as a large proportion will be retained by private sector providers, some will simply not materialise at all (no account of the volatile nature of the materials market appears to have been taken and the strategy is dependant on optimistic prices and markets for recyclable materials remaining constant) and notional benefits, such as the 'monetised' value of Greenhouse Gas Emissions, will not translate into cash in borough funds.

The Mayor's advisors have admitted that London boroughs are not currently meeting the EPS, and changes will be required, but no evidence of what this will cost has been provided. Local authorities will not have the resources to provide any waste service that is not based on good economic grounds. There is no data that is currently available that provides evidence that extracting energy from food and green waste is less beneficial in all the circumstances that recycling, yet the Mayors strategy is forcing councils to provide these recycling services on the basis that the carbon saving is significant and therefore there is an overall cost saving. As mentioned above, Lewisham's best option for food waste is incineration.

The consultants report makes it very clear that unless the so called "best practice" is adopted such as AWC and kerb-side sorting then none of its modelling is reliable. Many authorities in London, particularly in Inner London, will not be able to adopt this best practice. The Mayor must consider the reality of London and ensure that landfill is avoided, energy is recovered and recycling is encouraged without London incurring costs it can ill afford at this time.

The Strategy should recognise the contractual arrangements that authorities are tied into, especially with waste disposal facilities and their long operational life spans. The SELCHP EfW incinerator became operation in 1994 and Lewisham has a 30 year contract expiring in 2024. As such, it pre-dates the carbon agenda and it would be unreasonable to expect Lewisham to "…have steps in place to meet (the EPS) in the near future." In practice it is likely that this could only be achieved at excessive cost. The requirement to comply with CO2eq performance standard for energy from residual waste should be qualified to exclude facilities which have already been procured and to which disposal authorities are contractually bound for years.

Finally, energy from waste cannot be assumed to be replacing other energy sources - it may be additional to existing capacity.

Proposal 2.4: The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

This proposal is supported although the more simplified any tool is, the less accurate it is likely to be. And any tool can only be as good as the data behind it, but the range of different CO2eq performance figures for different processes across different data sources and the regularity with which the data gets updated and changed casts significant doubt over how reliable any such tool could be at any given time.

Proposal 2.5: The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.
It should be noted that by failing to take full account of collection related impacts (e.g. in Table 2) the Mayor may inadvertently encourage adverse impacts on London's air quality by encouraging collection intensive solutions.

Proposal 2.6: The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

Proposal supported.

Policy 3: Capturing the economic benefits of waste management.

This policy is supported, especially if it assists local authorities in receiving some of the financial benefits gained from waste, which is in effect a resource that private companies want, in a transparent way. However, the figures cited in the strategy should be removed. The Mayor is unable to influence in the global market, and like any commodity it is traded on the open market, which is therefore subject to fluctuations in price depending on the markets available.

Proposal 3.1: Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

This may be useful, although the term 'implement efficiencies' implies that the Mayor would expect the authority to implement efficiencies identified. However, the risk lies with the local authority, not the Mayor, and if they are true efficiencies of benefit to that authority, then they will be implemented regardless.

Proposal 3.2: Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal supported, but should add at the end '…waste collection authorities can draw down services if suitable / relevant' or words to that effect.

Proposal 3.3: Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal supported, but again would add that authorities should not be tied to use contracts. Also 'disposal' should be added before 'authorities'.

Proposal 3.4: Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal supported. However, LWaRB's available funds are limited compared to the scale of the Mayor's ambitions.

Proposal 3.5: Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

Proposal fully supported, although in looking at building and running a waste transfer station in Lewisham, this may come a little late.

Policy 4: Achieving high recycling or composting rates resulting in the greatest environmental and financial benefits.

This is how the policy is given in the Executive Summary, but the main body of the strategy (at page 113) excludes "resulting in the greatest environmental and financial benefits".

For the most part, it is unlikely that any single approach would result in both the greatest environmental benefits and the greatest financial benefits - there will often be a trade-off between the two. As it stands, it is unclear whether this policy supports measures that achieve environmental benefits through recycling at a net financial cost. This policy would therefore be clearer if it were amended to "Achieving high recycling or composting rates resulting in the greatest environmental benefits at acceptable financial cost."

There is a significant risk that forcing waste collection authorities to chase high recycling targets would result in greatly increased collection costs for little or no environmental benefit. Lewisham doesn't landfill its organic waste, but it's separate collection would be costly. A 10,000 household pilot was investigated to run for six months with a cost in excess of £0.5m. If this were to be rolled out costs would be much higher, especially year one for container supply, distribution and communications. Further, the gate fee would have to be more favourable than the current gate fee at SELCHP to make it economically viable.

Proposal 4.1: The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031.

On page 114 it states that achieving 60% recycling could save "…about £60m in waste collection and landfill disposal costs each year." However, it would only reduce landfill disposal costs in boroughs relying on that method of residual waste disposal. In Lewisham's case, the increased collection cost associated with achieving this target would be likely to significantly exceed any related net disposal saving.

It is difficult to see how the proposed route from approx. 17% to 60% recycling could be applied to Lewisham as:

- The Reuse and Recycling Centre is small, with a licenced capacity of a little over 6,000 tonnes;
- Doorstep recycling tonnages have levelled off and actually started to decline in recent years;
- Whilst business recycling is promoted, out of 2,500 trade customers, only 200 have taken up trade recycling even though it's 30% cheaper than a trade contract;
- Lewisham's waste policy is driven by waste prevention as far as possible, and so have no intentions of implementing schemes such as free garden waste as this would drive up overall waste production, contradicting the waste reduction / reuse target;
- Given the EPS and the need for SELCHP EfW to be as efficient as possible, the best route for organics, in particular food waste, would be incineration, and so to meet those standards and given the cost of implementation, it is unlikely that Lewisham will introduce a food waste collection scheme;
- Other measures have been and are being looked at to help drive up recycling such as street cleansing arisings and mattress recycling, as well as parks green waste being dealt with at source;

Factors beyond the authorities control also have to be taken into account:

- Inner city demographics of Lewisham provide additional challenges in terms of sustainable waste management options including differing housing stocks, lack of and size of gardens and a higher proportion of hard to engage groups with transient populations;
- Rising public expectations and changing behaviour towards sustainable waste management options, including having limited influence on supply side factors of consumption and packaging design.
- Further, recycling rates are only as good as the people who use the services supplied, and for those that do use them then the quality of recyclate put out needs to be high;
- Improvements in packaging technologies have a negative impact on recycling rates, including lighter weight glass bottles and cans being replaced by tetrapaks, which currently aren't collected at the doorstep and the reduction in free newspapers means less recyclable material available, thereby potentially affecting weight based targets.

The text below Proposal 4.1 on page 117 is confusing - Where recycling and composting delivers the best economic and environmental outcomes, surely local authorities will be inclined to consider this before energy generation even in the absence of the Mayor setting high recycling targets?

And wouldn't it make more sense to say that, where energy generation and recycling/composting have similar performance in environmental terms, cost should be the deciding factor? And if cost related considerations can over-ride the Mayor's Waste Hierarchy, this should be clearly stated in Chapter 4 as is the ability for CO2eq considerations to over-ride it.

Proposal 4.2: The Mayor, through the London Waste and Recycling Board's best-practice coordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

This proposal is supported. However, London's waste collection authorities should remain free to determine the design of the recycling services that they consider to be most appropriate for their borough.

On page 117 it suggests that boroughs with a high proportion of flats should consider investing in residual waste treatment facilities, including "dirty MRFs". Whilst this may be a valid statement, if there is a question mark over the long term viability of co-mingled collections due to recyclate quality issues, there must surely be a bigger question mark over the quality of recyclate from dirty MRFs. For example, Lewisham has had huge issues over quality at the MRF it currently uses, despite a huge communications programme. In 2009-10 the MRF sent 1,780 tonnes to SELCHP at a cost to the Council of £109,470. Therefore, it might be good to qualify this statement with something like "subject to recyclate quality issues".

On page 118 it is noted that "…it is difficult to present an accurate assessment of London borough collection costs…". It appears that the Strategy consistently underestimates the likely additional collection cost implications of achieving very high recycling rates.

Also on page 118, it states that "…the Mayor expects boroughs to first focus on collecting those materials that achieve the greatest CO2eq savings by being diverted from landfill or energy generation. These include organic waste…". However, WRATE analysis suggests that this is not the case locally for food waste, which accounts for the majority of organic waste in the residual municipal waste stream.

Proposal 4.3: The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Lewisham collects dry recyclables from businesses, yet despite the promotion only 200 businesses have taken up the service at a reduced cost of 30%. Small businesses, do not see waste / recycling as a priority and few have space for additional containers.

Proposal 4.4: The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Fully support this proposal, but spread across London, this equates to around £150k per borough and is unlikely to prove sufficient to achieve the four fold increase in flats recycling by 2031 or the 3.5 fold increase by 2020 envisaged in Table 8.

Proposal 4.5: The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Support for this proposal.

Proposal: 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Incentive schemes for recycling in the UK are still in their infancy. Their cost effectiveness along with the extent of the role they can potentially play in achieving higher rates of recycling is still unclear, especially in the context of flats with communal waste storage and services already achieving high capture rates. It is also unclear how much of the increase in recycling observed with such schemes can be attributed to the existence of the incentive and how much actually relates to the high level of publicity promoting the incentive scheme.

Lewisham has investigated using RecycleBank, but have decided not to go ahead with such an incentive scheme for a number of reasons. The first was the cost to the authority, which wasn't justified given the return in recycling rate, especially as there is no comparable data to support such a scheme in a partly deprived inner city area. Secondly, the contract tied Lewisham into the scheme for a number of years, and thirdly, the scheme seems to promote consumerism and is therefore contradictory to the targets around waste reduction.

Subsidies for residents to purchase home composting containers, "Green Cones" or wormeries may well be the most effective form of incentive and can help to reduce the quantity of waste entering the household and municipal waste streams. Lewisham actively promotes home composting and gave away 1,700 home composters between April and September.

Proposal: 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Whilst limited networks of on-the-go recycling facilities for newspapers and magazines can be provided at acceptable cost, more intensive schemes catering for packaging containers tend to have very high collection costs as containers must be small to fit on-street and the packaging is low density, so the containers must be emptied very regularly but produce low tonnage per collection. They also tend to suffer from very high levels of contamination: only 5% of waste collected was suitable for recycling in an 'on-the-go' recycling scheme piloted in Lewisham over three months. All the other bags were significantly contaminated and were sent for incineration.

Proposal 4.8: The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal supported. The wording could perhaps be improved e.g. The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection and recycling service information and performance data across all London boroughs.

Proposal 4.9: The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

A fully supported proposal. These schemes work in other cities in countries the world over and should be implemented in the UK. As such there is strong evidence that this is the approach that would achieve the highest possible recycling rates for this material. However, diverting this recyclable material from the household waste stream would make the achievement of high municipal waste recycling targets harder, so if a deposit scheme is introduced the Mayor should consider an appropriate associated reduction to his targets.

By increasing the purchase cost of soft drinks and bottled water, consumption of these products could be expected to fall, producing an associated environmental benefit plus a health benefit in the case of sugared soft drink consumption.

Policy 5: Catalysing waste infrastructure, particularly low carbon technologies

A commendable policy, but accurately forecasting future needs in terms of both tonnage capacities and the appropriate split of treatment technologies is inherently difficult. Further, LWaRB's remaining funds for catalysing waste infrastructure are limited.

Proposal 5.1: The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure.

Support the proposal.

Proposal 5.2: The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies.

Due to the high costs and environmental impacts of separately collecting domestic food waste, the Food to Fuel Alliance backed exemplar projects mentioned on p136 would probably achieve more CO2eq benefits if fed with waste from London's commercial food outlets.

Proposal 5.3: The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan.

Proposal supported as far as possible given additional pressures London has. In Lewisham most waste stays within the borough, with the exception of dry recyclables which are processed in the neighbouring borough. However, where authorities have facilities just outside the London boundaries then these should be used, especially as there would be the added benefit of less pollution from shorter waste miles. It should be noted that London also has to deal with waste, not only from its residents, but also visitors, tourists and commuters, demonstrating that not all of London's waste is from people who live and work in London.

Proposal 5. 4: The Mayor through TfL, will encourage the movement of waste via sustainable modes of transport.

Proposal supported.

Policy 6: Achieving a high level of street cleanliness

Restricting this policy to "street cleanliness" excludes other public open places such as parks, open housing estate land and commercially managed open public areas. References to "street cleanliness" should be replaced with "cleanliness of public open places", which would be in line with current NI195 monitoring.

There is no target for this policy, and so there is the uncertainty as to how the Mayor's vision of a consistently high standard of street cleanliness would be measured. Further, many authorities are facing cuts in their street cleansing budgets, and as a result it is likely that in some areas performance may dip.

The proposals backing this policy don't go far enough and are not sufficiently strong enough to ensure that this policy results in a significant improvement to the cleanliness of London's streets or other public open places.

Many authorities already do a lot of work around behavioural change, (Lewisham has four campaigns a year targeting Food on the Go, Chewing Gum, Cigarette litter and Dog Fouling), yet maybe an overall London wide campaign could be delivered, along the lines of Recycle for London to raise the issue of littering to a regional level. Boroughs could then participate in these at a local level, through education and enforcement activities.

Proposal 6.1: Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Fully support the use of Love Clean Streets to deliver this proposal, which is already being used in the public domain. All London authorities have had reports posted via LCS over the past three months and the majority of London's authorities are actively using LCS, or at least positively responding to reports. Further, the costs of dealing with enquiries / complaints are more cost effective using LCS over other forms of contact (£5.11 for a call to a contact centre against £1.50 for LCS). In addition, Lewisham has seen a 15% reduction in casework since 2009 (until Dec 2010) and if calculated since 2008 this totals a 21% reduction in casework.

LCS should be seen as a tool for authorities to use that will enable an issue to be dealt with prior to a member of public seeing the issue. Further, LCS can help with the LEQ monitoring, as monitoring officers can grade, take an image, send off, and the problem be dealt with in a matter of hours.

Proposals 6.2: Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Fully support this proposal.

Proposal 6.3: Encourage boroughs to recycle or compost their street cleaning waste where practicable.

In principle this policy is supported, although it is not understood what is meant by 'encourage'. However, due to budget cuts, the street litter recycling scheme in Lewisham has been cut, although alternatives are being considered, should they be economically viable.

Proposal 6.4: Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

On page 144 it is suggested that the increased provision of "on-the-go" recycling bins will make littering "increasingly unacceptable". However, they are unlikely to be any more effective in preventing litter than litter bins, the provision of which is already widespread. Lewisham conducted a trial in Lewisham town centre of street litter recycling bins, and over three months only 5% of the waste collected was recyclable. The rest had to be sent to SELCHP. Whilst it sends out the right message, people still didn't use the bins appropriately (we were happy they used the bins at all!!), and there were wasted resources, in terms of staff time and cost, in delivering such a scheme. This style of recycling on the go may work in some locations better than others and by concentrating on a few targeted materials.

A more fruitful solution would be deposit and return schemes, whereby people have to think about how the item is disposed, whereby the resultant recyclate would be of a high quality. Unfortunately, it will be the economic drivers that would make this a success, rather than the right thing to do environmentally. Returning empty beverage containers for recycling and reuse has become a way of life for South Australians, resulting in the state being known as the cleanest and tidiest in Australia. This is because container deposit legislation (CDL) now incorporated into the *Environment Protection Act 1993* enjoys overwhelming public and community support. The success of CDL has resulted in South Australia achieving recovery and reuse rates for beverage containers covered by the legislation that are above the national average. The associated reduction in litter has resulted in a cleaner environment, providing South Australia with a 'point of difference

The primary responsibility for dealing with waste from London's events normally lies with the event organisers, who often request recycling facilities. Again, these are often contaminated and end up being incinerated, or many staff hours are spent sorting through waste to ensure there is no contamination before it goes to the MRF.

Proposal 6.5: Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, in advance of the Olympic and Paralympic Games.

Proposal fully supported. However, this should be incorporated into one campaign, the most likely one would be through Capital Clean Up. All the above organisations sit on the Capital Clean Up committee and the GLA could provide much needed support to ensure that the work undertaken by local authorities and their volunteers over the past four years isn't undermined by a one off clean up. This sort of activity should be encouraged on an on-going basis to ensure sustainability of a clean London and to engender behaviour change in the long term.

To ensure that London's streets are as clean as possible over the Olympic period the Mayor should seek to secure Olympic funds to enable the boroughs to provide enhanced cleansing services in the run up to and during that time.

Proposal 6.6: Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Policy supported, but maybe it should be to ban plastic bags altogether, rather than develop a road map towards a plastic bag free London. Plastic bags not only cause litter and are unsightly, they are environmentally hazardous causing problems for wildlife not only locally, but globally too. Italy has recently taken a lead in this, and sometimes people need to be nudged in the right direction for behaviour change to happen. This might be an area that will then encourage people to think about other forms of waste, such as purchasing water, when there is water in the tap that can be put in reusable bottles. Lewisham has recently run a campaign in European Waste Prevention Week around plastic water bottles and have handed out free reusable bottles to residents. It was alarming to hear that many people were caught up by the advertising of bottled water and actually thought that this was because they can't drink tap water!

Proposal 6.7: Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting non-stick and degradable gum in London.

Proposal supported, but this is a national problem which will require a national solution. This debate and development has been on-going for a number of years, with no real impact and a different approach is required:

Firstly, there has to be an element of producer / polluter pays as there is with other waste. Local authorities spend thousands of pounds, if not running into millions, clearing up gum, and the manufactures should pay for some if not all of the cleansing costs.

Secondly, would be to force the adoption of improved gum packaging, incorporating wraps and a pouch for discarded gum, as produced locally by Peppersmith, who attended the Mayor's Gum Gala. At least if gum was still dropped the cleaning up of it would be easier and the staining would significantly reduce. Lewisham has undertaken campaigns using 'wrap its', which saw at the end of the campaign a 38% decrease in gum dropped, a 49% decrease at the one month post campaign monitoring period and a 44% decrease at the two month post campaign monitoring period.

Proposal 6.8: Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal supported, but this again is a national problem which will require a national solution. As with gum, there should be an element of producer / polluter pays. Making it mandatory for tobacco

manufacturers/retailers to supply butt pouches free of charge to smokers at the point of sale might be an effective way forward. Again some of the costs for clearing up cigarette butts should be passed on to local authorities. This is especially pertinent given the current economic climate.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum litter for London in the years leading up to 2012.

Proposal supported, but the effectiveness and sustainability of such campaigns could be questionable if it doesn't lead to sustained behaviour change.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

Proposal supported. The Mayor may wish to investigate the feasibility of providing "exchange" containers on underground trains or stations for passengers to place newspapers and/or books that they have finished with in for others to read.

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Dear Mr Richmond,

Consultation Response – The Mayor's Municipal Waste Management Strategy Public Consultation Draft

We welcome your decision to update the Municipal Waste Management Strategy (MWMS) for London and would like to thank you for inviting comments on this strategy.

The London Borough of Suttons (Sutton) is a unitary authority and therefore responsible for the collection and disposal of municipal waste. We are committed to managing our waste sustainably.

I am pleased to present our consultation response below.

Policy One: Preventing Waste and Informing People of its Value

Waste Reduction

Sutton supports the prioritisation of waste management solutions according to the waste hierarchy. Therefore, we are pleased that the first policy within the Mayor's MWMS is about preventing waste. However, we do not feel that the Mayor has gone far enough to express that waste reduction is the most beneficial policy for reducing the both the economic and environmental costs of waste management in London.

Through the adoption of our One Planet Action Plan we are already committed to the ambitious target of helping individuals, communities and businesses achieve zero waste. The term "zero waste" is misleading and therefore we suggest that the Mayor clearly defines what they mean by this term before embedding it within the MWMS.

Strategic Director - Environment & Leisure
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EMAS VERIFIED ENVIRONMENTAL MANAGEMENT
INVESTOR IN PEOPLE
Beacon Authority 2006-2007 Waste and Recycling 2008-2009 Better Public Places

Whilst setting a waste reduction target is admirable as it demonstrates the commitment of the Mayor to reducing waste within the capital we believe achieving such a target is largely outside our control. There are so many influences on waste reduction that are beyond the remit of local authorities, including:

- The state of the national economy;
- Societal trends i.e. fast fashion;
- Amount of packaging;
- Product design;
- Negative publicity surrounding waste minimisation initiatives; and,
- Stimulating a market for reusable items.

We are concerned about how realistic the target given that the baseline was taken during a recession and that there has not been any evidence to suggest that the link between waste arisings and wealth has been broken. Therefore, we would like the Mayor to revisit this target.

We are supportive of the Mayors proposal's to promote waste reduction and reuse through Recycle for London. We appreciate the amount of consultation that Recycle for London have conducted with the London boroughs and believe that it is important that they continue to do this so that our local campaigns can complement and build of regional waste reduction campaigns.

It is vital that businesses play their role in reducing waste and we are pleased that the Mayor has proposed to work with businesses in the capital to improve resource efficiency. We would also support the Mayor with any lobbying of national government and businesses for taxation of unsustainable products, increased product lifespan, longer guarantees, standardisation of components, behaviour change, and reducing packaging. Local authorities absorb the full costs of collecting and disposing of unwanted products that could have been produced in a more sustainable manner. It is not morally right that tax payers have to pay for waste that is caused by private companies. It also does not fit with the polluter pays principal.

<u>Reuse</u>

The main barrier to the development of a successful reuse network within London is funding. We therefore welcome LWARB's investment in the delivery of reuse infrastructure through LCRN. Some of this investment should be used to support third sector organisations in becoming self funded to ensure that the network is sustainable over the duration of the Mayor's MWMS.

Key considerations for the development of a London-wide reuse network include:

- Identifying an accurate measurement of the amount of reuse;

- Increasing the amount of infrastructure for reuse despite the high demand and price of land in London;
- Gaining good quality items;
- Providing training for reuse and repair industry;
- Stimulating a market for reusable items;
- Challenging the consumers perception about “second hand” items;
- Lobbying government and large companies to ensure that products are designed for reuse and repair;
- Financial implications of the reuse network to local authorities during a time when they are facing reductions in their budgets; and,
- Providing a one-stop shop for all of London’s reuse activities.

Policy Two: Reducing the Climate Change Impact of the Management of London’s Municipal Waste

Climate Change Focus

Sutton agrees that we need to focus on delivering greenhouse gas savings through sustainable waste management activities and will work with the Mayor to do this. Although, it is important to remember that a climate based approach relies on accurate tonnage data.

Emissions Performance Standard (EPS)

Whilst we support the rational behind setting a CO_2 EPS, we recommend that the Mayor uses it to guide local authorities on how they can reduce the carbon footprint of their waste management services rather than as a requirement. The Mayor needs to acknowledge that before making service decisions, local authorities have to consider other factors such as value for money and practicality of implementation. Local authorities in consultation with their stakeholders are best placed to make decisions where there is a trade-off between the financial cost and greenhouse gas saving.

We already spend a large amount of time collecting, collating, monitoring and reviewing waste data as required by central government. During a time when local authority resources are being reduced it does not make any sense to introduce another administrative burden. We would suggest that the potential administrative burden of the greenhouse gas performance toolkit is considered.

We feel that by prioritising according to the waste hierarchy the Mayor will already be encouraging local authorities to reduce the carbon footprint of their waste service. Therefore, we do not believe it is necessary to set the EPS.

A technical understanding is required to understand the modelling behind the EPS. It is currently a work in progress and the Mayor has not stated any intent to consult further on the EPS when it is complete. We think that it is important that if the Mayor decides to introduce this

standard that further consultation takes place between the GLA and London boroughs.

Removing the requirement to meet the EPS will not prevent us from seeking to reduce the carbon emissions of our service.

Carbon Floor

Again, we recommend that the Mayor uses the carbon floor to guide local authorities and waste management companies on how they can reduce the carbon footprint of energy recovery facilities in London instead of making it a requirement of the MWMS.

We have some concerns about the indicative requirements including the high level of efficiency that has been proposed for incineration with electricity generation. Even the most modern incinerators in the capital do not expect to reach an efficiency of 28%. There is also a trade off between the efficiency of the facility and the cost. Any cost to the contractor of an energy recovery facility will be passed to the local authority through the gate fee.

The amount of biomass required within the feedstock of energy recovery facilities to enable the carbon floor to be achieved would disincentive local authorities from collecting materials like food waste for anaerobic digestion. This is inconsistent with the Mayors proposed high recycling rates and encouragement for more anaerobic digestion.

Policy Three: Capturing the Economic Benefits of Municipal Waste Management

We are concerned that this policy implies that the economic benefits of waste exceed the costs of waste management. Whilst we agree that it is important that economic benefits are maximised through the sales of recyclables and electricity we do not believe that managing waste will become cost neutral during the life of the MWMS.

Establishing Joint Procurement Contracts

Sutton are already conducting investigations into further joint procurement opportunities in response budget reductions. There are a number of factors that will affect the outcome of these investigations e.g. contract lifespan. We cannot see any benefits of further investigation by the Mayor.

We have several concerns around the proposal to establish a joint procurement contract framework for London boroughs including:

- The potential restriction to individual borough's flexibility in opting for a contract that suits their local circumstances;
- Ability of local authorities to get out of long term contracts;

- The diversity of London's boroughs, particularly between the inner and outer boroughs;
- Timescales of existing contracts; and,
- Inconsistency with national policy on localism.

The key considerations in establishing joint procurement contracts for waste authorities include:

- Economies of scale;
- Attractiveness to the market;
- Shared objectives of partners;
- Political cooperation;
- The management of risk;
- Budget commitment;
- Strong governance; and,
- Officer expertise.

A separate consultation would need to be held with London borough's about waste procurement contract frameworks.

Model Municipal Waste Contracts

London boroughs are already good at sharing information about how to develop contracts. We support the development of model contracts for specific services e.g. bulky waste. Having a model contract could save time and therefore costs during procurement. However, it is vital that we are given the flexibility to choose whether a model contract would be of use during a specific procurement.

Local Authority Owned Facilities

We think that there may be some value for local authorities to build and operate small scale infrastructure e.g. biodiesel production facility. But we believe the waste industry is better placed to develop large scale infrastructure like energy recovery facilities. Barriers for local authority ownership include the ability to attract funders and the risks involved.

Financial support would be essential to develop local authority ownership.

Policy Four: Achieving High Municipal Recycling and Composting Rates

Recycling Targets

In principal Sutton welcomes your proposal to achieve high rates of municipal waste recycling and composting. Under the South London Waste Partnership Joint Waste Management Strategy, we are already committed to achieving household recycling rates of recycling rates of 45% of household waste by 2015 and 50% by 2020, in accordance with the National Waste Strategy. We recognise that the Mayor's recycling

targets must be quantitative and something we can aspire to but we are concerned that the proposed recycling targets are too high.

There is a conflict between the Mayor's waste reduction targets and the municipal recycling targets that does not appear to have been acknowledged in the MWMS. Waste reduction achievements may reduce the amount of recyclable material available and the opportunity to meet recycling targets. For example, the amount of paper available for recycling in London has reduced with the decline of free newspapers. Therefore, we recommend that the Mayor reviews the recycling targets.

Other barriers to meeting high recycling targets include:

- Reductions in local authority budgets and consequently our ability to increase the range of recyclable materials that we collect;
- The large proportion of flats, which generally have lower recycling rates than low rise properties;
- Fewer gardens and therefore lower quantity of garden waste available for recycling in London in comparison to other counties; and,
- High diversity and transiency of London's population.

In contrast to the European Union and national government, the Mayor has set municipal recycling targets rather than household recycling targets. Having a municipal recycling target supports activities that we have taken to increase the diversion of non-household waste streams like waste from street litter bins, street sweepings, and trade waste from landfill. However, recycling and composting of these waste streams is less developed than recycling and composting of household collected waste. We think that it will require a lot of investment and research to recycle non-household waste and are therefore concerned that the lead in time to the first target is not long enough. It does equate to an increase of approximately 17% in recycling from 2009/10 levels by 2015.

Other Recycling Services

We agree that separate food waste collection services, flats recycling, "on the go" recycling and business recycling can contribute to increased recycling rates. The main barrier to the development of these services is the cost and resources involved. We therefore support the recent investment into flats infrastructure and local communication campaigns. We would like to be consulted on the proposals for this investment. This investment should be expanded to other recycling collection infrastructure e.g. containers, vehicles to support London boroughs that need to expand their recycling collections to achieve higher recycling rates and increase diversion from landfill.

The Mayor also needs to acknowledge that the services listed above are not suitable or value for money in all areas of London, particularly where space is limited.

Incentive Schemes

Having considered implementing a recycling incentive scheme we have some concerns about the financial viability and practicalities of these schemes, including:

- Installing weighing technology;
- The reliability and accuracy of the technologies used;
- Rewarding people for recycling working against driving waste prevention;
- Reducing our ability to encourage individuals to take responsibility for their own waste;
- The types of reward offered;
- Negative publicity associated with chipping bins;
- Uncertainty about whether increases in recycling will occur in areas that are already performing well; and,
- The limited choice of incentive schemes.

Mayor's Role

We believe the Mayor's role in improving recycling across London should include:

- Providing financial support for recycling communications and collection infrastructure e.g. LWARB's flats recycling fund, Recycle for London;
- Supporting the development of reprocessing facilities; and,
- Raising awareness of business responsibilities and promoting good practise with authorities that have put arrangements in place with local businesses.

Policy Five: Catalysing Municipal Waste Management Infrastructure in London

Investment in new infrastructure

Ultimately our ability to reduce our reliance on landfill is down to investment in waste infrastructure. Therefore, we welcome the proposal to invest in new waste infrastructure.

Investment in low carbon technologies

We support investment in low carbon technologies for London's municipal waste. It is important that the Mayor remains technology neutral. We believe that London borough's and the waste industry are

best placed to make decisions about the infrastructure required to meet local needs.

The Mayor's new 6 step waste hierarchy concerns us in terms of the distinction it makes between recovery technologies that harness heat and those that do not. We do not think there is any more need to separate recovery technologies within the waste hierarchy than to separate closed loop recycling from open loop recycling. It is also a deviation from the revised Waste Framework Directive. In reality, where financially viable the waste industry will be keen to harness waste heat as it will provide them with an additional income. Therefore, we do not feel there is a real need for the additional layer within the waste hierarchy. Instead, the Mayor should encourage Combined Heat and Power-enabled plants by publicising his plans for decentralised energy investment plans.

The barriers to procuring a residual waste technology, which is able to deliver Combined Heat and Power (CHP) include cost, proximity of potential waste heat users to available land, retrofitting buildings for CHP use, and, infrastructure requirements. We think that the Mayor could help us to capture the benefits of CHP by lobbying Central Government for financial backing and planning support.

The Mayor will also need to consider value for money in terms of the reduction in carbon dioxide equivalent before retrofitting London's existing energy from waste facilities.

Self Sufficiency

Sutton is concerned that the Mayor has taken a narrow approach to the self sufficiency principal. There are many barriers to the delivery of a waste sector that is capable of managing the bulk of its municipal waste within London including:

- Public opposition to waste facilities due to lack of understanding; i.e. NIMBYism;
- The value of land in London is higher than in other areas of the country;
- Competing pressures on land in London,
- Planning constraints;
- Existing land users;
- Political opposition and political positioning;
- Withdrawal of PFI credits;
- Transporting waste from south London to north London can be less sustainable and more costly than transporting waste to another county; and,
- Lack of joint working between local authorities.

We recommend that the Mayor introduces a more flexible approach, which would not restrict London boroughs from exporting waste outside

the capital when it is environmentally and economically beneficial to do so. We would also suggest that LWARB funding should also be used to fund waste infrastructure within other counties if facilities can demonstrate that a significant amount of their capacity will be used by London boroughs.

Sustainable Transport

We welcome the Mayor's proposals for the promotion of sustainable transport for the movement of waste.

Policy Six: Achieving a High Level of Street Cleanliness

Sutton supports the Mayor's ambition to achieve high levels of street cleanliness. The role set within the MWMS for the Mayor with regards to street cleanliness is appropriate. We particularly welcome the Mayor's proposal to lead on London-wide behavioural change campaigns and to work with manufacturers to reduce litter. Other actions the Mayor should take include:

- Raising awareness of the economic cost, environmental damage and impact on fear of crime that is caused by flytipping and litter;
- Working with train companies to reduce littering in the areas surrounding train stations in London;
- Showcasing local authorities that make a positive impact on the level of cleanliness of London's streets; and,
- Influencing private investment in litter and "on the go" recycling bins through sponsorship opportunities.

The high levels of street cleanliness the Mayor should be considering:

- The diversity of London's borough's;
- How to engage with tourists;
- The role of the big society e.g. the rule that the community have to keep their local area clean; and,
- Local authority budget reductions, which may lead to a decrease in the frequency of street cleansing.

General

There are a number of inconsistencies within the Mayor's policies that need to be addressed before the MWMS is finalised. For example, the conflict between ambitious waste reduction targets and equally challenging recycling targets.

Since the draft MWMS was published central government has announced the withdrawal of PFI credits to the North London Waste Authority and the South London Waste Partnership, the end of National Indicators and the 2009/10 municipal waste statistics. The MWMS should be updated to reflect these changes.

We hope that this consultation response is useful. If you have any queries on this response or if we can be of further assistance then please do not hesitate to contact us on the contact details given above.

Yours sincerely



Matt Clubb
Head of Waste Management and Fleet Services

Comments on the Mayor of London's Draft (revised) Municipal Waste Management Strategy (Public consultation draft)

General comments

- The consultation periods for the Mayor's Energy and Waste strategies should be extended to allow respondents to properly reflect the outcome of current Government consultations in these areas. Until these consultations are completed and the results assessed and put forward into a new national strategy or at least a draft then the consultation on the Mayor's strategy is at best premature.

A. The Mayor's vision for London's municipal waste

"Ultimately, the Mayor wants London to become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

The Mayor's vision is built upon his waste hierarchy, applied from the top down. The Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it."

Comments:

- A commendable vision, however:
- The Mayor's Waste Hierarchy on p11 differs from that in Article 2 of the 2008 Waste Directive. It would be preferable and less confusing if the same hierarchy was used.
- Whilst the above vision states that the *"…Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it*", the draft Strategy only supports movement up the hierarchy where this is associated specifically with a reduction in CO2eq emissions, and does so regardless of whether this also achieves cost savings.

The following objectives and targets support the Mayor's vision:

B. Objectives

1) Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

Comments:

- The GLA is in a good position to deliver this commendable objective via the "Recycle for London" (RfL) campaign, with funds awarded by LWaRB. Boroughs can also bid for RfL funds to increase participation in local services. However, LWaRB now only has £22.9m of its original £73.4m pot left- not much to deliver this objective across London.

2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.

Comments:

- A commendable objective.
- There are difficulties with measuring the carbon impacts of London's municipal waste and having a high level of confidence in the data. In particular a) there are substantial differences in the Co2eq figures for different disposal / recovery / recycling processes between different sources of data and b) collection related impacts (vehicles, containers etc) are significant and should not be ignored.

3. Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.

Comments:

- A commendable objective. However:
- The Mayor should not ignore the additional collection costs associated with achieving high recycling rates which are increasingly likely to exceed the economic

value of diverting additional materials from waste disposal as higher rates are reached. The strategy appears to count economic benefits of high recycling rates rather more thoroughly than the costs involved in achieving them. And whilst the costs will be borne by London's waste authorities, not all the economic benefits will flow back to them.

4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

Comments:

- This objective should be secondary to objective 2 above- if the impact of London's municipal waste management on our environment and its carbon footprint can be reduced by managing parts of it outside London's boundary (including transport related impacts), there is little reason not to do so. In particular, a substantial proportion of the waste collected for recycling is likely to be managed outside London's boundary for the foreseeable future.

C. Targets

1. To achieve zero municipal waste direct to landfill by 2025.

Comments:

- A commendable target which Wandsworth expects to comply with from early 2011 onwards.

2. To reduce the amount of household waste produced from 970kg per household in 2008/09 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household.

Comments:

- Reducing the amount of household waste is a commendable aim and it is appropriate to set a target for this. However, Wandsworth households only produced 748kg/household during 2009/10, so the target could be significantly lower in the Wandsworth context. This is probably the lowest level of household waste generation

of any London borough which does not co-collect household and commercial waste (those that do co-collect have to estimate their actual household waste arisings).

- The Strategy does not contain proposals sufficient to ensure that a 20% reduction per household will be achieved.
- The Strategy should recognise the limited impact London's waste authorities can have on influencing the quantities of household waste requiring collection. In particular, levels of economic growth and industry measures to reduce packaging waste are likely to have substantial impacts on waste arisings.
- It is inconsistent that waste reduction targets in a "municipal waste management strategy" should only apply to the household waste element of it- Why not set targets for reducing municipal waste?
- The Strategy's support for the introduction of national deposit schemes for bottles and cans could help towards achieving this target by removing them from the household waste stream. However, this would also make the achievement of high recycling targets for municipal waste more difficult. If a national deposit scheme is introduced, it may be necessary to revise recycling targets downwards.
- See also comments on proposal 1.3 below.

3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031.

Comments:

- A commendable target which WRWA's Re-use and refurbishment centre for furniture and white goods, now scheduled to open in April 2011, will make a significant contribution towards. As a result of this, Wandsworth households will benefit from the option of re-use collections for bulky waste, charged at the same price as the Council's existing bulky waste collection service.
- However, it is not clear why the target set is to provide capacity rather than to actually utilise the capacity.
- The capacity tonnage targets appear over-optimistic, particularly in light of recent cuts to LWaRB funding.
- On page 75 the second bullet point under Proposal 1.1 refers to the Mayor setting a target to achieve actual levels of re-use rather than capacity for re-use as above.

- Much “re-use” occurs before items are discarded and become “waste” (e.g. through the private sale and exchange of second hand goods). As such, “re-use” can be considered an option that sits above the Waste Hierarchy as well as within it. The strategy could propose to do more to promote the re-use of goods before they get discarded as waste (e.g. through promoting private re-sale via Ebay, car boot sales etc) even if this is strictly beyond the scope of a waste management strategy.
- It should be noted that items collected for “re-use” are not “waste” and that this may affect some of the Mayor’s calculations.

4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% by 2031.

Comments:

- The first two of these targets are contained in the National Waste Strategy for England published in May 2007. However, the contribution different regions are expected to make towards the achievement of national targets should reflect their local circumstances. In London’s case, this should mean a lower than average contribution, reflecting the low level of compostable garden waste in London’s household waste stream and the particular difficulties of achieving high capture rates at flatted premises and in households with limited space for storage. However, at Appendix 3 page 2, it states that “*The Mayor’s targets are more ambitious than those set by the Government and reflect regional circumstances, such as the declining landfill capacity accepting London’s waste; the need to significantly improve municipal recycling or composting performance- London is the lowest performing region in the UK; and the need to significantly increase the amount of waste managed within London to achieve greater self sufficiency in line with Planning Policy Statement 10.”* This seems to miss the point that London is the lowest performing region because of its low level of garden waste arisings and high level of flatted premises. The other two reasons given for the high targets could be alternatively addressed by increasing London’s residual waste recovery capacity. Figures 4, 5 and 6 illustrate this point well- London’s dry recycling performance is only slightly below average but cannot achieve high composting rates, esoecially in inner London, due to the low level of garden waste and high number of flats. The recycling column in Table 1 (page 40) should be split into “recycling” and “composting” to highlight this further.

- The 60% target goes above and beyond national and European targets and its achievability without incurring excessive cost is questionable. Based on Wandsworth's current municipal waste arisings, it is doubtful whether it could comply with this even if 100% capture rates for all currently targeted materials plus food waste were achieved.
- At Appendix 3, page 2, it is stated that "*The Mayor's targets are for London to achieve as a whole, placing no requirement on individual waste authorities to achieve them.*" This should be stated clearly within the "Policy 4" section of the Strategy, but is not.
- The particular contributions the Mayor expects individual boroughs to make towards the achievement of these targets is unclear, but outer London Boroughs collecting large quantities of compostable garden waste and with lower proportions of flatted premises can reasonably be expected to make bigger contributions.
- The Strategy should make it clear how the MoL intends to ensure that the sum total of borough contributions towards achieving improved recycling rates will ensure that his targets are met.
- Applying these targets to municipal rather than household waste may create a perverse incentive for boroughs to increase their competition with privately operating licensed waste carriers providing commercial waste recycling services, thus attracting more (recycled) waste into the municipal waste stream and making it harder for London to reduce its municipal waste. Presumably this is why the target for waste reduction is limited to household waste only.
- There is no justification for including anaerobic digestion within these targets as its CO2eq performance is on a par with incineration with EfW. It should be excluded from the calculations, with the targets revised downwards to compensate.
- See also comments on Policy 4 and Proposal 4.1 below.

5. The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately:

1.2 million tonnes of CO2eq in 2015

1.4 million tonnes of CO2eq in 2020

1.6 million tonnes of CO2eq in 2031

Comments:

- See also comments on Objective 2 above.

- A commendable objective. However, there is significant doubt about how accurately carbon equivalent emissions can be measured using "WRATE" or otherwise and close analysis of the carbon benefits of some initiatives designed to achieve the Mayor's high recycling targets may indicate little if any benefit from them e.g. the separate collection of food waste for recycling.
- Whilst the draft strategy provides a current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall, it does not provide a borough level breakdown of this figure and Wandsworth does not hold this data internally either or have direct access to WRATE. It is therefore not currently possible for Wandsworth to assess the CO2eq impacts of the borough's municipal waste management or the size of reductions likely to be achieved by future changes in how the waste is managed. The Mayor's proposed "ready reckoner" will largely address this (subject to the reliability of the data) but in the meantime it is difficult to assess the contribution Wandsworth can make towards the achievement of these targets or the associated financial costs / savings.
- At Appendix 4b, it appears that the current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall excludes collection related impacts. The figure should therefore be presented as a figure for "London's municipal waste disposal and treatment activities overall" or be revised upwards to include collection related impacts. It is important that this should be clear in the main Strategy, as most people will not read the Appendices.
- On page 89 there is a reference to the "…emissions-saving effect of recycling and composting activities." Table 5 on page 92 shows an emissions saving effect for in-vessel composting but not for open windrow composting. It would therefore be helpful to insert the word "in-vessel" before "composting" in the statement on page 89.
- NB- Our comments on the 1st draft in Jan 10 said that we did not agree with the Mayor's proposed approach for the management of London's municipal waste based on lifecycle greenhouse gas performance (mainly because it could add unnecessary costs for local authorities, would be inconsistent with national and EU policies and can cause conflicts with the waste hierarchy).

6. To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is

replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.

Comments:

- This is not a "SMART" target as it is not measurable- how would we recognise the point at which "as much energy as possible" was being extracted? It would be preferable to set a target in terms of e.g. kilo-joules generated or percentage increase from a baseline.
- If a target is not set in terms of kilo-joules generated or percentage increase from a baseline, then "…a*s much energy as possible…*" should be more closely defined or replaced with "…a*s much energy as is reasonably practicable…"* or similar.
- There is a danger that the Mayor's preference for emerging new technologies over incineration with energy recovery could result in more waste than necessary going to landfill, either because the new technologies fail to deliver as promised or because local authorities are unable to afford them.
- The Mayor's commitment to utilising waste heat from EfW processes e.g. through the provision of district heating ring main piping systems (as exist in Paris and Amsterdam) as detailed at pages 129-130 of the Strategy is welcomed. Realistically however, the prospects of this actually being delivered still seem remote, especially given the imminent demise of the LDA and its central government funding.

To achieve the Mayor's objectives and targets, the strategy will focus on the following six policy areas, each containing a number of proposals:

D. Policies and proposals

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling municipal waste

Comments:

- A commendable policy. However, the costs associated with successful and comprehensive communications programmes should not be under estimated. Resources for achieving this (e.g. for Recycle for London and borough level activities) may prove insufficient to produce a step change in awareness levels,

especially in the context of the level of financial savings that local authorities must achieve over the next four years.

Proposal 1.1: Setting waste reduction and re-use targets

Comments:

- See comments on targets 2, 3, and 4 above.

Proposal 1.2: Supporting London-wide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling

Comments:

- A commendable proposal. However, Recycle for London's available funds may well prove insufficient to provide the level of support necessary to ensure the achievement of related targets and objectives contained in the Strategy.
- Recycle for London only has resources allocated until 2013, but targets for waste reduction, reuse and recycling are set until 2031. Substantial support will need to be provided throughout this period if the targets are to be achieved.
- As households within many "Zero Waste Places" projects are likely to be producing more waste per household than the typical household in Wandsworth, their ability to "showcase best practice" is limited. It is noteworthy that the related criteria for "Green Zones" quoted in Box 6 do not include a limit on the quantity of waste produced. If any impressively low figures exist for the quantity of waste produced by Zero Waste Places, these should be quoted in the Box, along with outline details of how the low levels of waste generation were achieved.

Proposal 1.3: Reducing the amount of municipal waste entering the waste stream

Comments:

- A commendable proposal.
- The first bullet point under this proposal on page 76 states that "the Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code." According to the definition of municipal waste being used this support will only contribute

towards the achievement of municipal waste targets and objectives if it is focussed on businesses whose waste is collected by local authorities.

- Wandsworth has pursued effective municipal waste management reduction policies for many years and probably has the lowest municipal waste arisings per household in London (795kg/hh/annum in 2009/10). In particular, charging policies which encourage commercial waste producers to utilise privately operating licensed waste carriers are effective at reducing municipal waste arisings. Enforcement activities to squeeze out trade waste illegitimately entering the collected household waste stream (e.g. enforcement against the abandonment of trade waste on street and against domestic collection crews taking back-handers to collect commercial waste) have also proved effective, as has the generally policy of re-charging full collection costs where the power to do so exists (e.g. household garden and bulky waste). And Wandsworth's successful trial of the on-site pyrolysis of residual waste at a residential block of flats recently won CIWM's "Innovative Practice in Waste Management and Resource Recovery" award. These are all practical ways of reducing the amount of municipal waste entering the waste stream which could potentially be effective across London.
- Revisions to Schedule 2 of the Controlled Waste Regulations may also help to reduce the household element of municipal waste by reducing the price incentive for Schedule 2 premises to utilise local authority waste collection services.
- The ability of local authorities to influence the amount of household waste (which accounts for 98% of municipal waste in Wandsworth) requiring collection should not be over estimated. There is still a close link between levels of economic activity and waste generation, and waste reduction measures implemented outside the sphere of local authorities will be crucial in influencing the extent to which this proposal is achieved.
- The Mayor's efforts to encourage London's waste collection authorities to collect more commercial waste for recycling will actually attract more waste into the municipal stream.
- The three bullet points on page 76 detailing what the Mayor will actually do to achieve the aims of this proposal all relate to commercial waste, but 98% of

Wandsworth's municipal waste is from household sources. The strategy should contain more detail on how the Mayor intends to achieve the aim of this proposal.

- Proposal 1.3 relates to municipal waste and so is inconsistent with Target 2 which relates to household waste. If the Mayor proposes to reduce the amount of municipal waste entering the waste stream, why not set a reduction target for municipal rather than household waste?
- The Mayor's efforts to encourage packaging and product design that reduces waste should seek to engage with and influence marketing departments as these are often the main barrier to the adoption of lighter weight or more recyclable packaging and also commission large quantities of "direct marketing" (unsolicited junkmail).

Proposal 1.4: Tackling barriers to providing effective reuse services

Comments:

- A commendable proposal. However, a significant barrier to increasing the re-use of items that would otherwise become waste is the relatively low cost of new products compared to the cost of repair and refurbishment. Tackling this barrier is likely to require national action e.g. increased taxes on virgin materials / new products and/or tax advantages for second hand goods and recycled products.

Policy 2: Setting a CO2eq emission performance standard for municipal waste management activities to reduce their impact on climate change.

Comments:

- The Council supports this policy in principle but believes that there are a number of significant issues to address before it can be relied upon in practice to reduce the climate change impacts of London's municipal waste.
- The Strategy should make the difference between a "performance standard" and a "target" clear. Other policies have related targets but this one has a performance standard- why? If "performance standards" carry more weight, this should be made clear.

- It should also be made clear whether, unlike the recycling targets contained in the strategy, individual boroughs will be expected to comply with this standard. If so, some boroughs are likely to find it much harder to comply than others according to the proportion of flats they have, the number and size of gardens and whether they have CA sites.
- The data behind the Mayor's standards is based on reports from a single consultancy, without peer group review, and includes some significant assumptions (some in contradiction of Government guidance). The outcome is that the Mayor's Strategy is a high risk/high cost approach and, with no Plan "B", the consequence of failure will be a continued reliance on landfill. The old 'presumption against incineration' continues but the charge that EfW (combustion) would 'crowd out recycling' appears to have now morphed into it will 'crowd out renewable energy'.
- The EPS appears to be set on the assumption that the Mayor's waste reduction and recycling targets will be met. It appears that each London Authority may be required to meet/exceed the EPS, in which case London as a whole would exceed both the standard and the recycling and waste reduction targets. So whilst it is clear that there is no direct requirement on London's individual waste authorities to meet the Mayor's targets, the requirement to comply with the EPS at an individual authority level may force them to do so anyway, at least if this achievable without incurring excessive cost, which is doubtful.
- It should be noted that the MoL's waste Hierarchy is only a guide- *"…the scenario that performs best in CO2eq emissions terms should be given preference."* (p55)
- For a CO2eq performance standard to be useful, the data for different processing options needs to be reliable. The size of the variations in the figures for kg CO2eq per tonne between Table 2 in the Assembly draft and the Public Consultation draft suggest a high degree of uncertainty may exist. And not all the data in Table 2 matches that provided by Defra on its website at: http://www.defra.gov.uk/environment/business/reporting/pdf/101006-guidelines-ghg-conversion-factors.xls (updated Oct 2010).
- On p53 it states that Table 2 "…*shows the potential lifecycle performance of different waste management methods for various waste materials.*". However,

it appears that the figures take no account of the additional collection impacts involved with collecting different material streams separately (e.g. additional vehicle movement, slop buck and caddy liner related impacts). The Strategy should make this clear. These impacts may have a significant effect on which option is identified as having the lowest lifecycle impacts and excluding them will only encourage solutions with high collection related impacts to be adopted. That could have serious implications for London's air quality and traffic congestion.

- On page 95 it is stated that "*Emissions from transport usually contribute a relatively small proportion of the total emissions from waste management activities (approximately 5-10%)*. This figure sounds surprisingly low and the source and basis for this figure should be quoted.
- On p54, Table 2 now excludes the "incineration (generating electricity only)" column that was included in the January 2010 draft- why has this been removed? Its inclusion highlighted that this is the most carbon friendly option for organic waste including "garden/plant waste", "wood waste" and possibly "mixed waste". Adding a further column to the table for Incineration as a disposal option (low energy recovery efficiency) and a recovery option as defined by the 2008 Waste Directive could highlight how incineration processes with high energy recovery efficiency might be the best option for other waste streams too e.g. food waste.
- It would also be helpful if Table 2 split composting into "home" and centralised".
- It should be noted that, even without heat recovery via the provision of a district heating ring main, the Belevedere EfW incinerator is classed as a "recovery" process under the 2008 Waste Directive. It is "CHP enabled" and MoL's support for the establishment of a district heating ring main to utilise this is welcomed. Additionally, by accepting waste deliveries by river barge it will help keep around 100,000 lorry movements off the roads annually and will make a substantial contribution towards London's ability to meet LATS targets. The Strategy's lack of recognition of the specific contribution the Belevedere facility will make towards the achievement of important waste management goals and the contribution incineration with EfW plants could make in general is notable

and appears to be based on little more than prejudice against incineration with EfW facilities.

- The 2008 Waste Directive gives, at Annex 11, item R1, the energy efficiency standards which make incineration a "recovery" rather than "disposal" option. The Mayor's strategy should reflect this categorisation.
- WRATE analysis by both WRWA and LB Lambeth suggests that, even without heat recovery, there would be no significant environmental benefit in diverting food waste from the Belevedere EfW incinerator through its separate collection for recycling. There would however be substantial costs involved.
- On p92, the reference to "Table 6" in the text should read "Table 5".
- On p97, it is unclear what the difference between the two "electricity only" rows for incineration is.
- It should be noted that the boroughs will bear the full costs of achieving compliance with the EPS, but a significant proportion of the theoretical income from achieving it will not return to them (e.g. the "monetised CO2 benefits").
- See also comments on Appendix 4a below.

Proposal 2.1: ***The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.***

Comments:

- "Greatest possible" is open to interpretation and should be more closely defined. The greatest possible CO2eq savings are only achieved once all waste has been eliminated and as more waste is moved up the hierarchy, the marginal cost of moving further waste up the hierarchy is likely to rise, eventually to a point where to do so does not represent a cost-effective environmental gain. "Greatest possible" should perhaps be replaced with "substantial".

Proposal 2.2: ***Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation***

benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Comments:

- The statement that "*The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost."* is confusing. It is unlikely that it could be set at a level which achieves both and it is unclear how the EPS would take account of cost information.
- See also comments on Target 5 and Policy 2 above.

Proposal 2.3: *In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.*

Comments:

- Any minimum CO2eq performance standard for energy from residual waste should be set at a level so as to ensure that processes classed as "recovery" under the 2008 Waste Directive are generally able to comply with it.
- There is no disagreement with the principle that London's municipal waste, used for energy generation, should have a carbon intensity less than, or equal to, the source of energy generation it displaces. The concern is that the Mayor has decided that it is energy generated by "combined cycle gas turbine (CCGT) plant" which will be displaced. CCGT is very efficient and is assumed to generate electricity at a carbon intensity of 387grammes CO2 per kilowatt hour (CO2/kWh), this compares with a national grid mix of around 517g CO2/kWh. In reality, EfW will displace coal fired power stations (around 40% of the grid mix) which produce over 900g CO2/kWh and will struggle, by a 2015 deadline, to comply with the EU's 'Large combustion plant directive'. A reliance on power from imported gas also leads to concerns on the security of national energy supplies. This bench mark is based solely on this one study which underpins the strategy. The implications are so important that there must be time to evaluate the study and its conclusions if for no other reason than to ensure that there is a very firm basis for the Mayor's reliance on one option which has no

Plan “B”. There are organisations that serve London that have the expertise to provide the “challenge” and time must be allowed for such a challenge.

- The Mayor expects Belvedere to operate at a carbon intensity of 400+g CO2/kWh therefore even the most modern waste combustion plants (despite being classified as Recovery operations under the Waste Framework Directive) will not be able to meet this standard unless developers can find ways to use the heat as well as the electrical output. Work by the LDA and ODA demonstrates the difficulty of securing heat distribution and the Renewable Energy Association is concerned that making it compulsory could be raising the bar too high. The Government view is that the principle purpose of waste combustion is simply to reduce the amount of waste going to landfill. The Mayor has made no consideration of the costs of meeting his ‘carbon intensity’ floor and his preferred technological solutions anaerobic digestion, gasification and pyrolysis are unproven (DEFRA’s New Technologies Demonstrator Programme provides evidence), and consequently difficult to finance despite £millions in Government subsidies being available. Additionally, AD is only able to deal with a proportion of the waste stream.
- The EPS assumes energy will be recovered from ‘low carbon’ waste sources (e.g. food, via his preferred but unproven technology mix) coupled with increased recycling of fossil fuel based materials such as plastics and textiles. The Mayor’s consultants acknowledge this could lead to a requirement for separate food waste collections, kerbside sorting of recyclables (associated traffic congestion) and, to help balance the costs, fortnightly residual waste collection. The financial costs of meeting the EPS will fall entirely on the boroughs but significant elements of the income will not return to them as a large proportion will be retained by private sector providers, some will simply not materialise at all (no account of the volatile nature of the materials market appears to have been taken and the strategy is dependant on optimistic prices and markets for recyclable materials remaining constant) and notional benefits, such as the ‘monetised’ value of Greenhouse Gas Emissions, will not translate into cash in borough coffers.
- The Mayor’s advisors have admitted that London boroughs are not currently meeting the EPS, and changes will be required, but no evidence of what this

will cost has been provided. Local authorities will not have the resources to provide any waste service that is not based on good economic grounds. There are no data that is currently available that provides evidence that extracting energy from food and green waste is less beneficial in all the circumstances that recycling, yet the Mayors strategy is forcing councils to provide these recycling services on the basis that the carbon saving is significant and therefore there is an overall cost saving.

- The consultants report makes it very clear that unless the so called "best practice" is adopted such as AWC and kerb-side sorting then none of its modelling is reliable. Many authorities in London, particularly in Inner London, will not be able to adopt this best practice. The Mayor must consider the reality of London and ensure that landfill is avoided energy is recovered and recycling is encouraged without London incurring costs it can ill afford at this time.
- The Strategy should recognise the time lags involved with procuring waste disposal facilities and their long operational life spans. The Belevedere EfW incinerator was originally planned in the early 1990s, will start operating in 2011 and will have a c. 30 year lifespan. As such, its procurement pre-dates the carbon agenda and, district heating networks and increased diversion of e.g. plastics aside, it would be unreasonable to expect WRWA to "…*have steps in place to meet (the EPS) in the near future."* In practice it is likely that this could only be achieved at excessive cost. The requirement to comply with CO2eq performance standard for energy from residual waste should be qualified to exclude facilities which have already been procured and to which disposal authorities are contractually bound for years.
- Energy from waste cannot be assumed to be replacing other energy sources- it may be additional to existing capacity.

Proposal 2.4: ***The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.***

Comments:

- A commendable proposal although the more simplified any tool is, the less accurate it is likely to be. And any tool can only be as good as the data behind it, but the range of different CO2eq performance figures for different processes across different data sources and the regularity with which the data gets updated and changed casts significant doubt over how reliable any such tool could be.
- This may help to keep the monitoring and reporting burden to an acceptable level.

Proposal 2.5: ***The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.***

Comments:

- A commendable proposal. However, by failing to take full account of collection related impacts (e.g. in Table 2) the Mayor may inadvertently encourage adverse impacts on London's air quality by encouraging collection intensive solutions.

Proposal 2.6: ***The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.***

Comments:

- A commendable proposal (subject to details of FORS).
- This proposal appears to support WRWA's transportation of residual waste by river barge although this comes at a financial cost.

Policy 3: Capturing the economic benefits of waste management.

Comments:

- A commendable policy.
- On page 103 it states that "*The Mayor will work with London's waste authorities …. to ensure that London is taking steps to maximise the economic benefits to London from its waste management.*" It would be helpful to expand upon this statement to indicate

the types of action by the waste authorities that the Mayor envisages to achieve this aim.

- See also comments on objective 3 above.

Proposal 3.1: *Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.*

Comments:

- A commendable proposal. However, London's waste authorities should not be arm twisted by the Mayor into utilising the efficiency opportunities he has identified- If they are sufficiently attractive the opportunities will be taken up regardless.

Proposal 3.2: *Establish a framework of waste collection contracts from which waste collection authorities can draw down services.*

Comments:

- A commendable proposal. However, again, London's waste collection authorities should not be arm twisted by the Mayor into utilising his framework contracts- If they are sufficiently attractive they will be utilised regardless.
- For this to work, participating Councils will be required to agree to standard award criteria, which is likely to require changes to their procurement policies.

Proposal 3.3: *Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.*

Comments:

- A commendable proposal. However, again, London's waste authorities should not be arm twisted by the Mayor into utilising his framework contracts- If they are sufficiently attractive they will be utilised regardless.
- Clarity could be added by inserting the word "disposal" before "authorities".

Proposal 3.4: *Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling1 and closed loop recycling.*

Comments:

- A commendable proposal. However, LWaRB's available funds are limited compared to the scale of the Mayor's ambitions.

Proposal 3.5: *Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.*

Comments:

- A commendable proposal although private ownership will often be more advantageous.

Policy 4: Achieving high recycling or composting rates resulting in the greatest environmental and financial benefits.

Comments:

- This is how the policy is given in the Executive Summary, but the main body of the strategy (at page 113) excludes "resulting in the greatest environmental and financial benefits".
- For the most part, it is unlikely that any single approach would result in both the greatest environmental benefits and the greatest financial benefits- there will often be a trade-off between the two. As it stands, it is unclear whether this policy supports measures the achieve environmental benefits through recycling at a net financial cost. This policy would therefore be clearer if it were amended to "*Achieving high recycling or composting rates resulting in the greatest environmental at acceptable financial cost."*
- There is a significant risk that forcing waste collection authorities to chase high recycling targets would result in greatly increased collection costs for little or no environmental benefit. For example, WRATE analysis undertaken by both WRWA and LB Lambeth indicates that diverting food waste from Belevedere EfW by collecting it separately for centralised composting or AD would produce little if any environmental benefit. But it's separate collection would probably cost in excess of £1m annually plus much higher costs in the first year for container supply, distribution and communications.
- Table 4 on page 116 contains a duplicated column for 2008 data.
- See also comments on Target 4 above.

Proposal 4.1: ***The Mayor will set recycling and composting (including anaerobic digestion[1]) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031.***

Comments:

- On page 114 it states that achieving 60% recycling could save "…*about £60 in waste collection and landfill disposal costs each year.*" However, it would only reduce landfill disposal costs in boroughs relying on that method of residual waste disposal and in Wandsworth's case, the increased collection cost achieving 60% implies would be likely to significantly outweigh any related net disposal saving.
- It is difficult to see how the proposed route from 25% to 60% recycling as illustrated in Figure 18 could be applied to Wandsworth as:
    - Putting 3% of municipal waste from the 4 WRWA boroughs through the re-use centre scheduled to open in 2011 equates to around 12,000 tonnes annually, but the capacity of the facility will be nearer 1,000 tonnes.
    - Doorstep recycling tonnages have levelled off and actually started to decline in recent years.
    - No local businesses have requested the Council to provide recycling collection services. This is unlikely to change in the foreseeable future and in any case, chasing recycling targets by attracting new waste into the municipal stream misses the point and is only likely to increase the carbon impacts of London's municipal waste.
    - This leaves a potential 15.02% increase which would get Wandsworth to around 40% recycling.
- Whilst composted parks green waste may count towards municipal waste recycling targets in theory, the most eco-friendly and cheapest option is usually to compost it on-site within the park, which usually means it isn't weighed and falls outside the measured municipal waste stream.
- The text below Proposal 4.1 on page 117 is confusing- Where recycling and composting delivers the best economic and environmental outcomes, surely local authorities will be inclined to consider this before energy generation even in the absence of the Mayor setting high recycling targets? And wouldn't it make more sense to say that, where energy generation and recycling/composting have similar

performance in environmental terms, cost should be the deciding factor? And if cost related considerations can over-ride the Mayor's Waste Hierarchy, this should be clearly stated in Chapter 4 as is the ability for CO2eq considerations to over-ride it.

- See also comments on Target 4 and Policy 4 above.

Proposal 4.2: ***The Mayor, through the London Waste and Recycling Board's best-practice coordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.***

Comments:

- A commendable proposal. However, London's waste collection authorities should remain free to determine the design of the recycling services that they consider to be most appropriate for their borough.
- Households without gardens, which account for a substantial proportion of the total, will not have much use for composting services for garden waste. There is unlikely to be much if any environmental benefit associated with collecting food waste separately for composting in Wandsworth, only substantial cost.
- On page 117 it suggests that boroughs with a high proportion of flats should consider investing in residual waste treatment facilities, including "dirty MRFs". Whilst this may be a valid statement, if there is a question mark over the long term viability of co-mingled collections due to recyclate quality issues, there must surely be a bigger question mark over the quality of recyclate from dirty MRFs. It might be good to qualify this statement with something like "subject to recyclate quality issues".
- On page 118 it is noted that "…it is difficult to present an accurate assessment of London borough collection costs…". It appears that the Strategy consistently underestimates the likely additional collection cost implications of achieving very high recycling rates.
- Also on page 118, it states *that "…the Mayor expects boroughs to first focus on collecting those materials that achieve the greatest CO2eq savings by being diverted from landfill or energy generation. These include organic waste…"*. However, WRATE analysis for the WRWA region suggests that this is not the case locally for

food waste, which accounts for the majority of organic waste in the residual municipal waste stream.

Proposal 4.3: ***The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.***

Comments:

- Wandsworth already does this, but no small businesses have requested the service due to relatively high (but nevertheless reasonable) service charges.
- Wandsworth Council has lobbied for the collection and disposal of SME waste to be funded through business rates, with local authorities as the sole collectors. Whilst this would increase the overall quantity of municipal waste along with associated impacts, it would reduce the collection impacts associated with London's waste overall (by replacing numerous different private collectors all servicing different premises with a single vehicle with a much more efficient collection route. It would also enable local authorities to offer SME waste collection and recycling services at low cost.
- In the absence of the above change, there is no reason to think that local authorities are in a better position to provide small businesses with recycling collection services than privately operating licensed waste carriers, unless they co-collect household and commercial waste. In Wandsworth's case, this lead to the under-estimation of household waste by 18% and an additional disposal cost to the authority of around £300k annually at 2003 prices. It was only by separating the waste streams that the Council was able to demonstrate this.
- Waste Collection Authorities must normally recharge the full cost of collecting and disposing of commercial waste back to the producer, but boroughs wishing to secure a high proportion of the SME waste and recycling collection market may be tempted to under-price their services in order to compete with private sector operators, effectively getting their domestic Council Tax payers to subsidise commercial waste services.

Proposal 4.4: ***The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.***

Comments:

- A commendable proposal. However, spread across London, this equates to around £150k per borough and is unlikely to prove sufficient to achieve the four fold increase in flats recycling by 2031 or the 3.5 fold increase by 2020 envisaged in Table 8.

Proposal 4.5: *The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.*

Comments:

- A commendable proposal.

Proposal: 4.6 *The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.*

Comments:

- Incentive schemes for recycling in the UK are still in their infancy. Their cost effectiveness along with extent of the role they can potentially play in achieving higher rates of recycling is still unclear, especially in the context of flats with communal waste storage and services already achieving high capture rates. It is also unclear how much of the increase in recycling observed with such schemes can be attributed to the existence of the incentive and how much actually relates to the high level of publicity promoting the incentive scheme.
- RecycleBank type schemes are more suited to wheelie bin and box based services than single-use sack-based recycling services which have proved very successful in the WRWA region.
- Recycling incentive schemes are liable to attract more waste into the system, especially if applied to garden waste, with large disposal/processing costs attached. Additional waste can be diverted from elsewhere (e.g. home composting) or occur as a result of the additional consumption stimulated by use of incentives in the form of money off vouchers.
- Subsidies for residents to purchase home composting containers, “Green Cones” or wormeries may well be the most effective form of incentive and can help to reduce the quantity of waste entering the household and municipal waste streams.

Proposal: 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Comments:

- Whilst limited networks of on-the-go recycling facilities for newspapers and magazines can be provided at acceptable cost, more intensive schemes catering for packaging containers tend to have very high collection costs as containers must be small to fit on-street and the packaging is low density, so the containers must be emptied very regularly but produce low tonnage per collection. They also tend to suffer from very high levels of contamination.

***Proposal 4.8:** The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.*

Comments:

- A commendable proposal, but the wording could perhaps be improved e.g. *The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection and recycling service information and performance data across all London boroughs*.

***Proposal 4.9:** The Mayor will ask government to consider implementing a national deposit system for cans and bottles.*

Comments:

- A commendable proposal. There is strong evidence that this is the approach that would achieve the highest possible recycling rates for this material. However, diverting this recyclable material from the household waste stream would make the achievement of high municipal waste recycling targets harder, so if a deposit scheme is introduced the Mayor should consider an appropriate associated reduction to his targets.
- By increasing the purchase cost of soft drinks and bottled water, consumption of these products could be expected to fall, producing an associated environmental benefit plus a health benefit in the case of sugared soft drink consumption.

Policy 5: Catalysing waste infrastructure, particularly low carbon technologies

Comments:

- A commendable policy. However, accurately forecasting future needs in terms of both tonnage capacities and the appropriate split of treatment technologies is inherently difficult.
- LWaRB's remaining funds for catalysing waste infrastructure are limited.
- On page 129 it states that "*The Mayor …. will work with waste authorities …. To develop municipal waste infrastructure in London*." It would be helpful to expand upon this statement to indicate the types of action by the waste authorities that the Mayor envisages to achieve this aim.

Proposal 5.1: The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure.

Comments:

- A commendable proposal.

Proposal 5.2: The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies.

Comments:

- Due to the high costs and environmental impacts of separately collecting domestic food waste, the Food to Fuel Alliance backed exemplar projects mentioned on p136 would probably achieve more CO2eq benefits if fed with waste from London's commercial food outlets.
- See also comments on Policy 5 above.

Proposal 5.3: The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan.

Comments:

- See comment on Objective 4 above.

Proposal 5. 4: The Mayor through TfL, will encourage the movement of waste via sustainable modes of transport.

Comment:

- A commendable proposal. It should be noted that WRWA arrangement for transporting residual waste by river were originally introduced by the GLC which made the investment in riverside waste transfer stations to reduce HGV congestion and emissions across London. The additional cost of river transportation is now met by the WRWA boroughs only but most of the benefits still accrue across London. Residual waste will continue to be transported by river barge when the Belevedere EfW incinerator becomes operational.

Policy 6: Achieving a high level of street cleanliness

Comments:

- A commendable policy which is nevertheless ultra vires. This part of the strategy should be extracted into a separate non-statutory document or be treated as an appendix to the strategy, making it clear that it does not fall within the Mayor's municipal waste powers.
- Restricting this policy to "street cleanliness" excludes other public open places such as parks, open housing estate land and commercially managed open public areas. References to "street cleanliness" should be replaced with "cleanliness of public open places".
- It should be noted that Wandsworth Council has not received any additional Olympic or other external funding to enable it to achieve higher standards of cleanliness for the Olympics. Recent borough-level education and enforcement initiatives are believed to have helped improve recent performance and data suggests that the borough is getting cleaner. However, whether the further significant improvements the Mayor wishes to see for the Olympics can be achieved whilst the boroughs are under severe financial pressure to reduce spending on major services such as street cleansing remains to be seen.
- On page 144 it is suggested that the increased provision of "on-the-go" recycling bins will make littering "increasingly unacceptable" however they are unlikely to be any more effective in preventing litter than litter bins, the provision of which is already widespread.
- The proposals backing this policy are not sufficiently extensive to ensure that this policy results in a significant improvement to the cleanliness of London's streets or other public open places.

Proposal 6.1: ***Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.***

Comments:

- A commendable proposal (which effectively endorses "Love Clean Streets").
- On page 144 it is suggested that this will save London boroughs money and reduce the number of reporting channels and back office costs. In reality it will actually be an additional reporting channel for the foreseeable future. (Love Clean Streets can only be used by those with mobile phones, currently excluding Blackberries, who have downloaded the application. At what stage will enough residents have downloaded it for it to become acceptable for us to stop accepting cleansing related complaints and service requests via telephone/email/web-site/letter/in person? Realistically, that is not an immediate prospect.)
- The extent to which Love Clean Streets would divert reports from existing channels or create additional reports/contacts is also unclear.

Proposals 6.2: ***Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.***

Comments:

- A commendable proposal.

Proposal 6.3: ***Encourage boroughs to recycle or compost their street cleaning waste where practicable.***

Comments:

- A commendable proposal. However, it is unclear what form this encouragement might take (Is this a reference to support from LWaRB?). It would be good to provide detail on the likely form of encouragement that would be available.
- Wandsworth has been able to make significant progress in this area recently due to the recycling of detritus from mechanical street cleansing operations. The only significant barrier to doing more of this is the limited capacity of the reprocessor, Powerday, which it is believed was recently awarded LWaRB support to increase capacity).

Proposal 6.4: ***Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.***

Comments:

- See also comments on Proposal 4.7 above.
- The primary responsibility for dealing with waste from London's events normally lies with the event organisers as it is their own commercial waste. As Wandsworth does not collect this waste it has very little influence over how it is managed. However, where events are held on land managed by the Council, it is generally happy to help ensure that any waste produced is managed responsibly e.g. via event licensing conditions.

Proposal 6.5: ***Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, in advance of the Olympic and Paralympic Games.***

Comments:

- A commendable proposal. However, the Council has significant reservations about encouraging volunteer activities to help keen land clean which the Council is legally responsible for cleaning. Such activities should largely be restricted to neglected areas with no clear cleansing responsibility, but as these account for only a small minority of public open spaces, and as volunteering for clean-up activities remains the preserve of a small minority, the potential impact of volunteer activities in getting London cleaner for the Olympics should not be over-estimated.
- To ensure that London's streets are as clean as possible over the Olympic period the Mayor should seek to secure Olympic funds to enable the boroughs to provide enhanced cleansing services in the run up to and during that time.

Proposal 6.6: ***Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.***

Comments:

- The environmental benefit associated with introducing such a ban is questionable, although it may have wider impacts on behavioural change due to their iconic status.

Proposal 6.7: ***Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting non-stick and degradable gum in London.***

Comments:

- A commendable proposal. However, this is a national problem which may require a national solution.
- An alternative approach would be to encourage or force the adoption of improved gum packaging, incorporating wraps and a pouch for discarded gum, as in use in Japan and as produced locally by Peppersmith.

Proposal 6.8: ***Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.***

Comments:

- A commendable proposal. However again, this is a national problem which may require a national solution.
- Encouraging or forcing tobacco manufacturers/retailers to supply butt pouches free of charge to smokers at the point of sale might be an effective way forward.

Proposal 6.9 ***Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum litter for London in the years leading up to 2012.***

Comments:

- A commendable proposal.

Proposal 6.10 ***Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.***

Comments:

- A commendable proposal.
- The Mayor may wish to investigate the feasibility of providing "exchange" containers on underground trains or stations for passengers to place newspapers and/or books that they have finished with in for others to read.

Other comments on the main document

- The national data behind Figure 1 (Page 29) should be replaced with London specific data (e.g. that used by Eunomia- see Appendix 4a para. 2.3.1. or, if it exists, separate data for outer and inner London). This would help to confirm the achievability of the Mayor's proposed recycling targets.
- In reality, the statement on page 46 that "…*London could save between £573 and £838 million by 2031*" (by complying with the Mayor's proposed Strategy) is unlikely to be accurate. This equates to annual borough savings of around £0.8 - £1.2 million, but the cost of providing enhanced recycling services to achieve the Mayor's targets would be likely to exceed this.
- Significant doubt exists as to whether the procedure adopted by the GLA in revising the Mayor's strategy complies with requirements under the GLA Act.
- The Mayor should clarify his view on the extent to which London's local authorities need must comply with the detailed policies and proposals contained in the strategy to be deemed to be acting "in general conformity" with it.
- The Mayor should amend the Strategy so that it is fully compliant with the 2008 Waste Framework Directive and uses the same definitions of terms used in it. For example, in the mayor's Waste Hierarchy, "prevention or reduction" could be simplified to "prevention" as the EU definition includes "reduction" not to mention "re-use". "Re-use" should be "preparing for re-use" as this refers to recovering items from waste, repairing etc for re-use. The term "re-use" by itself is covered by the term "prevention". "Recycling or composting (including anaerobic digestion)" should be simplified to "recycling" as the EU definition includes composting. However, anaerobic digestion is a recovery treatment, not recycling. Both "Treatment of waste through energy generation, producing electricity and using waste heat" and "Treatment of unsorted waste through energy generation, producing electricity only" could be recovery options if they are sufficiently energy efficient or disposal options if they are not. It would be much better to split these options according to the EU definitions of recovery and disposal, relating to the efficiency of energy recovery. "disposal of waste to landfill" should be simplified to "disposal" alone. This may mean that some data needs to be adjusted to match the EU terminology.
- The deadline for consultation responses should be extended until some weeks after the Government announces the results of its Review of Waste Policies.

- References to the “Belevedere incinerator” should be changed to the “Belevedere Energy-from-Waste incinerator” to highlight the contribution it will make towards the MoL’s energy recovery goals.
- The draft revised strategy takes insufficient account of the financial squeeze on local authorities. Achievement of the proposed recycling and CO2eq targets is likely to have substantial and possibly excessive costs attached. And it is unclear whether any given level of cost could become “excessive” as the financial squeeze on local authorities gets tighter.
- The Mayor’s Strategy should use the definitions given at Article 3 of the 2008 Waste Directive.
- The focus on re-use within the Strategy is to be welcomed. However, re-use prior to collection by WCAs (e.g. via “Freecycle”) should be considered as something that sits above the Waste Hierarchy rather than within it as it happens to goods before they become waste.
- On page 83 (The Wandsworth based case study on waste reduction), the word “tonnes” should be removed after “£345,000”.
- The wording of policies and proposals should be consistent throughout the document but often differs between the contents of the blue summary boxes at the start of each chapter and where the full detail is provided.
- It is unclear why the Strategy should seek to encourage more commercial waste into the municipal waste stream. The appropriate place to provide strategy for commercial waste that isn’t already municipal waste is the Mayor’s draft Business Waste Management Strategy.
- The Mayor should lobby the Government to accept the inclusion of recyclables recovered from incinerator bottom ash in recycling calculations.

Comments on Appendix 3

- Table one shows that PFI funded projects are expected to make up 32% of total processing infrastructure capacity. It is unclear how the Mayor expects to achieve zero waste to landfill now that London’s waste PFI funding has been cancelled. Defra have stated that PFI funded capacity will no longer be needed to meet EU landfill diversion targets for 2020, so it seems that Defra accepts that London may need to

rely on landfill or other disposal capacity outside London and that Defra does not support the mayor's proposed regional self sufficiency. London's best option may be to purchase LATS permits.

Comments on Appendix 4a

- **(Figure ES3: Breakdown of Cumulative GHG Emissions (2008 to 2031)):** It appears that the incineration data behind this chart has been adjusted to reflect that higher recycling/composting reduces the organic content of residual waste in later years. As a result, incineration shows a reduction of 27.3kt CO2eq in 2015, but in 2031 it emits 28.6kt CO2eq. The incineration data is probably based on lower efficiency plants now in use, but Belevedere will be a high efficiency recovery plant. This is likely to mean that, within the WRWA region, there would be little or no benefit in separating organic fractions of residual waste for in-vessel composting or anaerobic digestion and that the additional collection costs and impacts of doing so could not be justified. Belevedere may even enable the WRWA region to comply with the EPS without meeting the Mayor's recycling targets!
- **(Page 77- 9.4 All Schemes to 'Kerbside Sort' Collection Systems):** Whilst it may be true that the net system costs of kerbside sort recycling collection services are generally lower than those for co-mingled services for any given level of recycling, there is strong evidence that co-mingled services tend to achieve higher rates of dry recycling, reducing waste disposal costs.
- **(Page 77- 9.4 All Schemes to 'Kerbside Sort' Collection Systems):** The kerbside sorting approach would not be suitable for Wandsworth due to the adverse effect its introduction would have on the speed of collection vehicle progress and the impact of this on other traffic movements.
- **(Page 77-9.5 All Schemes to Weekly Refuse Collection):** It appears that according to the Mayor's modelling, achievement of the proposed high recycling targets is dependent on reducing the frequency of residual waste collection below weekly. In Wandsworth, the frequency of residual waste collection has been carefully balanced to reflect difficulties with waste storage. Approx. 4,700 flats above shops in town centre locations receive a nightly collection. Reducing this collection frequency to fortnightly

would lead to huge problems with dumping of residual domestic waste in town centres, with adverse implications for the achievement of the Mayor's Policy 6. A further 900 flats receive thrice weekly collections and 23,500 flats receive twice weekly collections. These account for between 21-22% of all premises in the Borough. The Council has already sought to reduce these numbers as much as possible as collecting more frequently than necessary costs a lot of money. However, existing bin chambers at the premises receiving twice and thrice weekly collections do not have space for additional storage capacity and the premises receiving nightly collections have no external storage space at all.

Comments on Appendix 4b

- **(Page 4-72.1.1 Determination of Baseline CO2e Performance):** The exclusion of emissions from waste collection related transport biases the strategy towards favouring solutions with high collection related carbon impacts but low downstream processing impacts and may result in waste authorities calculating CO2eq impacts/savings which exceed those achieved in reality.
- **(Page 4-72.1.1 Determination of Baseline CO2e Performance):** As NI 185 has now been abolished, this incentive for local authorities to reduce their transport related impacts no longer exists.

Comments on the Mayor of London's Draft (revised) Municipal Waste Management Strategy (Public consultation draft)

General comments

- The consultation periods for the Mayor's Energy and Waste strategies should be extended to allow respondents to properly reflect the outcome of current Government consultations in these areas. Until these consultations are completed and the results assessed and put forward into a new national strategy or at least a draft then the consultation on the Mayor's strategy is at best premature.

A. The Mayor's vision for London's municipal waste

"Ultimately, the Mayor wants London to become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

The Mayor's vision is built upon his waste hierarchy, applied from the top down. The Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it."

Comments:

- A commendable vision, however:
- The Mayor's Waste Hierarchy on p11 differs from that in Article 2 of the 2008 Waste Directive. It would be preferable and less confusing if the same hierarchy was used.
- Whilst the above vision states that the "…Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it", the draft Strategy only supports movement up the hierarchy where this is associated specifically with a reduction in CO2eq emissions, and does so regardless of whether this also achieves cost savings.
- The quantitative assessment of waste reduction and reuse is yet to be proven, without this it will be difficult to confirm if this objective has been achieved.

The following objectives and targets support the Mayor's vision:

B. Objectives

1) Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

Comments:

- The GLA is in a good position to deliver this commendable objective via the "Recycle for London" (RfL) campaign, with funds awarded by LWaRB. Boroughs can also bid for RfL funds to increase participation in local services. However, LWaRB now only has £22.9m of its original £73.4m pot left- not much to deliver this objective across London.

2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.

Comments:

- A commendable objective.
- There are difficulties with measuring the carbon impacts of London's municipal waste and having a high level of confidence in the data. In particular a) there are substantial differences in the Co2eq figures for different disposal / recovery / recycling processes between different sources of data and b) collection related impacts (vehicles, containers etc) are significant and should not be ignored.

3. Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.

Comments:

- A commendable objective. However:
- The Mayor should not ignore the additional collection costs associated with achieving high recycling rates which are increasingly likely to exceed the economic value of diverting additional materials from waste disposal as higher rates are reached. The strategy appears to count economic benefits of high recycling rates rather more thoroughly than the costs involved in achieving them. And whilst the costs will be borne by London's waste authorities, not all the economic benefits will flow back to them.
- It should also be noted that in some cases generation of clean energy from waste is in conflict with achieving high recycling rates or reducing waste.

4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

Comments:

- This objective should be secondary to objective 2 above- if the impact of London's municipal waste management on our environment and its carbon footprint can be reduced by managing parts of it outside London's boundary (including transport related impacts), there is little reason not to do so. In particular, a substantial proportion of the waste collected for recycling is likely to be managed outside London's boundary for the foreseeable future.
- Also concerns about the ability to reprocess all residual waste within the region. In many cases pre-treating in London and then transporting by rail or water to larger scale plants is more sustainable than smaller scale plants within the boundary.
- The boundary is less important to outer London boroughs where proximity principle should prevail rather than travelling long distances to the other side of London.

C. <u>Targets</u>

1. To achieve zero municipal waste direct to landfill by 2025.

Comments:

- A commendable target which will require significant investment from Local Authorities and the private sector.
- It may be difficult to achieve with current NIMBY mentality and unless some of the planning constraints are overcome.

2. To reduce the amount of household waste produced from 970kg per household in 2008/09 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household.

Comments:

- Reducing the amount of household waste is a commendable aim and it is appropriate to set a target for this. Although the starting level seems quite high, it needs to be to account for different levels of waste generated in inner and outer London boroughs.
- The Strategy does not contain proposals sufficient to ensure that a 20% reduction per household will be achieved.
- The Strategy should recognise the limited impact London's waste authorities can have on influencing the quantities of household waste requiring collection. In particular, levels of economic growth, number of inhabitants per household and industry measures to reduce packaging waste are likely to have substantial impacts on waste arisings.
- It is inconsistent that waste reduction targets in a "municipal waste management strategy" a key aim of which is to "…reduce the amount of municipal waste generated by the Capital…" (see Section A. above), should only apply to the household waste element of it- Why not set targets for reducing municipal waste?
- The Strategy's support for the introduction of national deposit schemes for bottles and cans could help towards achieving this target by removing them from the household waste stream. However, this would also make the achievement of high recycling targets for municipal waste more difficult. If a national deposit scheme is introduced, it may be necessary to revise recycling targets downwards.
- See also comments on proposal 1.3 below.

3. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031.

Comments:

- A commendable target and we support the move to focus higher up the waste hierarchy.
- However, it is not clear why the target set is to provide capacity rather than to actually utilise the capacity.
- The capacity tonnage targets appear over-optimistic, particularly in light of recent cuts to LWaRB funding.
- On page 75 the second bullet point under Proposal 1.1 refers to the Mayor setting a target to achieve actual levels of re-use rather than capacity for re-use as above.
- Much "re-use" occurs before items are discarded and become "waste" (e.g. through the private sale and exchange of second hand goods). As such, "re-use" can be considered an option that sits above the Waste Hierarchy as well as within it. The strategy could propose to do more to promote the re-use of goods before they get

discarded as waste (e.g. through promoting private re-sale via Ebay, car boot sales etc) even if this is strictly beyond the scope of a waste management strategy.

- It should be noted that items collected for "re-use" are not "waste" and that this may affect some of the Mayor's calculations.

4. To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% by 2031.

Comments:

- The first two of these targets are contained in the National Waste Strategy for England published in May 2007. However, the contribution different regions are expected to make towards the achievement of national targets should reflect their local circumstances. In London's case, this should mean a lower than average contribution, reflecting the low level of compostable garden waste in London's household waste stream and the particular difficulties of achieving high capture rates at flatted premises and in households with limited space for storage. However, at Appendix 3 page 2, it states that "*The Mayor's targets are more ambitious than those set by the Government and reflect regional circumstances, such as the declining landfill capacity accepting London's waste; the need to significantly improve municipal recycling or composting performance- London is the lowest performing region in the UK; and the need to significantly increase the amount of waste managed within London to achieve greater self sufficiency in line with Planning Policy Statement 10."* This seems to miss the point that London is the lowest performing region <u>because</u> of its low level of garden waste arisings and high level of flatted premises. The other two reasons given for the high targets could be alternatively addressed by increasing London's residual waste recovery capacity. Figures 4, 5 and 6 illustrate this point well- London's dry recycling performance is only slightly below average but cannot achieve high composting rates, especially in inner London, due to the low level of garden waste and high number of flats. The recycling column in Table 1 (page 40) should be split into "recycling" and "composting" to highlight this further.
- The 60% target goes above and beyond national and European targets and its achievability without incurring excessive cost is questionable. Based on the council's current municipal waste arisings, it is doubtful whether it could comply with this even if 100% capture rates for all currently targeted materials including food waste were achieved.
- At Appendix 3, page 2, it is stated that "*The Mayor's targets are for London to achieve as a whole, placing no requirement on individual waste authorities to achieve them."* This should be stated clearly within the "Policy 4" section of the Strategy, but is not.
- The particular contributions the Mayor expects individual boroughs to make towards the achievement of these targets is unclear, but outer London Boroughs collecting large quantities of compostable garden waste and with lower proportions of flatted premises can reasonably be expected to make bigger contributions. It is clear that levels of waste generation and recycling are connected to inhabitants economic security and prosperity so targets should reflect the socio-economic nature of the borough.
- The Strategy should make it clear how the MoL intends to ensure that the sum total of borough contributions towards achieving improved recycling rates will ensure that his targets are met.
- Applying these targets to municipal rather than household waste may create a perverse incentive for boroughs to increase their competition with privately operating licensed waste carriers providing commercial waste recycling services, thus attracting

more (recycled) waste into the municipal waste stream and making it harder for London to reduce its municipal waste. Presumably this is why the target for waste reduction is limited to household waste only.

- There is no justification for including anaerobic digestion within these targets as its CO2eq performance is on a par with incineration with EfW. It should be excluded from the calculations, with the targets revised downwards to compensate.
- See also comments on Policy 4 and Proposal 4.1 below.

5. The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately:
1.2 million tonnes of CO_2eq in 2015
1.4 million tonnes of CO_2eq in 2020
1.6 million tonnes of CO_2eq in 2031

Comments:

- See also comments on Objective 2 above.
- A commendable objective. We support the change in focus to carbon from weight based targets. However, there is significant doubt about how accurately carbon equivalent emissions can be measured using "WRATE" or otherwise and close analysis of the carbon benefits of some initiatives designed to achieve the Mayor's high recycling targets may indicate little if any benefit from them e.g. the separate collection of food waste for recycling.
- Whilst the draft strategy provides a current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall, it does not provide a borough level breakdown of this figure and the council does not hold this data internally either or have direct access to WRATE or the expertise to calculate it. It is therefore not currently possible for the council to assess the CO2eq impacts of the borough's municipal waste management or the size of reductions likely to be achieved by future changes in how the waste is managed. The Mayor's proposed "ready reckoner" will largely address this (subject to the reliability of the data) but in the meantime it is difficult to assess the contribution the council can make towards the achievement of these targets or the associated financial costs / savings.
- At Appendix 4b, it appears that the current CO2eq annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall excludes collection related impacts. The figure should therefore be presented as a figure for "London's municipal waste disposal and treatment activities overall" or be revised upwards to include collection related impacts. It is important that this should be clear in the main Strategy, as most people will not read the Appendices.
- On page 89 there is a reference to the "…emissions-saving effect of recycling and composting activities." Table 5 on page 92 shows an emissions saving effect for in-vessel composting but not for open windrow composting. It would therefore be helpful to insert the word "in-vessel" before "composting" in the statement on page 89.

6. To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.

Comments:

- This is not a "SMART" target as it is not measurable- how would we recognise the point at which "as much energy as possible" was being extracted? It would be

preferable to set a target in terms of e.g. kilo-joules generated or percentage increase from a baseline.

- If a target is not set in terms of kilo-joules generated or percentage increase from a baseline, then "…a*s much energy as possible…*" should be more closely defined or replaced with "…a*s much energy as is reasonably practicable…"* or similar.
- There is a danger that the Mayor's preference for emerging new technologies over incineration with energy recovery could result in more waste than necessary going to landfill, either because the new technologies fail to deliver as promised or because local authorities are unable to afford them.
- The Mayor's commitment to utilising waste heat from EfW processes e.g. through the provision of district heating ring main piping systems (as exist in Paris and Amsterdam) as detailed at pages 129-130 of the Strategy is welcomed. Realistically however, the prospects of this actually being delivered still seem remote, especially given the imminent demise of the LDA and its central government funding.

To achieve the Mayor's objectives and targets, the strategy will focus on the following six policy areas, each containing a number of proposals:

D. Policies and proposals

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling municipal waste

Comments:

- A commendable policy. However, the costs associated with successful and comprehensive communications programmes should not be under estimated. Resources for achieving this (e.g. for Recycle for London and borough level activities) may prove insufficient to produce a step change in awareness levels, especially in the context of the level of financial savings that local authorities must achieve over the next four years.

Proposal 1.1: Setting waste reduction and re-use targets

Comments:

- See comments on targets 2, 3, and 4 above.

Proposal 1.2: Supporting London-wide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling

Comments:

- A commendable proposal. However, Recycle for London's available funds may well prove insufficient to provide the level of support necessary to ensure the achievement of related targets and objectives contained in the Strategy.
- Recycle for London only has resources allocated until 2013, but targets for waste reduction, reuse and recycling are set until 2031. Substantial support will need to be provided throughout this period if the targets are to be achieved.
-

Proposal 1.3: Reducing the amount of municipal waste entering the waste stream

Comments:

- A commendable proposal.

- The first bullet point under this proposal on page 76 states that "the Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code." According to the definition of municipal waste being used this support will only contribute towards the achievement of municipal waste targets and objectives if it is focussed on businesses whose waste is collected by local authorities.
- The council has pursued effective municipal waste management reduction policies for many years yet still has relatively high arisings. In particular, charging policies which encourage commercial waste producers to utilise privately operating licensed waste carriers are effective at reducing municipal waste arisings. However enforcement activities to squeeze out trade waste illegitimately entering the collected household waste stream (e.g. enforcement against the abandonment of trade waste on street and against domestic collection crews taking back-handers to collect commercial waste) are resource intensive and in the borough are likely to be lost as a result of reducing funding. London wide education and enforcement policies could assist in this achievement
- Revisions to Schedule 2 of the Controlled Waste Regulations may also help to reduce the household element of municipal waste by reducing the price incentive for Schedule 2 premises to utilise local authority waste collection services.
- The ability of local authorities to influence the amount of household waste requiring collection should not be over estimated. There is still a close link between levels of economic activity and waste generation, and waste reduction measures implemented outside the sphere of local authorities will be crucial in influencing the extent to which this proposal is achieved.
- The Mayor's efforts to encourage London's waste collection authorities to collect more commercial waste for recycling will actually attract more waste into the municipal stream.
- The three bullet points on page 76 detailing what the Mayor will actually do to achieve the aims of this proposal all relate to commercial waste. The strategy should contain more detail on how the Mayor intends to achieve the aim of this proposal.
- Proposal 1.3 relates to municipal waste and so is inconsistent with Target 2 which relates to household waste. If the Mayor proposes to reduce the amount of municipal waste entering the waste stream, why not set a reduction target for municipal rather than household waste?
- The Mayor's efforts to encourage packaging and product design that reduces waste should seek to engage with and influence marketing departments as these are often the main barrier to the adoption of lighter weight or more recyclable packaging and also commission large quantities of "direct marketing" (unsolicited junkmail).

Proposal 1.4: Tackling barriers to providing effective reuse services

Comments:

- A commendable proposal. However, a significant barrier to increasing the re-use of items that would otherwise become waste is the relatively low cost of new products compared to the cost of repair and refurbishment. Tackling this barrier is likely to require national action e.g. increased taxes on virgin materials / single use products/ new products and/or tax advantages for second hand goods and recycled products.

Policy 2: Setting a CO2eq emission performance standard for municipal waste management activities to reduce their impact on climate change.

Comments:

- The Council supports this policy in principle but believes that there are a number of significant issues to address before it can be relied upon in practice to reduce the climate change impacts of London's municipal waste.
- The Strategy should make the difference between a "performance standard" and a "target" clear. Other policies have related targets but this one has a performance standard- why? If "performance standards" carry more weight, this should be made clear.
- It should also be made clear whether, unlike the recycling targets contained in the strategy, individual boroughs will be expected to comply with this standard. If so, some boroughs are likely to find it much harder to comply than others according to the proportion of flats they have, the number and size of gardens and whether they have CA sites.
- The data behind the Mayor's standards is based on reports from a single consultancy, without peer group review, and includes some significant assumptions (some in contradiction of Government guidance). The outcome is that the Mayor's Strategy is a high risk/high cost approach and, with no Plan "B", the consequence of failure will be a continued reliance on landfill. The old 'presumption against incineration' continues but the charge that EfW (combustion) would 'crowd out recycling' appears to have now morphed into it will 'crowd out renewable energy'.
- The EPS appears to be set on the assumption that the Mayor's waste reduction and recycling targets will be met. It appears that each London Authority may be required to meet/exceed the EPS, in which case London as a whole would exceed both the standard and the recycling and waste reduction targets. So whilst it is clear that there is no direct requirement on London's individual waste authorities to meet the Mayor's targets, the requirement to comply with the EPS at an individual authority level may force them to do so anyway, at least if this achievable without incurring excessive cost, which is doubtful.
- It should be noted that the MoL's waste Hierarchy is only a guide- "…the scenario that performs best in CO2eq emissions terms should be given preference." (p55)
- For a CO2eq performance standard to be useful, the data for different processing options needs to be reliable. The size of the variations in the figures for kg CO2eq per tonne between Table 2 in the Assembly draft and the Public Consultation draft suggest a high degree of uncertainty may exist. And not all the data in Table 2 matches that provided by Defra on its website at: http://www.defra.gov.uk/environment/business/reporting/pdf/101006-guidelines-ghg-conversion-factors.xls (updated Oct 2010).
- On p53 it states that Table 2 "…shows the potential lifecycle performance of different waste management methods for various waste materials.". However, it appears that the figures take no account of the additional collection impacts involved with collecting different material streams separately (e.g. additional vehicle movement, slop buck and caddy liner related impacts). The Strategy should make this clear. These impacts may have a significant effect on which option is identified as having the lowest lifecycle impacts and excluding them will only encourage solutions with high collection related impacts to be adopted. That could have serious implications for London's air quality and traffic congestion.
- On page 95 it is stated that "Emissions from transport usually contribute a relatively small proportion of the total emissions from waste management activities (approximately 5-10%). This figure sounds surprisingly low and the source and basis for this figure should be quoted.

- On p54, Table 2 now excludes the "incineration (generating electricity only)" column that was included in the January 2010 draft- why has this been removed? Its inclusion highlighted that this is the most carbon friendly option for organic waste including "garden/plant waste", "wood waste" and possibly "mixed waste". Adding a further column to the table for Incineration as a disposal option (low energy recovery efficiency) and a recovery option as defined by the 2008 Waste Directive could highlight how incineration processes with high energy recovery efficiency might be the best option for other waste streams too e.g. food waste.
- It would also be helpful if Table 2 split composting into "home" and centralised".
- It should be noted that, even without heat recovery via the provision of a district heating ring main, the Belevedere EfW incinerator is classed as a "recovery" process under the 2008 Waste Directive. It is "CHP enabled" and MoL's support for the establishment of a district heating ring main to utilise this is welcomed. Additionally, by accepting waste deliveries by river barge it will help keep around 100,000 lorry movements off the roads annually and will make a substantial contribution towards London's ability to meet LATS targets. The Strategy's lack of recognition of the specific contribution the Belevedere facility will make towards the achievement of important waste management goals and the contribution incineration with EfW plants could make in general is notable and appears to be based on little more than prejudice against incineration with EfW facilities.
- The 2008 Waste Directive gives, at Annex 11, item R1, the energy efficiency standards which make incineration a "recovery" rather than "disposal" option. The Mayor's strategy should reflect this categorisation.
- On p92, the reference to "Table 6" in the text should read "Table 5".
- On p97, it is unclear what the difference between the two "electricity only" rows for incineration is.
- It should be noted that the boroughs will bear the full costs of achieving compliance with the EPS, but a significant proportion of the theoretical income from achieving it will not return to them (e.g. the "monetised CO2 benefits").
- See also comments on Appendix 4a below.

Proposal 2.1: The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO_2eq savings.

Comments:

- "Greatest possible" is open to interpretation and should be more closely defined. The greatest possible CO2eq savings are only achieved once all waste has been eliminated and as more waste is moved up the hierarchy, the marginal cost of moving further waste up the hierarchy is likely to rise, eventually to a point where to do so does not represent a cost-effective environmental gain. "Greatest possible" should perhaps be replaced with "substantial".

Proposal 2.2: Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO_2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Comments:

- The statement that "The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost." is confusing. It is unlikely that it could be set at a level which achieves both and it is unclear how the EPS would take account of cost information.
- See also comments on Target 5 and Policy 2 above.

Proposal 2.3: In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.

Comments:

- Any minimum CO2eq performance standard for energy from residual waste should be set at a level so as to ensure that processes classed as "recovery" under the 2008 Waste Directive are generally able to comply with it.
- There is no disagreement with the principle that London's municipal waste, used for energy generation, should have a carbon intensity less than, or equal to, the source of energy generation it displaces. The concern is that the Mayor has decided that it is energy generated by "combined cycle gas turbine (CCGT) plant" which will be displaced. CCGT is very efficient and is assumed to generate electricity at a carbon intensity of 387grammes CO2 per kilowatt hour (CO2/kWh), this compares with a national grid mix of around 517g CO2/kWh. In reality, EfW will displace coal fired power stations (around 40% of the grid mix) which produce over 900g CO2/kWh and will struggle, by a 2015 deadline, to comply with the EU's 'Large combustion plant directive'. A reliance on power from imported gas also leads to concerns on the security of national energy supplies. This bench mark is based solely on this one study which underpins the strategy. The implications are so important that there must be time to evaluate the study and its conclusions if for no other reason than to ensure that there is a very firm basis for the Mayor's reliance on one option which has no Plan "B". There are organisations that serve London that have the expertise to provide the "challenge" and time must be allowed for such a challenge.
- The Mayor expects Belvedere to operate at a carbon intensity of 400+g CO2/kWh therefore even the most modern waste combustion plants (despite being classified as Recovery operations under the Waste Framework Directive) will not be able to meet this standard unless developers can find ways to use the heat as well as the electrical output. Work by the LDA and ODA demonstrates the difficulty of securing heat distribution and the Renewable Energy Association is concerned that making it compulsory could be raising the bar too high. The Government view is that the principle purpose of waste combustion is simply to reduce the amount of waste going to landfill. The Mayor has made no consideration of the costs of meeting his 'carbon intensity' floor and his preferred technological solutions anaerobic digestion, gasification and pyrolysis are unproven (DEFRA's New Technologies Demonstrator Programme provides evidence), and consequently difficult to finance despite £millions in Government subsidies being available. Additionally, AD is only able to deal with a proportion of the waste stream.
- The EPS assumes energy will be recovered from 'low carbon' waste sources (e.g. food, via his preferred but unproven technology mix) coupled with increased recycling of fossil fuel based materials such as plastics and textiles. The Mayor's consultants acknowledge this could lead to a requirement for separate food waste collections, kerbside sorting of recyclables (associated traffic congestion) and, to help balance the costs, fortnightly residual waste collection. The financial costs of meeting the EPS will

fall entirely on the boroughs but significant elements of the income will not return to them as a large proportion will be retained by private sector providers, some will simply not materialise at all (no account of the volatile nature of the materials market appears to have been taken and the strategy is dependant on optimistic prices and markets for recyclable materials remaining constant) and notional benefits, such as the 'monetised' value of Greenhouse Gas Emissions, will not translate into cash in borough coffers.

- The Mayor's advisors have admitted that London boroughs are not currently meeting the EPS, and changes will be required, but no evidence of what this will cost has been provided. Local authorities will not have the resources to provide any waste service that is not based on good economic grounds. There are no data that is currently available that provides evidence that extracting energy from food and green waste is less beneficial in all the circumstances that recycling, yet the Mayors strategy is forcing councils to provide these recycling services on the basis that the carbon saving is significant and therefore there is an overall cost saving.
- The consultants report makes it very clear that unless the so called "best practice" is adopted such as AWC and kerb-side sorting then none of its modelling is reliable. Many authorities in London, particularly in Inner London, will not be able to adopt this best practice. The Mayor must consider the reality of London and ensure that landfill is avoided energy is recovered and recycling is encouraged without London incurring costs it can ill afford at this time.
- The Strategy should recognise the time lags involved with procuring waste disposal facilities and their long operational life spans. The Belevedere EfW incinerator was originally planned in the early 1990s, will start operating in 2011 and will have a c. 30 year lifespan. As such, its procurement pre-dates the carbon agenda and, district heating networks and increased diversion of e.g. plastics aside, it would be unreasonable to expect WLWA to "…have steps in place to meet (the EPS) in the near future." In practice it is likely that this could only be achieved at excessive cost. The requirement to comply with CO2eq performance standard for energy from residual waste should be qualified to exclude facilities which have already been procured and to which disposal authorities are contractually bound for years.
- Energy from waste cannot be assumed to be replacing other energy sources- it may be additional to existing capacity.

Proposal 2.4: The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO_2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO_2eq performance for energy generation.

Comments:

- A commendable proposal although the more simplified any tool is, the less accurate it is likely to be. And any tool can only be as good as the data behind it, but the range of different CO2eq performance figures for different processes across different data sources and the regularity with which the data gets updated and changed casts significant doubt over how reliable any such tool could be.
- This may help to keep the monitoring and reporting burden to an acceptable level.

Proposal 2.5: The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Comments:

- A commendable proposal. However, by failing to take full account of collection related impacts (e.g. in Table 2) the Mayor may inadvertently encourage adverse impacts on London's air quality by encouraging collection intensive solutions.

Proposal 2.6: The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

Comments:

- A commendable proposal (subject to details of FORS).
- It should be noted WLWA already use one of the most sustainable methods for transporting waste, but this could be threatened by objective 4.

Policy 3: Capturing the economic benefits of waste management.

Comments:

- A commendable policy.
- On page 103 it states that "*The Mayor will work with London's waste authorities …. to ensure that London is taking steps to maximise the economic benefits to London from its waste management."* It would be helpful to expand upon this statement to indicate the types of action by the waste authorities that the Mayor envisages to achieve this aim.
- See also comments on objective 3 above.

Proposal 3.1: Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Comments:

- A commendable proposal. However, London's waste authorities should not be arm twisted by the Mayor into utilising the efficiency opportunities he has identified- If they are sufficiently attractive the opportunities will be taken up regardless.

Proposal 3.2: Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Comments:

- A commendable proposal. However, again, London's waste collection authorities should not be arm twisted by the Mayor into utilising his framework contracts- If they are sufficiently attractive they will be utilised regardless.

Proposal 3.3: Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Comments:

- A commendable proposal. However, again, London's waste authorities should not be arm twisted by the Mayor into utilising his framework contracts- If they are sufficiently attractive they will be utilised regardless.
- Clarity could be added by inserting the word "disposal" before "authorities".

Proposal 3.4: Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling1 and closed loop recycling.

Comments:

- A commendable proposal. However, LWaRB's available funds are limited compared to the scale of the Mayor's ambitions.

Proposal 3.5: Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

Comments:

- A commendable proposal although private ownership will often be more advantageous.

Policy 4: Achieving high recycling or composting rates resulting in the greatest environmental and financial benefits.

Comments:

- This is how the policy is given in the Executive Summary, but the main body of the strategy (at page 113) excludes "resulting in the greatest environmental and financial benefits".
- For the most part, it is unlikely that any single approach would result in both the greatest environmental benefits and the greatest financial benefits- there will often be a trade-off between the two. As it stands, it is unclear whether this policy supports measures the achieve environmental benefits through recycling at a net financial cost. This policy would therefore be clearer if it were amended to "Achieving high recycling or composting rates resulting in the greatest environmental at acceptable financial cost."
- There is a significant risk that forcing waste collection authorities to chase high recycling targets would result in greatly increased collection costs for little or no environmental benefit.
- Table 4 on page 116 contains a duplicated column for 2008 data.
- See also comments on Target 4 above.

Proposal 4.1: The Mayor will set recycling and composting (including anaerobic digestion[1]) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031.

Comments:

- On page 114 it states that achieving 60% recycling could save "…*about £60 in waste collection and landfill disposal costs each year."* However, it would only reduce landfill disposal costs in boroughs relying on that method of residual waste disposal
- It is difficult to see how the proposed route from 25% to 60% recycling as illustrated in Figure 18 could be applied to the council as:
- Whilst composted parks green waste may count towards municipal waste recycling targets in theory, the most eco-friendly and cheapest option is usually to compost it on-site within the park, which usually means it isn't weighed and falls outside the measured municipal waste stream.

- The text below Proposal 4.1 on page 117 is confusing- Where recycling and composting delivers the best economic and environmental outcomes, surely local authorities will be inclined to consider this before energy generation even in the absence of the Mayor setting high recycling targets? And wouldn't it make more sense to say that, where energy generation and recycling/composting have similar performance in environmental terms, cost should be the deciding factor? And if cost related considerations can over-ride the Mayor's Waste Hierarchy, this should be clearly stated in Chapter 4 as is the ability for CO2eq considerations to over-ride it.
- See also comments on Target 4 and Policy 4 above.

Proposal 4.2: The Mayor, through the London Waste and Recycling Board's best-practice coordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Comments:

- A commendable proposal. However, London's waste collection authorities should remain free to determine the design of the recycling services that they consider to be most appropriate for their borough.
- Households without gardens, which account for a substantial proportion of the total, will not have much use for composting services for garden waste.
- On page 117 it suggests that boroughs with a high proportion of flats should consider investing in residual waste treatment facilities, including "dirty MRFs". Whilst this may be a valid statement, if there is a question mark over the long term viability of co-mingled collections due to recyclate quality issues, there must surely be a bigger question mark over the quality of recyclate from dirty MRFs. It might be good to qualify this statement with something like "subject to recyclate quality issues".
- On page 118 it is noted that "…it is difficult to present an accurate assessment of London borough collection costs…". It appears that the Strategy consistently underestimates the likely additional collection cost implications of achieving very high recycling rates.

Proposal 4.3: The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Comments:

- The council already does this, but no small businesses have requested the service due to relatively high (but nevertheless reasonable) service charges.
- The Council has lobbied for the collection and disposal of SME waste to be funded through business rates, with local authorities as the sole collectors. Whilst this would increase the overall quantity of municipal waste along with associated impacts, it would reduce the collection impacts associated with London's waste overall (by replacing numerous different private collectors all servicing different premises with a single vehicle with a much more efficient collection route. It would also enable local authorities to offer SME waste collection and recycling services at low cost.
- In the absence of the above change, there is no reason to think that local authorities are in a better position to provide small businesses with recycling collection services

than privately operating licensed waste carriers, unless they co-collect household and commercial waste.

- Waste Collection Authorities must normally recharge the full cost of collecting and disposing of commercial waste back to the producer, but boroughs wishing to secure a high proportion of the SME waste and recycling collection market may be tempted to under-price their services in order to compete with private sector operators, effectively getting their domestic Council Tax payers to subsidise commercial waste services.

Proposal 4.4: The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Comments:

- A commendable proposal. However, spread across London, this equates to around £150k per borough and is unlikely to prove sufficient to achieve the four fold increase in flats recycling by 2031 or the 3.5 fold increase by 2020 envisaged in Table 8.

Proposal 4.5: The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Comments:

- A commendable proposal.

Proposal: 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Comments:

- Incentive schemes for recycling in the UK are still in their infancy. Their cost effectiveness along with extent of the role they can potentially play in achieving higher rates of recycling is still unclear, especially in the context of flats with communal waste storage and services already achieving high capture rates. It is also unclear how much of the increase in recycling observed with such schemes can be attributed to the existence of the incentive and how much actually relates to the high level of publicity promoting the incentive scheme.
- Recycling incentive schemes are liable to attract more waste into the system, especially if applied to garden waste, with large disposal/processing costs attached. Additional waste can be diverted from elsewhere (e.g. home composting) or occur as a result of the additional consumption stimulated by use of incentives in the form of money off vouchers.
- Incentives should therefore only be provided for demonstration of waste reduction.
- Subsidies for residents to purchase home composting containers or wormeries may well be the most effective form of incentive and can help to reduce the quantity of waste entering the household and municipal waste streams.

Proposal: 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Comments:

- Whilst limited networks of on-the-go recycling facilities for newspapers and magazines can be provided at acceptable cost, more intensive schemes catering for packaging containers tend to have very high collection costs as containers must be small to fit on-street and the packaging is low density, so the containers must be emptied very

regularly but produce low tonnage per collection. They also tend to suffer from very high levels of contamination.

Proposal 4.8: The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Comments:

- A commendable proposal, but the wording could perhaps be improved e.g. *The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection and recycling service information and performance data across all London boroughs.*

Proposal 4.9: The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

Comments:

- A commendable proposal. There is strong evidence that this is the approach that would achieve the highest possible recycling rates for this material. However, diverting this recyclable material from the household waste stream would make the achievement of high municipal waste recycling targets harder, so if a deposit scheme is introduced the Mayor should consider an appropriate associated reduction to his targets.
- By increasing the purchase cost of soft drinks and bottled water, consumption of these products could be expected to fall, producing an associated environmental benefit plus a health benefit in the case of sugared soft drink consumption.

Policy 5: Catalysing waste infrastructure, particularly low carbon technologies

Comments:

- A commendable policy. However, accurately forecasting future needs in terms of both tonnage capacities and the appropriate split of treatment technologies is inherently difficult.
- LWaRB's remaining funds for catalysing waste infrastructure are limited.
- On page 129 it states that "*The Mayor …. will work with waste authorities …. To develop municipal waste infrastructure in London*." It would be helpful to expand upon this statement to indicate the types of action by the waste authorities that the Mayor envisages to achieve this aim.

Proposal 5.1: The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure.

Comments:

- A commendable proposal.

Proposal 5.2: The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies.

Comments:

- Due to the high costs and environmental impacts of separately collecting domestic food waste, the Food to Fuel Alliance backed exemplar projects mentioned on p136

would probably achieve more CO2eq benefits if fed with waste from London's commercial food outlets.
- See also comments on Policy 5 above.

Proposal 5.3: The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan.

Comments:

- See comment on Objective 4 above.

Proposal 5. 4: The Mayor through TfL, will encourage the movement of waste via sustainable modes of transport.

Comment:

- A commendable proposal. Comments regarding travel by rail have been provided already.

Policy 6: Achieving a high level of street cleanliness

Comments:

- A commendable policy which is nevertheless ultra vires. This part of the strategy should be extracted into a separate non-statutory document or be treated as an appendix to the strategy, making it clear that it does not fall within the Mayor's municipal waste powers.
- Restricting this policy to "street cleanliness" excludes other public open places such as parks, open housing estate land and commercially managed open public areas. References to "street cleanliness" should be replaced with "cleanliness of public open places".
- It should be noted that the Council has not received any additional Olympic or other external funding to enable it to achieve higher standards of cleanliness for the Olympics. Recent borough-level education and enforcement initiatives are believed to have helped improve recent performance and data suggests that the borough is getting cleaner. However, whether the further significant improvements the Mayor wishes to see for the Olympics can be achieved whilst the boroughs are under severe financial pressure to reduce spending on major services such as street cleansing remains to be seen.
- On page 144 it is suggested that the increased provision of "on-the-go" recycling bins will make littering "increasingly unacceptable" however they are unlikely to be any more effective in preventing litter than litter bins, the provision of which is already widespread.
- The proposals backing this policy are not sufficiently extensive to ensure that this policy results in a significant improvement to the cleanliness of London's streets or other public open places.

Proposal 6.1: Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Comments:

- A commendable proposal (which effectively endorses "Love Clean Streets").
- On page 144 it is suggested that this will save London boroughs money and reduce the number of reporting channels and back office costs. In reality it will actually be an

additional reporting channel for the foreseeable future. (Love Clean Streets can only be used by those with mobile phones, currently excluding Blackberries, who have downloaded the application. At what stage will enough residents have downloaded it for it to become acceptable for us to stop accepting cleansing related complaints and service requests via telephone/email/web-site/letter/in person? Realistically, that is not an immediate prospect.)

- The extent to which Love Clean Streets would divert reports from existing channels or create additional reports/contacts is also unclear.

Proposals 6.2: Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Comments:

- A commendable proposal.

Proposal 6.3: Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Comments:

- A commendable proposal. However, it is unclear what form this encouragement might take (Is this a reference to support from LWaRB?). It would be good to provide detail on the likely form of encouragement that would be available.
- The council will be looking to build on the current separation of leaves, when this service is operated by within a PFI contract commencing in 2012. Specific targets for the contractor have been set.

Proposal 6.4: Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Comments:

- See also comments on Proposal 4.7 above.
- The primary responsibility for dealing with waste from London's events normally lies with the event organisers as it is their own commercial waste. The council already works with many of these organisers to provide recycling facilities. Although capacity to do so is tied to a limited number of events.

Proposal 6.5: Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, in advance of the Olympic and Paralympic Games.

Comments:

- A commendable proposal. However, volunteer clean up activities are best suited to those bits of land for which there is no clear cleansing responsibility and which get neglected as a result. Encouraging volunteer clean-up activities on land for which local authorities have a duty to keep clean (public highways) or other relevant land which they must keep clear of litter and refuse (e.g. parks and open housing estate land they manage) could be interpreted as an admission that their arrangements for doing so are inadequate.
- To ensure that London's streets are as clean as possible over the Olympic period the Mayor should seek to secure Olympic funds to enable the boroughs to provide enhanced cleansing services in the run up to and during that time.

Proposal 6.6: Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Comments:

- The environmental benefit associated with introducing such a ban is questionable, although it may have wider impacts on behavioural change due to their iconic status.

Proposal 6.7: Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting non-stick and degradable gum in London.

Comments:

- A commendable proposal. However, this is a national problem which may require a national solution.
- An alternative approach would be to encourage or force the adoption of improved gum packaging, incorporating wraps and a pouch for discarded gum, as in use in Japan and as produced locally by Peppersmith.

Proposal 6.8: Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Comments:

- A commendable proposal. However again, this is a national problem which may require a national solution.
- Encouraging or forcing tobacco manufacturers/retailers to supply butt pouches free of charge to smokers at the point of sale might be an effective way forward.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum litter for London in the years leading up to 2012.

Comments:

- A commendable proposal.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

Comments:

- A commendable proposal.
- The Mayor may wish to investigate the feasibility of providing "exchange" containers on underground trains or stations for passengers to place newspapers and/or books that they have finished with in for others to read.

Other comments on the main document

- The national data behind Figure 1 (Page 29) should be replaced with London specific data (e.g. that used by Eunomia- see Appendix 4a para. 2.3.1. or, if it exists, separate data for outer and inner London). This would help to confirm the achievability of the Mayor's proposed recycling targets.
- In reality, the statement on page 46 that "…*London could save between £573 and £838 million by 2031*" (by complying with the Mayor's proposed Strategy) is unlikely to be accurate. This equates to annual borough savings of around £0.8 - £1.2 million,

but the cost of providing enhanced recycling services to achieve the Mayor's targets would be likely to exceed this.

- Significant doubt exists as to whether the procedure adopted by the GLA in revising the Mayor's strategy complies with requirements under the GLA Act.
- The Mayor should clarify his view on the extent to which London's local authorities need must comply with the detailed policies and proposals contained in the strategy to be deemed to be acting "in general conformity" with it.
- The Mayor should amend the Strategy so that it is fully compliant with the 2008 Waste Framework Directive and uses the same definitions of terms used in it. For example, in the mayor's Waste Hierarchy, "prevention or reduction" could be simplified to "prevention" as the EU definition includes "reduction" not to mention "re-use". "Re-use" should be "preparing for re-use" as this refers to recovering items from waste, repairing etc for re-use. The term "re-use" by itself is covered by the term "prevention". "Recycling or composting (including anaerobic digestion)" should be simplified to "recycling" as the EU definition includes composting. However, anaerobic digestion is a recovery treatment, not recycling. Both "Treatment of waste through energy generation, producing electricity and using waste heat" and "Treatment of unsorted waste through energy generation, producing electricity only" could be recovery options if they are sufficiently energy efficient or disposal options if they are not. It would be much better to split these options according to the EU definitions of recovery and disposal, relating to the efficiency of energy recovery. "Disposal of waste to landfill" should be simplified to "disposal" alone. This may mean that some data needs to be adjusted to match the EU terminology.
- The deadline for consultation responses should be extended until some weeks after the Government announces the results of its Review of Waste Policies.
- The draft revised strategy takes insufficient account of the financial squeeze on local authorities. Achievement of the proposed recycling and CO2eq targets is likely to have substantial and possibly excessive costs attached. And it is unclear whether any given level of cost could become "excessive" as the financial squeeze on local authorities gets tighter.
- The Mayor's Strategy should use the definitions given at Article 3 of the 2008 Waste Directive.
- The focus on re-use within the Strategy is to be welcomed. However, re-use prior to collection by WCAs (e.g. via "Freecycle") should be considered as something that sits above the Waste Hierarchy rather than within it as it happens to goods before they become waste.
- The wording of policies and proposals should be consistent throughout the document but often differs between the contents of the blue summary boxes at the start of each chapter and where the full detail is provided.
- It is unclear why the Strategy should seek to encourage more commercial waste into the municipal waste stream. The appropriate place to provide strategy for commercial waste that isn't already municipal waste is the Mayor's draft Business Waste Management Strategy.

Comments on Appendix 3

- Table one shows that PFI funded projects are expected to make up 32% of total processing infrastructure capacity. It is unclear how the Mayor expects to achieve zero waste to landfill now that London's waste PFI funding has been cancelled. Defra have stated that PFI funded capacity will no longer be needed to meet EU landfill

diversion targets for 2020, so it seems that Defra accepts that London may need to rely on landfill or other disposal capacity outside London and that Defra does not support the mayor's proposed regional self sufficiency. London's best option may be to purchase LATS permits.

Comments on Appendix 4a

- **(Page 77-9.5 All Schemes to Weekly Refuse Collection):** It appears that according to the Mayor's modelling, achievement of the proposed high recycling targets is dependent on reducing the frequency of residual waste collection below weekly. This is something being considered by the council, however with concern over the conflict that may be caused as a result of recent high level national press on the matter.

Comments on Appendix 4b

- **(Page 4-72.1.1 Determination of Baseline CO2e Performance):** The exclusion of emissions from waste collection related transport biases the strategy towards favouring solutions with high collection related carbon impacts but low downstream processing impacts and may result in waste authorities calculating CO2eq impacts/savings which exceed those achieved in reality.
- **(Page 4-72.1.1 Determination of Baseline CO2e Performance):** As NI 185 has now been abolished, this incentive for local authorities to reduce their transport related impacts no longer exists.

Key Comments

- A complete review of national policy on waste is currently being undertaken, which includes detailed work on a number of areas such as the transposition of the revised Waste Framework Directive and a proposed repeal and replacement of the Controlled Waste Regulations. **The Mayor's decision to consult on and publish his own regional strategy before new national policy is finalised is premature**, and he should consider suspending this project until the Secretary of State for Environment, Food and Rural Affairs has announced her new policy framework for waste.

- Furthermore, the Mayor needs to ensure that his strategy fits properly with European and national policies, and should not seek to impose further burdens or complications on local authorities. The proposed waste hierarchy is an example, as it differs from that which has been set as part of the revised WFD. The Mayor should revert to using the hierarchy set in the latter (prevention > preparing for re-use > recycling > other recovery > disposal) to ensure there is consistency between European, national and regional policies.

- The Mayor has proposed targets on both recycling/composting and carbon. The imposition of such targets puts a significant additional burden on local authorities at a time when budgets are being drastically cut, and especially in light of Government's decision to withdraw PFI credits to support the development of new technologies and facilities.

- The recycling/composting targets that the Mayor has set are particularly challenging for an urban area like London. There is less garden waste generated in the capital than in other parts of England, and a higher proportion of domestic properties are flats, which means there is less recyclable/compostable material available and capturing it is considering harder. Although it is admirable that the Mayor wants London to contribute to national targets as much as possible, he needs to be more realistic about what is actually achievable in a large city, particularly when little funding for service development and communications is available.

- The Mayor should be commended for seeking to raise the importance of carbon in waste management, but the Emissions Performance Standard needs to be tested for a period prior to a separate consultation on its more widespread introduction. **The EPS should therefore only be expected to be used as an advisory tool for the London boroughs at this stage, and should not be imposed as a mandatory standard**.

- The Mayor needs to recognise that Government is intending to change the role that local authorities play by putting a greater emphasis on individuals and communities, and he needs to acknowledge this new national policy in his approach to increasing recycling/composting and tackling litter. Many London boroughs are already running comprehensive recycling services and investing significant sums in street cleanliness, so the Mayor needs to consider a greater focus on changing the behaviour and perception of residents to achieve his intended outcomes.

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. **What do you think are the key issues that need to be addressed in order to achieve this vision?**

- The Mayor should be commended for wanting to make London a world leader in municipal waste management, but needs to ensure he is being realistic in his ambitions and judging London by an appropriate standard. As a large and diverse city with a highly transient population, a multitude of cultures and languages, notable levels of deprivation alongside extraordinary examples of affluence, ageing building stock and significant land use pressures, and an increasingly overstretched utilities and transport network, the challenges facing London in achieving the Mayor's vision are considerable. London cannot be expected to meet the levels of performance that may be reached in much smaller or newer urban areas, but can aspire to become an environmental beacon for the world's great urban centres.

- The Mayor is launching this strategy at a time of massive reductions in council budgets, which will severely restrict the possibilities of investment in services and corresponding communications. The Mayor has made funding available for some capital projects through LWARB, but this has been offset by Government's withdrawal of PFI credits for two London waste partnerships. Similarly, Recycle for London is well funded until 2012, but this will not be sufficient to fill the vacuum left by the inevitable reductions in council budgets for communications.

- Senior members of the new coalition government have made pronouncements on waste policy that are ill-informed and unhelpful, particularly as local authorities try to find ways to make cuts to their budgets while continuing to increase recycling performance. The types of service changes that some authorities are proposing have proven to be effective when introduced elsewhere, and it has been demonstrated that continual and well-designed communications are essential to the successful delivery and operation of a waste collection scheme. A key issue that needs to be addressed is therefore to educate Government ministers and encourage them to support local authorities in effectively managing municipal waste, rather than introducing additional barriers.

- A focus on reducing waste is much needed in efforts to fight climate change and reduce the use of natural resources, and it is encouraging that the Mayor sees this as a priority. However, it needs to be recognised that the manufacturing and retail sectors have the greatest potential to influence how waste is generated, both in terms of the design of their products and the methods used to market them to consumers. The Mayor is in the strongest position within London's political system to engage with and influence this commercial sector to ensure that a reduction in consumer waste generation is integral to economic growth plans.

- The Mayor needs to recognise that planning regulations and local opposition are major obstacles to the development of new waste treatment facilities, so any greater push towards energy generation will need to be given the necessary time and political support to overcome such obstacles.

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. **Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?**

- The Council broadly agrees with these objectives.
- The Mayor needs to define the scope of "Londoners", and also "knowledge, infrastructure and incentives", in his first objective, so as to demonstrate his interpretation of what role the manufacturing and retail sectors have in reducing waste, as well as increasing the possibilities for reuse, recycling and composting.
- It would be appropriate to fully embrace and emphasise the waste hierarchy by amending the end of the first objective to "…and to recycle or compost as much of the remaining material as possible".
- The Mayor needs to give consideration to the full environmental impact of his last objective, as investing in waste infrastructure in densely populated urban areas may result in smaller, less efficient facilities that are not optimised to their full potential. Indeed, the characteristics of an urban setting may preclude the development of certain types of waste technology that may in fact be more appropriate for treating London's municipal waste. Although there may be pressure from neighbouring counties for London to manage more of its waste, these rural communities need to recognise the economic benefits that London brings to them, and that they therefore have a role to play in supporting the ongoing functioning of the capital. A significant number of people commute into London on a daily basis for work, thereby contributing to the generation of municipal waste arisings that the London boroughs need to manage, and it is therefore appropriate for the neighbouring counties to continue to play a role in the treatment and disposal of this waste given the greater availability of suitable sites for the development of facilities.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision

Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy

The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

- The Mayor's target for waste reduction is of concern to the borough, as it appears to be based solely on recent trends in levels of waste being generated. Little regard seems to have been given to the challenging economic climate that the country has been in for some of this period, which is likely to have had a significant impact on consumer behaviour and could therefore be responsible for a sizeable proportion of the reduction in waste. The implication is obviously that as economic conditions improve, residents will return to previous consumer patterns.

- The Mayor has not indicated how he expects local authorities to be able to deliver against these targets, given the challenging circumstances that they are now facing. Very little money will be available to communicate with residents on these types of issues, and even if it were it is likely that the launch of such campaigns would result in further unhelpful comments from Government ministers who do not appear to have an understanding or belief in the importance that effective communication plays in reducing, reusing and recycling waste. The Mayor either needs to remove the burden of these targets from local authorities at this time, or demonstrate how he intends to use the resources and influence he has to deliver against them.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

- Reuse organisations have often relied upon financial and goodwill support from local authorities, which may no longer be available as Government spending cuts reduce councils' flexibility. It is also unlikely that local authorities that are procuring new waste collection contracts will be able to siphon off bulky waste services to reuse firms, as this could cost more overall.

- Reuse firms will need to adapt their services to be more commercial, and there may not be a sufficient skills base within that sector to enable these organisations to successfully compete against larger retail firms. It is therefore essential that the GLA and LWARB adequately support LCRN in this regard, as local authorities will no longer have the resources available to fill that gap.

- Reuse firms represent an employment base within London that needs supporting, but the Mayor needs to recognise the collective marketing power of larger retail firms that will be importing many of the items they sell. The Mayor needs to ensure that the communications resources over which he has control are adequately directed towards ensuring that consumers in London are aware that there are alternatives to purchasing new when seeking out good quality items.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

- The major retail chains have instigated resource efficiency drives, both to achieve cost savings but also to meet the targets they have set themselves through their Corporate Social Responsibility programmes (some of which are linked to WRAP's Courtauld Commitment). The Mayor should use his influence to encourage these firms to play a role, particularly with those smaller businesses that form part of their supply chain.

- The Mayor needs to consider how he can support and work with WRAP to deliver regional improvements in resource efficiency for SMEs, particularly given the reduced capacity that this organisation now has following changes to the funding it receives from Defra. If the Mayor is committed to supporting London businesses then he may wish to consider financing a London-specific role through WRAP, similar to that which has been created in the organisation's Local Government Services team to help deliver the Recycle for London programme.

6. Any further comments on this policy?

- This policy is directly linked to communications activities on waste, and yet this is an area that senior members of Government have focused on as being a misuse of public finance, despite all evidence being to the contrary. If the Mayor is truly committed to delivering against this policy then it would be prudent for him to informally extend the categories of those that need to be informed about the 'value of reducing, reusing and recycling' to include national policy makers and media representatives, in order that the work that is done on this area is not immediately undermined by unhelpful, ill-informed and yet widely reported pronouncements from Whitehall.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced**.**

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. **What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?**

This policy presents some very real concerns for the council:

- Tonnage-based targets have been retained in this strategy, which means that the performance management burden on local authorities in relation to waste has massively increased at a time when central government has pledged to strip this away.
- A CO2 equivalent approach is also somewhat at odds with the tonnage-based approach, as affordable solutions to deliver on the latter may not score well on the EPS. The Mayor needs to establish which area is his priority, ensure that this is in line with central government policy following the Waste Review, and then abolish one of the sets of mandatory targets.
- The Mayor needs to recognise that the options available to local authorities in the development of the most carbon-efficient waste technologies have been reduced, both by spending cuts and the withdrawal of PFI credits.

8. **Any further comments on this policy?**

- This is an untested approach being forced onto London boroughs at a time of unprecedented financial cuts, and during a period when the future direction of national policy is far from clear. Although it is admirable that the Mayor is attempting to bring climate change to the fore of his waste policy, The council **strongly** opposes the EPS being introduced in the manner proposed until the approach has been tested and local authorities have been given time to reshape their services in response to the funding cuts.

- The EPS should be used as an advisory tool for local authorities until such a time as it has been properly tested. A further consultation should then be carried out prior to any introduction of a mandatory standard.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. **What do you think are the key issues in establishing joint procurement contracts for waste authorities?**

- The council, like all local authorities, should work to provide the best possible services for residents. In times of increased economic pressure and with staffing levels under constant pressure, it is paramount that we maintain focus on what is happening within our local area. The current fiscal situation means those demands are even greater, with the need to focus on achieving efficiencies whilst striving to improve service quality.

- Whilst the council is not in the position to enter a joint procurement exercise, (as it is currently in the final stages of procuring a new Integrated Waste Managment Contract), there are a number of considerations and issues that the Mayor may wish to consider when reviewing the feasibility and benefits of establishing joint procurement contracts.

- The practicalities of existing contractual arrangements need to be considered prior to establishing joint procurements, for example start and termination dates.

- All partners involved in undertaking joint procurements need to work in an atmosphere of collaboration, however the issue of local authority cultures and different levels of service and performance delivery need to be considered when initiating any procurement exercise. Furthermore, difficulties of working together to establish partnerships at all levels, including identifying shared objectives and outcomes needs to be addressed. For such procurements to be successful it takes commitment and a willingness to negotiate towards establishing a common approach.

- Supporting this is the need to develop and work within existing governance structures, which are sympathetic to individual need. Working together relies on establishing a firm joint political resolve to ensure that joint working is successful.

- Financial constraints raise a number of issues that need to be considered; resources need to be identified and agreed by all parties from the outset. Complexity of financial arrangements and pressure on individual authorities to optimise their individual financial position may have further impact on such arrangements.

10. **What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?**

- The current processes for allocating LWARB funding do not make this stream particularly accessible for local authorities, which means that it cannot function well as a replacement for the withdrawn PFI credits and other financing routes. A revision of these processes would therefore be welcomed, or funding pots set aside specifically targeted to local authorities.

- The existing planning policy framework makes it extremely difficult and time-consuming to develop new waste facilities, particularly in urban areas. The Mayor will therefore need to ensure that such frameworks are functional, he will need to support planning applications submitted by waste authorities for such facilities, and he will also need to recognise that the delivery of new facilities will take several years.

11. **Any further comments on this policy?**

No further comments.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

- The term 'straightforward' implies that this vision is primarily linked to the provision of recycling services by local authorities and, to a lesser extent, private waste contractors. However, the challenge being faced over the next few years is, in many areas, more related to behavioural issues, namely making recycling and composting an 'integral' or 'basic' part of Londoners' lives. Recycling services in the capital are now fairly comprehensive and increasingly convenient, so the issue is around increasing resident participation in those services. For instance, in the borough we have introduced recycling services for a wide range of materials for all residents, regardless of which type of property they live in, and these services are equivalent or more convenient to use than existing refuse collections. Recycling is therefore straightforward from a service provision perspective, but residents themselves need to take the next step and start using the service.

- A key barrier to making composting a straightforward part of all Londoners' lives is the physical challenge of providing such services to residents in flats. Introducing on-site 'home' composting using standard bins or wormeries is relatively simple (albeit requiring space to be allocated in communal areas or on balconies), but extending the range of materials that can be composted to include food waste makes matters more complicated. Food waste collections from flats are expensive to set up and provide on an ongoing basis, and yet experience in other London boroughs has shown that they are generally not well used. On-site treatment options (such as rocket composting, mini-AD etc.) come with a large capital bill and significant ongoing revenue cost.

- Businesses obviously need to be included as producers of waste, and a key barrier here is the regulatory and legislative framework governing municipal waste collections. The need to distinguish between household and commercial waste, and the requirement to charge for the latter, can make it logistically difficult for local authorities to implement the same level of service to businesses as they do for residents, and the added dimension of private waste contractors providing many of the commercial waste collections means that councils do not have full control or oversight of these services. The Mayor will not have the powers to change this, but he should be mindful that Defra could begin the process of amending the legislation as part of their Review of Waste Policies.

13. **What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?**

- The Mayor's targets are in line with those that were being worked to previously, perhaps bar the extension to 60% by 2031. In this regard, the London boroughs were already grappling with their route to achieving such levels of performance.

- However, the Mayor is setting these targets in something of a contradiction to the messages coming out of central government. Defra has already withdrawn PFI credits from two London partnerships, citing a lack of need for their tonnage to meet UK targets, and this has therefore removed a major source of funding that had been awarded to deliver such levels of performance. Concurrently, the amount of funding the London boroughs have to spend on capital projects and service improvements is being cut so significantly that industry analysts are pointing to contractions or withdrawals of recycling services (particularly HWRCs and garden waste collections) as probable routes to achieving the savings. It is therefore rather dismaying to find the Mayor using the same targets for London without appearing to acknowledge the new reality of public sector finances, and the council would strongly urge him to reconsider these targets in light of how the coalition government is reshaping local government.

14. **What specific role do you think the Mayor has to play in improving recycling across London?**

- The choice, design and operation of household waste collection systems is a matter for the London boroughs.

- Depending on the outcome of the Defra Review of Waste Policies, the Mayor may have a role to play in galvanising private sector waste firms to develop appropriate recycling services for their customers, particularly as their contracts spread across borough boundaries. However, the design and operation of trade waste services run by council DSOs or through contracts held with local authorities should remain a matter for the boroughs.

- The Mayor has a key role to play in ensuring the successful delivery of the Recycle for London campaign, particularly as spending cuts force a reduction in the amount of communications on waste that the boroughs commission themselves. In this regard he should ensure that the RfL team is appropriately resourced and able to work effectively in partnership with the boroughs to deliver the campaign in a way that is relevant to London as a whole, but also at a borough and neighbourhood level.

15. **Any further comments on this policy?**

- The successful design and implementation of a recycling scheme cannot be achieved without a coordinated and sustained communications programme, which needs to address both the use of the service and also the reasons why recycling is important. LWARB funding has been committed to the Recycle for London campaign to address the latter, but the Mayor will need to support local authorities investing in their own communications, and champion the cause with those members of Government who do not believe that publicising recycling services is necessary.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

- The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. **Do you think that London should be working towards a vision where it manages most of its waste within its boundaries?**

- The Council broadly agrees that London should endeavour to manage most of its waste, if only to capture the economic benefit of the associated employment. However, the most environmentally friendly solution for some materials may be to treated or processed in neighbouring counties where space is more readily available, and the Mayor will need to ensure that the authorities in these areas understand the rationale for this.

17. **What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?**

- Given the quantity of London's municipal waste that is currently transported to disposal sites outside the capital, the delivery of a more self-sufficient waste sector in the city will require the development of a considerably amount of additional treatment capacity. One of the key barriers to this will be the allocation of land with appropriate transportation access.

- The development of waste facilities attracts a particularly high level of public attention and opposition, which can extend the planning processes considerably. In an urban area like London this will be especially significant, due to the proximity and density of local populations. A key barrier to the delivery of an enlarged waste sector in London will therefore the planning processes, and in particular the length of time needed to achieve an outcome, and the potential for these outcomes to be far from the optimal solution. The Mayor will need to strongly support local waste authorities through the entirety of their planning processes to ensure that engagement with the community is effective and consistent. He will also need to ensure that Government tows the line and supports the delivery of new waste facilities.

- The development of waste facilities is an expensive process, and with local authorities under considerable financial pressure for the next few years there may not justification for investing in the most environmentally friendly technologies. The Mayor therefore needs to make it easier for waste authorities to access LWARB funding in order to ensure that the facilities that are developed using this stream fit within long-term plans and provide some ongoing payback to the community.

18. **Any further comments on this policy?**

- As an urban area with some areas of considerable population density, London is ideal for the use of CHP networks as a means of providing low cost heat to residents and delivering greater energy efficiency. However, the capital costs for providing the infrastructure will not be something that local authorities can afford, and unless Government chooses to develop such networks it is unlikely that they will become a reality for many years. The Mayor will therefore need to ensure that requiring the building of treatment facilities with the potential for local CHP does not lead to a significantly increased financial burden for waste authorities, and that this does not skew the choice of facilities towards those that do not currently offer an optimal environmental solution.

- The generation of energy from organic waste generally requires food waste to be collected separately from garden waste, but most London boroughs currently combine these materials (either at the point of presentation by residents, or within the collection vehicle). The additional capital and ongoing revenue costs that the boroughs would have to bear to contribute a sufficient quantity of food waste for energy generation must therefore be factored in to any work that the Mayor undertakes to deliver against this objective, as would the additional communications needed to increase the separate capture of food waste tonnage beyond the current levels.

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:
Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

- After many years of local authority investment in litter bin provision and increased street sweeping services, it is time to recognise that the real problem lies in the attitude of those who drop litter. The reasons behind this can be varied, from a lack of awareness of the issue, bad habits that have not been dealt with, or an actual desire to be subversive and break the rules. The latter can also manifest itself through problems like graffiti, vandalism of property and, occasionally, deliberate contamination of recycling bins (a particular issue for on-the-go facilities).

- The council has introduced litter bins at a prodigious rate, and has also doubled the amount of litter clearance that takes place across the borough. However, street cleanliness remains one of the highest areas of concern for residents. It is recognised that this may be partly a perception issue rather than a reflection of the reality of street cleanliness in the borough, and the Mayor should therefore consider how he uses the resources available to him to address this issue, rather than spending money to tackle an area that is perhaps not really a problem.

- The Mayor is proposing to increase the level of enforcement against environmental crime, but the unprecedented spending cuts that local authorities are facing is likely to lead to a reduction in the capacity of the boroughs to undertake such work. Although it is agreed that effective enforcement is a deterrent to environmental crime, and the council takes one of the highest levels of enforcement action, the Mayor needs to recognise that the London boroughs may simply not be able to maintain existing levels, let alone increase them.

- London's public highways and public places require maintenance and investment to good standards in order to keep them clean. Pot-holes create detritus, whilst cracked or sunken paving stones make sweeping up small litter (such as cigarette butts) very difficult. The Mayor needs to recognise that the budget cuts imposed on councils will inevitably affect street environment quality standards, and in turn this will have an impact on street cleanliness.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

- The Mayor needs to recognise that street cleanliness is closely linked to levels of civic pride and regard for the environment. He therefore needs to consider how to tackle the litter problem through less direct means in order to achieve a long-lasting impact, and this may be more effective at a London-wide level (as most people will identify with being a Londoner, but not perhaps a 'borough resident'). Some recognition will also need to be given to the role that the community needs to play in keeping streets clean, and potentially consider some more innovative methods for engaging socially disaffected members of the population on this issue.

- Behaviour change will only come from a coordinated London-wide communications initiative that has the outright support of the Mayor and which can be easily latched on to by the boroughs. The Recycle for London campaign is perhaps a good example of how this can be achieved, delivering messages across the capital and also at a more local level. However, there is very little evidence in the draft strategy that a campaign of this type will be funded and developed by the Mayor, which will inevitably reduce the extent to which local behaviour change work can be effective.

- One of the potentially most effective tools available to improve street cleanliness standards across the city is the Capital Standards programme. This has been very well supported in the past by the boroughs, but this support has subsided in recent years. The Mayor has not overtly supported Capital Standards, and it is not mentioned in the strategy. The Mayor should consider his position on this carefully, as re-enlivening this programme would help him to achieve many of his stated aims.

- No overt mention has been made of the need to tackle litter through the education system, starting in the early years of primary education and continuing through secondary school (when it is perhaps more likely that individuals will start to behave in less socially cohesive ways). Any sort of campaign work will need to have a significant schools element, and the Mayor may therefore want to highlight this in his strategy.

- The Mayor needs to recognise that anti-terrorism measures on the transport network that resulted in the removal of litter containers several years ago have had an impact on the cleanliness of tubes and buses, and also put a greater burden on the areas immediately around station entrances. He should therefore consider whether it is appropriate for the GLA or TfL to invest in additional capacity in and around stations, and support this with a coordinated campaign that cascades through the transport network and is also visible in local areas.

21. **Any further comments on this policy?**

- The Olympics affords the Mayor with a prime opportunity to appeal to Londoners to embrace their city and take pride in its cleanliness. However, he will need to recognise that in many areas the Games will still be seen as something that affects only Stratford, and the relevance of the need to keep the streets clean will not perhaps be so obvious in terms of their local area. The Mayor will therefore need to ensure that any campaign work that uses the Olympic message is suitably tailored for use in those parts of London that are some distance away from Stratford, the other higher-profile Olympic sites, or more central areas where larger numbers of visitors can be expected to congregate.

- Furthermore, the window of opportunity for achieving behaviour change in time to impact on the Olympics is small. It would therefore be helpful if the details of the Mayor's plans in this respect were brought forward as early as possible, to help with the required planning in the lead-up to the Games.

About your organisation

22. **Name**

23. **Organisation**

I

24. **Address**

25. **Type of organisation**

- [x] London Borough
- [ ] Central Government
- [ ] Third sector
- [ ] Private waste sector
- [ ] Other

Please specify

_____

_____

26. **Approximately how many people does your organisation employ?**

- [ ] 0-50
- [ ] 51-250
- [x] 251+

Thanks for taking part!

The Mayor's Draft Municipal Waste Management Strategy – Jan 2010.

Comments on London Assembly and Functional Bodies draft

Chapter 1

The Strategy sets out a range of statistics in chapter 1 which set out a relatively poor performance in recycling and composting compared to the regions and a relatively high proportion of incineration - the exception to this being the West Midlands, which recycles 36% and incinerates 33% of its municipal waste. However these are 2008/9 statistics and municipal waste management provision has been changing rapidly in recent years and continues to do so. While comparisons are useful, it might be more useful to look at how the planned policies will change performance over the next five to ten years.

Figure four (p.23) should be re-titled London's current municipal waste flows. It would be useful to have an equivalent diagram showing the position in 2020 and 2031. It may also be useful to show the amount of energy which is expected to be produced over time to make a clearer link between climate change and waste strategies.

The distinction made between "mass burn" incineration and new Energy from Waste plants is not helpful. The important point of differentiation should be between the thermal efficiency of the different types of Energy from Waste plants. The revised EU Waste Framework Directive requires new waste plants to achieve a thermal efficiency of 65% to enable them to qualify as waste recovery facilities – with less efficient plants classified as waste disposal operations. If "mass burn" incinerators can meet the 65% thermal efficiency requirement, by utilising the waste heat, they should be acceptable within the overall Strategy.

Clarification should be sought from the government over whether the 75% waste recovery target in the national Waste Strategy (WS2007) will be affected by the new definition of waste recovery in the revised Waste Framework Directive. If the 75% target is to be retained in the national strategy, the Mayor's Strategy should include a similar target.

The suggestion in the draft Strategy that a separate recovery target is not necessary because the enhanced recycling targets will deliver it does not appear to be realistic. Boroughs will struggle to meet the high recycling and composting targets from collection systems alone because of logistical and budgetary limitations. However, recovery facilities may be able to boost the amount of materials that are ultimately recycled etc.

The Strategy envisages that pre-treatment capacity will increase to 1.2m tonnes in 2025 and fall to 1m tonnes by 2031. It may be difficult to obtain investment in pre-treatment plant in excess of 1m tonnes if this is not wanted beyond 2031

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Q. Do you agree the Mayor can best influence waste reduction and increase awareness on the value of reuse and recycling in London by supporting local and regional waste campaigns?

Yes the Mayor should actively support local and regional waste campaigns to influence waste reduction and increase awareness on the value of reuse and recycling in London.

However, the Mayor, in common with local government, has little influence on waste reduction. Local government deals with the end of the resource pipeline. Manufacturing, distribution and retail have the major responsibilities for this area and this needs to be addressed nationally or at a European or international level. Local and regional campaigns such as Love Food, Hate

Waste can influence consumer behaviour and help to reduce waste in certain areas and we support this proposal.
The Courtauld Agreement will help to deliver this target.

Q What else do you think the Mayor can do to make an effective impact?

Investigate and spread good practice on waste reduction such as the following:-

- Waste reduction effect of increasing recycling and food waste and reducing residual waste collection frequencies.
- Home composting schemes
- Real Nappy schemes
- Education & information schemes

In addition he could lobby the large retailers to promote waste reduction and show by example.

Q. Do you agree that a National approach to improving waste reduction and reuse is the best way forward? (Yes/No, why)

Yes, there would be an advantage to a National approach as the message could be build on at a regional and local level. Influencing manufacturers, distribution and retail can most easily be undertaken by national government and European legislation. However this should not be an excuse for the Mayor to do nothing while waiting for the Government to catch up.

Q What measures might the Mayor most valuably lobby government for?

- A National approach to waste reduction
- For retailers especially the large supermarkets to promote and make it easier for residents to reduce their waste.
- To lobby for legislation to require supermarkets to take back packaging.

Q. What do you think will be the main barriers to achieving targets set on reduction of household waste? How can they be overcome?

To date the reductions in household waste, not associated with the economy slowing down, are linked with the expansion of recycling and composting schemes – in addition to the Courtauld Agreement. As residents segregate there waste for collection they become more aware of what they are throwing away and reduce it, this most apparent with food waste collections. Again if there is a restriction on residual waste disposal (fortnightly collection or small bins) along with ample recycling & food waste collections the overall waste will drop.

The barriers are:-

- That there are a large number of properties in London that are difficult to provide an extensive collection service too such as purpose build flats, flats above shops and some house conversions due to the lack of space.
- How to reinforce the message of waste reduction in addition to segregation.
- How to brake the link between waste production and the economy when the recovery takes off.
- Information overload (for residents) – particularly with complex waste reduction messages.

Q. This target, when coupled with the increase in number of households, will deliver a zero percent increase in London's net household waste. Do you consider this target to be too high, about right or too low and why?

This the one of the most challenging target in the strategy as historically new properties mean additional waste and there has always been waste growth associated with economic growth. As stated above the reductions in waste over recent years are related to the introduction of recycling and composting schemes making residents more waste aware and the poor performance of the economy Many of the new properties will be flats where again it is difficult to recycle from and also to communicate with. The target appears to be a reasonable assumption but it should be noted that this will affect the boroughs differentially

Q. What do you think are the main barriers to achieving targets for reuse and repair, and how can they be overcome?

Before any target can be achieved an accurate and robust system for monitoring and recording reuse & repair needs to be introduced. Much of the material currently reused through second-hand & charity shops and boot fairs is not in the municipal waste system and may not be waste at all. The existing reuse and repair outlets need to be built on to divert more waste. As the most efficient method is for the residents to deal directly with operators directly and donate their items for reuse it might only be noticeable as a general reduction in waste rather than recoded reuse and repair.

The most significant barrier to achieving the targets is a lack of infrastructure to collect, repair and store suitable goods and materials. Without the infrastructure, the targets will be difficult to deliver. Investment to create the capacity is vital.

In addition to investment in infrastructure, the sector needs to raise its public visibility so that it becomes the natural choice for people who wish to dispose of bulky furniture, white goods etc.

Local authorities' bulky refuse services may be contractually committed which may necessitate a gradual process.

In regards to repair the community run repair workshops and furniture stores they often provide other social benefits such as training, helping the long term unemployed get back into work and provided affordable furniture. However this can not be self financing on the collection charges for the donated material and the scale of the repaired goods on their own. The other social benefits are often dependant on grants which in a time of economic restraint it may be difficult for the a major expansion in this area

Q. Considering what you know already exists in the reuse sector in London, how do you think the sector could most effectively be developed and supported to improve reuse rates?

For the London Waste & Recycling Board to consider funding a London wide reuse collection and repair network for furniture and electrical goods connected into a social retail network.

Q. What do you think are the key elements for an effective programme of action with manufacturers and retailers to reduce packaging?

Packaging serves a useful purpose where it prolongs the life of perishable goods or ensures that goods are protected from damage. It is excess packaging which is the major challenge. The Mayor should work with WRAP and the major compliance schemes such as VALPAK to

- Spread good practice on packaging reduction.

- To agree what packaging is required to allow the goods to safely get to the store and the residents home.
- To reduce and eliminate cosmetic packaging.

To reduce the materials used in single use packaging to those that can be easily recycled

Q. How can the Mayor best measure the direct impacts of actions he supports to reduce waste, increase recycling and reuse? What are the key factors that need to be taken into account?

With great difficulty as previously stated before any target can be achieved an accurate and robust system for monitoring and recording reuse & repair needs to be introduced. Some of the waste diverted by residents for repair or reuse technically may stop being waste. Any system will need to record where the item has come from address and borough, its weight (could use standard weights) and what has happened to the item.

Policy 2: setting a greenhouse gas standard for municipal waste management activities to reduce their impact on climate change.

Comment: There is a potential conflict with this suggested approach, in that waste authorities' current balance sheets do not take into account the carbon benefits of waste management activities. i.e.

- NI 185 measures all CO2 emissions – from fixed assets and transport.
- The new Carbon Reduction Commitment – Fuel Efficiency Scheme will only measure carbon emissions from fixed assets (e.g. gas, oil and electricity) – transport emissions will be excluded.

Only the CRC scheme will involve an element of carbon trading. The mechanism does not currently exist to reimburse councils for any additional costs imposed by seeking to optimise the greenhouse gas outcome.

Q. Do you agree with the Mayor's proposed approach for the management of London's municipal waste based on lifecycle greenhouse gas performance? Which waste management activities do you think should or should not be included in a common modelling approach to lifecycle greenhouse gas accounting for waste?

The approach is sensible in determining the lifecycle performance. All waste activities should be modelled so ensure that all options have been properly measured.

Q. What do you see as the key barriers to implementing a lifecycle greenhouse gas performance standard? What are the key steps that need to be taken to ensure its success?

A key barrier is that current accounting rules do not internalise the carbon savings into a waste authority's balance sheet. E.g. the carbon saved by the separate collection of glass and its reuse as feedstock for new bottles, does not form part of the calculation for local councils. Only the amount of carbon used by their collection systems would be recorded. Unless the carbon cost from the wider benefits can be internalised, it would be difficult for local authorities to take these into account – particularly at a time when local authority finance is expected to be constrained.

Q. Do you agree that focussing on lifecycle greenhouse performance is more effective that focussing on specific waste services or technologies? What level of standard can or should be adopted?

Lifecycle greenhouse performance is a useful technique (and conforms with national strategy aspirations) but waste authorities will also need to consider overall cost, value for money and the reliability of the technology in dealing with municipal waste when determining how best to proceed.

Q. Do you support the adoption of WRATE as a common modelling approach? Are there any limitations or strengths of adopting this approach? Alternatives and further suggestions?

The adoption of WRATE as the common modelling approach is supported.

Q. Given these considerations, are there any waste solutions that you consider inappropriate for London?

In principle, all waste solutions are acceptable but actual selection will depend on factors such as cost, environmental performance, planning, finance etc.

Q. Do you agree that the Mayor's waste management hierarchy is the approach? Are there any other considerations that should be included?

No. The Mayor should adopt the waste hierarchy set out in the revised Waste Framework Directive. The final box in the illustration on page 42, would then read "Treatment of waste through disposal techniques through energy plants generating electricity only, or disposal to landfill". The Mayor could consider adding a further box reading "disposal of waste to landfill – as the final, least favourable, option".

Q. Do you agree that the Mayor should support the development of advanced conversion technologies in London? What do you see as the main challenges in achieving this?

The Mayor should support technologies that recover heat and power from residual waste streams. I.e. waste recovery facilities should achieve thermal efficiencies of 65% - as required by the revised Waste Framework Directive. The Mayor should not differentiate between different technologies unless there are clear carbon benefits that justify any additional costs. However the issues will remain as to who will meet these additional costs - the waste authority or the Mayor.

Q. What do you see as the key issues in retrofitting incinerators and improving their efficiency and greenhouse gas performance?

The costs of providing a local heat network and connecting to existing incinerators to the network is the key issue, as will finding partners who can make use of the available heat. Currently it is not worth investing in a heat main as there are no customers and its not viable to design building to use heat as there no suppliers. To break this loop a loan or grant is required to fund the heating network. A loan could work in a similar way to student loans in that repayments start as the heat network starts to be used and the level of repayments increase as more users use the heat. The Mayor could have a significant role in securing the grant or loan funding.

Q Are you aware of any instances when this has been undertaken that we might learn from as best practice?

District heating systems connected to waste to energy mass burn incinerators are common across Europe. The most developed is Copenhagen which has a doubled pipe district heating network 1,500 km in length. In Dublin where there has not been any district heating scheme a new incinerator is under construction. At the same time a district heating network is being developed initially in the nearby Dublin dockland redevelopment area connected to the incinerator. The district heating network includes a tunnel under the River Liffey, the incinerator will also produce electricity. Extensive feasibility studies were undertaken and there is a plan to extend the network up untill 2024. The contact at Dublin City is John Singleton john.singleton@dublincity.ei

Policy 3: Capture the economic benefits of municipal waste management.

Comment: Capturing the economic benefits of waste management is a desirable aim and one which the Mayor may well have a legitimate view on. Provision of facilities within London would provide both employment and carbon benefits. It is less obvious why these benefits should be realised in the public sector as opposed to the private sector.

Q. Do you think that the Mayor's vision for London's waste to be considered "an opportunity to be exploited" is the right vision? Is it an achievable vision? What are the risks?

As a general principal we agree that London's waste should be treated as a resources and where it appropriate this should be exploited. It is an achievable vision but will take a prolonged period of time as many current contracts will not permit this and these will have to completed before an opportunity can be exploited. The main risk is that the market price of recovered materials can change both up and down very rapidly this is difficult for waste authority budgets to cope with.

Q. Do you agree that waste authorities should consider revenue-sharing opportunities with waste management contractors in order to realise some of the monetary value waste can offer?

Some waste authorities have preferred to minimise financial risk by not seeking to share in the rising value of waste materials. Others have shared the bonus of rising markets. The element of risk is usually reflected in the price.

This is a decision that is best left to the individual authorities involved who can take a view based on what is best for them

Q. What kind of issues do you think waste authorities might encounter in trying to do this? How can the Mayor support them best in pursuing this approach and overcoming problems?

The major problem with revenue sharing arises when markets are falling and councils have set their budgets based on high material prices.

Q. Do you know of any good examples of revenue sharing and joint venture arrangements?

One example is where local authorities collect commercial waste on behalf of private contractors.

Q. Do you think waste authorities should consider owning and operating their own waste facilities?

There is a balance to be made between size of plant and economies of scale. The market may be a better judge of the risks involved than local authorities.

Q. What support do you think the Mayor could most usefully give to help develop this opportunity for waste authorities? What are the risks for the parties involved?

Lobby Government for powers to produce a statutory waste strategy covering municipal and commercial and industrial waste..

Q. What are the key considerations to ensuring success for waste authorities owning and operating treatment facilities?

Many of the waste transfer & treatment facilities in London where designed, built and operated by the GLC or the Boroughs before the Environmental Protection Act 1990 was enacted. The main change since that time is that both capital and revenue funding for waste authorities is

much tighter. Waste authorities are likely to consider this option when evaluating new treatment facilities. It is unlikely that a waste authority would take a risk on an untried technology or a large facility.

Q. What do you think are the key areas of waste management that the third sector should be involved in?

Reducing, reusing and recycling waste.

Q. What do you see as the key barriers the third sector faces in delivering local authorities reuse and recycling services?

Often the third sector can not deliver or provide evidence on being able to deliver on the scale to collect from one or more London Boroughs. In addition there accounts have difficulty in passing the standard financial tests which waste authorities which are undertaken on potential contractors.

Q. How do you think the Mayor can best help overcome these barriers?

Spreading good practice to waste authorities.

Policy 4: London to achieve 45 per cent municipal waste recycling or composting performance (including anaerobic digestion) by 2015, 50 per cent by 2020 and 60 per cent by 2031.

Comment: The aspiration to high recycling rates is welcomed. It is less clear how such high levels will be achieved.

The magnitude of the task to increase recycling rates should not be underestimated. Outer London boroughs' geography make it easier to achieve high collection rates but even the best performers will find it difficult to progress beyond 50%. In inner London, the type of housing and lower levels of garden waste mean that achieving high collection rates is much more difficult.

To achieve high collection rates, Boroughs will need significant financial support to introduce recycling collection infrastructure. This is particularly the case for people who live in flats - either private or social housing. The current draft seems to only refer to retrofitting social housing where this is integrated with other social housing retrofit programmes. This is too narrow a brief. Support should also be provided for non-social housing – particularly the provision of separate bins – with local authorities providing the necessary publicity support and collection services. Any proposal to support such collection infrastructure by LWaRB would be very welcome.

Pre-treatment of waste may help to boost overall recycling rates to the sort of levels envisaged but there will be a cost involved

In this context the adoption of high overall targets seems to be too optimistic. Given the expected restraint on council budgets, high targets may not be affordable.

It is strange that the Mayor has chosen not to set recovery targets and instead has set out recycling and composting targets only. The draft sets targets of 50% by 2020 and 60% in 2031. Waste Strategy 2007 sets a national target to recover value from 75% of waste by 2020 (of which 50% shall be achieved by recycling and composting). The proposed strategy therefore falls significantly short of the national recovery target in 2020.

Q. Do you agree that food waste collections, recycling services to flats, on street recycling services, and business waste recycling services offer the greatest opportunity for increasing recycling rates? Is there something else, if so, what?

In general, these should be the priority areas but how will the additional costs be met?

Q. Do you agree that incentives should be developed to encourage people to recycle more? What should be the key considerations when developing such an approach? What do you think the best incentive options are that we should develop in London?

Incentive schemes may be an effective way to stimulate uptake of recycling where it is not already developed and where suitable schemes can be introduced. Where boroughs are already delivering high recycling rates they would add to costs and may make existing economics more difficult
Different collection methods will complicate the introduction of incentives. E.g. plastic sacks and box schemes will present greater problems than wheeled bins.

Q. Are you aware of any local recycling and composting campaigns that we might be able to bring together with regional initiatives through Recycle for London? If so, what are they?

The clean city award scheme (Corporation of London) is an excellent example of good practice in raising awareness.

Q. What support might the Mayor best offer to improve recycling levels of small business waste?

Q. If the Mayor were to lobby government to adopt a scheme that better incentivises boroughs to collect non-household municipal recyclables, what type of policies or incentives do you think would be the most effective?

Abolishing LATS would be helpful as it would remove existing artificial barriers between municipal and commercial and industrial waste.

Q. Are you aware of any effective solutions to providing recycling services to households that are nor easily accessed from the street that might be rolled out across London? If so what are they?

Q. Do you agree with the Mayor's proposal to consider retrofitting existing flats and social housing estates with facilities to improve recycling rates?

Yes. This is welcomed. However the brief is too narrow and needs to be expanded to all types of flats and tenure. The current proposals ignore private sector flats. In some parts of London the typical flat development will comprise 8 to 16 flats. In these circumstances the provision of additional bins for recycling is all that is required. At present local authorities do not have sufficient financial resources to provide bins

Q. Do you agree that establishing a network of "on-the-go" recycling bins should be done using public and private funds?

The general principle is good, but the performance of "on-the-go" recycling bins can be extremely poor. This is mainly due to the public's unfamiliarity with or indifference to the concept. There is a significant risk that such a network will be expensive to service and produce little useful material.
Whether private and/or public funds are used, the cost of establishing the network is likely to be relatively minor compared with the on-going costs of education, enforcement and collection. The strategy does not say how these on-going costs would be funded.

Q. What do you think are the primary considerations when developing "on-the-go" recycling bins across London?

In a period when public finances are likely to be severely constrained, the costs of collection are likely to be the main consideration.

Q. Do you agree with the Mayor's approach to increasing municipal recycling and composting performance? What else could he do to help boroughs improve performance?

Boroughs main requirements is for collection infrastructure. This would have the major impact on the types of services that they can offer residents. In most cases the additional materials will feed into existing processing infrastructure.
The Mayor should encourage LWaRB to invest in LA collection infrastructure, which is not necessarily tied into the provision of new processing infrastructure.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Q. Do you think the Mayor's proposals will successfully secure those elements of investment for London's waste infrastructure? What else can the Mayor do to close the residual funding gap to deliver the waste infrastructure London needs?

This raises the question of whether there is a funding gap for waste management infrastructure in London. Funding is available from the private sector for a range of technologies and facilities. The missing pieces of the jigsaw has been planning, the provision of land, and agreed contracts. The rising cost, and diminishing availability of landfill means that alternative technologies are becoming financially viable. If the Mayor's strategy can provide a clear vision and remove uncertainties, the waste authorities and the market should be able to deliver the investment.

Q. Do you agree that the Government should continue to fund the London waste board beyond 2012? What would you want to see to be convinced this should occur?

Yes the government should continue to fund the board. However, the performance of LWaRB in providing finance to waste authorities has been disappointing to date. If it can devise a business plan which actively helps them increase recycling and reduce landfill it would be beneficial for it to continue in existence.
See previous comments on funding collection infrastructure.

Q. Do you support the Mayor's vision to develop new and existing waste facilities for reuse, recycling, and renewable energy in London to move the city's waste management further towards self-sufficiency and catalyse further waste infrastructure?

Yes.
Note: This should include municipal and commercial and industrial waste.

Q. Do you agree with the Mayor's vision to treat waste within London and as locally as possible to the source, to encourage self-sufficiency and to realise the value for waste disposal?

Yes but the vision should recognise that waste will cross London's boundary (in both directions) in order to be treated locally. There should not be a ban on waste being exported if it makes geographic sense to do so.
Note: This should include municipal and commercial and industrial waste.

Q. What do you see as the key issues that might arise in trying to improve and develop existing waste treatment facilities? Do you agree with the shift to only land-filling reject and inert residues from recycling and energy recovery?

Improving and developing existing waste treatment sites will need to be considered on a case by case basis through the planning and regulatory system. Where sites are to be developed alternative arrangements will need to be put in place during the construction and commissioning phases.

A move towards only land-filling reject and inert residues from recycling and energy recovery is supported.

Q. Do you agree that the Mayor should be working to encourage more sites in London for new technologies to treat waste in a sustainable way? Do you see any problems with this; are there any considerations that should be made in taking this direction?

Yes. We assume that this is covered by the revisions to the London Plan.

Q. What are the key issues likely to arise when considering retrofitting London's incinerators to capture heat generated for local use? Is there likely to be scope for undertaking this type of project?

The key issue will be around how to use the heat and ensuring that the load is matched to the demand. See previous comments on retrofitting existing incinerators.

Q. Do you agree with the Mayor's support for the conversion of landfill gas for energy generation? What do you see as the main issues to achieving this?

Where landfill gas is produced, it should be used productively.

Policy 6: Achieving a high level of street cleanliness

Comment: London is a world city and has a high daily footfall from commuters and visitors. Achieving and maintaining high levels of cleanliness is difficult and this partly explains the difference between London and the regions. London councils and Capital ambition have undertaken work to try to understand how these factors impact differentially on London.

The current arrangements for street cleaning in the capital are uncoordinated. The previous Capital Standards programme was designed to provide a framework for coordination and common standards but foundered due to lack of support and /or financial constraints.

There has also been work by London Councils. Capital ambition and, more recently, by LEDNET.

The Mayor does not have statutory powers to require the boroughs to achieve a certain level of street cleanliness but can reasonably set out requirements for what happens to the collected waste (under the Municipal waste Management Strategy).

Any agreement on street cleansing would need to be by agreement between the Mayor, London Councils and the boroughs.

Q. Do you think the Mayor should set a benchmark for street cleanliness in London?

A benchmark is a useful tool to raise standards. However higher standards usually involve additional costs. The draft strategy does not make clear whether the Mayor will provide finance to help boroughs meet higher standards.

Q. Do you agree that stronger enforcement strategies across London would result in a reduction in litter?

Enforcement can be a useful tool to help to change the public's behaviour. However London is a varied and diverse city with considerable local variations, it would not be appropriate to apply the same standards of enforcement across all areas. Local circumstances need local solutions.

Q. Do you think government should direct more national funding for litter and chewing gum campaigns to London leading up to the Olympics?

Yes

Q. Should the Mayor work with tobacco manufacturers for the purposes of raising awareness and changing the behaviour of smokers who drop cigarette ends on the ground?

Yes

Q. What, if any, are the measures that you think are missing to achieve clean streets for London? Are there particular approaches or stakeholders that are important but not mentioned above?

The issue of discarded chewing gum despoiling our streets has been along-standing issue. Councils are either faced with significant costs to remove the discarded gum or have to leave the gum in place. Public education has not been successful and enforcement is extremely difficult to undertake successfully. The Mayor should seriously consider imposing a charge at the point of sale, with the proceeds being distributed to the boroughs to meet the costs of removing the gum. Where manufacturers can demonstrate that their gum is non-stick, the charge would not apply.

By email to:viewsonwaste@london.gov.uk

Mayor of London
City Hall
The Queen's Walk
London
SE1 2AA

14th January 2011

Dear Mayor Johnson,

Ref: London's Wasted Resource – The Mayor's Draft Municipal Waste Management Strategy – Public Consultation Draft.

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority (NLWA) is one of the six statutory joint waste disposal authorities in England and one of the four in London. We handle nearly 1 million tonnes of municipal solid waste collected by our seven constituent borough councils namely, Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

In our attached response we have focused upon aspects which have particular relevance to the Authority. The strategy has been reviewed in parallel to the Mayor's draft Climate Change Mitigation and Energy Strategy for public consultation, November 2010 and the Mayor's Business Waste Management Strategy.

If you require any further clarification of the points raised in our response or have additional queries please do not hesitate to contact me.

Yours sincerely,

Cllr. Clyde Loakes
Chair of the North London Waste Authority

GENERAL COMMENTS **3**

NLWA KEY POINTS **3**

THE MAYOR'S DRAFT MUNICIPAL WASTE MANAGEMENT STRATEGY FEEDBACK FORM **5**

THE VISION 5
THE OBJECTIVES 13
OBJECTIVE 1 13
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General Comments

Consideration should be given to extending the Consultation period for the Mayor of London's Draft Municipal Waste Management Strategy to allow respondents to properly reflect the outcome of current Government consultations in these areas, in particular the DEFRA Review of Waste Policies. Until these consultations are completed and the results assessed and put forward into a new national strategy or at least a draft, the consultation on the Mayor's strategy may be premature. Additionally we expect that the strategy will be updated in light of more recent information now available so that the 2009/10 municipal waste management data and recent announcements on the status of Capital Ambition, National Indicators and the withdrawal of PFI waste funding to London's waste authorities are all taken into account.

It is also our view that with some of the proposals the strategy does not appear to recognise that this is a time of recession when local authorities are required to deliver huge budget savings particularly around proposals which require significant investment in the early years.

NLWA Key Points

Whilst compiling our response to the strategy a number of key points arose which we have drawn out as a summary as detailed below:

I. Policy 1 - Reuse, Recycling and Composting

Increasing recycling and composting performance in the early years when local authorities are required to make cuts is a concern. **Whilst it is a laudable aspiration to increase recycling rates, significant investment is required in the early years to deliver these aspirations at a time when local authorities are required to deliver huge budget savings therefore, it is difficult to see where this investment will come from.** Also, the Strategy does not contain proposals sufficient to ensure that an overall 20% reduction per household will be achieved. Furthermore, waste reduction targets cannot be achieved without action from the manufacturing industry. The Strategy should recognise the limited impact London's waste authorities can have on influencing the quantities of household waste requiring collection and treatment or disposal.

II. Policy 2 - EPS

NLWA commends the move towards carbon-based outcomes and acknowledges that the EPS and the carbon floor are innovative approaches to the way London seeks to manage its waste arisings in the future. NLWA also welcomes a focus on climate change in waste management practices and supports a move away from tonnage based targets towards carbon-based outcomes. **However, NLWA requests that a separate consultation is undertaken with stakeholders on the EPS once the GLA has identified how the EPS will work in practice**. Sufficient information and scientific evidence to support the introduction of the EPS should be provided and in the meantime the strategy may want to acknowledge that the EPS is 'work in progress' and subject to review, with the Mayor's proposal downgrading the Emission Performance model to an advisory tool which waste authorities and relevant parties can use voluntarily.

NLWA, therefore, requests that the Mayor changes the wording of Policy 2 and its related proposals and targets to reflect that the EPS is not a compulsory standard but an advisory tool.

III. The Mayor's Waste Hierarchy

In an already complex environment with respect to policy and legislation, **NLWA recommends that the Waste Management Hierarchy enshrined within the Waste Framework Directive to be transposed to UK legislation by January 2011 is a more appropriate hierarchy to be followed.**

IV. LWaRB

NLWA requests that the Mayor places a greater influence on directing London's waste and recycling fund directly to waste authorities as we are concerned that public funds are being used to finance investment in private sector facilities handling commercial waste with limited/no benefit returning to the public sector in some cases. Waste facilities have fairly discrete geographic catchment areas so that the element of price competition between LWaRB supported facilities (as well as with non-LWaRB supported plants) is likely to be minimal leaving the public sector with little/no benefit, even in terms of competitive gate fees from the supported facilities.

V. London Plan

The Authority agrees that London should be working towards a vision where it manages most of its waste within its boundaries as long as this does not jeopardise what may be a more environmentally friendly solution in terms of the carbon impact and as long as the definition of waste managed in London is a reasonable definition which includes the definition as suggested by the Authority in its supplementary response to the London Plan as detailed below:

In the light of the above the Authority therefore recommends a change to the current wording of the third bullet point within section 5.73 of the London Plan to[1]:

For the purposes of meeting self-sufficiency, waste is deemed to be managed in London if:

- *it is used to prepare Solid Recovered Fuels as defined in CEN/TS 15359:2006, which is not disposed to landfill and is used to generate energy.*

VI. Combined Heat and Power and Energy Networks

NLWA would like to encourage the Mayor to actually develop a heat network. The investment required is such that it will not be built without support. Local authorities alone are not able to build and neither will the private sector. The London Development Agency (LDA) is working on the Thames Gateway Heat network which is to be designed to allow for heat users and heat suppliers to connect to. Our understanding is that it will take up to 15 years to be fully ready. **The Mayor needs to invest more in these types of developments to provide the infrastructure for those looking to supply heat. There is now uncertainty as to whether this will happen following the news that the LDA is being closed and its development function moved into City Hall.**

VII. Technology

NLWA is concerned that although this strategy purports to be technology neutral in some instances the strategy leans towards advanced technologies. We are of the view that the best technology for a situation is derived by specifying the outputs and using the competitive market process to derive the best solution. **Our view is that there is no evidence to demonstrate that advanced technologies such as gasification and pyrolysis are operating commercially and successfully on a large scale within the UK and as such are currently unlikely to be bankable as solutions for large volumes of residual waste.**

[1] Other 'end-of-waste' criteria for SRF may come into place in the future, but for the present this is the Authority's recommended change.

The Mayor's Draft Municipal Waste Management Strategy feedback form

The Vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

The NLWA sees the key issues that need to be addressed in order to achieve this vision as:

I. Funding for waste disposal authorities to deliver the required infrastructure.

NLWA recently had its provisional allocation of £258.4 million of PFI credits reversed by Government. This project, as detailed in the reference case was set to provide a 470,000 tonne per annum increase in the UK's Anaerobic Digestion (AD) capacity from both MBT and AD treatment facilities and with the AD and other new facilities located in London would pave the way for London to become a world leader in urban municipal waste management. The design, build and operation of the facilities would also lead to job creation. Using AD to provide renewable heat and power is also a means by which the economic value of waste is exploited and the recycling and composting performance of London's waste is increased.

The reversal of the PFI decisions for both North London and the South London Waste Partnership may indeed hamper this vision from being achieved. In summary, without funds being made available, it will be an extremely difficult task, particularly within a period of significant economic restraint, for waste disposal authorities to deliver the required infrastructure to achieve the Mayor's vision within the timescales set. This combined with a loss of LDA funding and uncertainties regarding the future levels of capital funding that the LWARB might have available might lead the Mayor to reconsider targets drawn up at a point when public finances were not so exceptionally constrained. The Mayor needs to lobby Government to reconsider such decisions and as illustrated in this strategy document – The economic modelling concluded a "Do nothing new" approach would increase London's annual municipal waste management bill from about £580 million in 2010 to about £680 million by 2031.

II. Reducing the amount of municipal waste generated by the capital.

A significant amount of waste reduction and reuse can be achieved through supply side rather than demand side initiatives. The NLWA sees the key issues that need to be addressed to reduce the amount of municipal waste as:

a) Historic focus on recycling and recovery of materials

One of the key barriers to achieving household waste reduction targets is the historic focus on recycling and recovery of materials, rather than the prevention of materials becoming waste in the first place. Even though recycling has undeniable environmental benefits, it is significantly less beneficial than waste reduction. To date, whilst there is a number of recycling related success stories at a local and national level, a similar level of effort has not been focused on waste reduction and this lack of historic focus and momentum for waste reduction initiatives is a key barrier going forwards.

b) 'Total Waste' Targets

The Mayor's strategy document sets out a London wide target to reduce household waste by 10% of 2008/09 levels by 2020 increasing to 20% by 2031. As these targets are 'total waste' based rather than a proportion or percentage reduction on the amount of waste remaining after recycling and composting the ability of local authorities to influence the same is limited. **The influence local authorities have on waste reduction is limited as many of the interventions are outside of the household and therefore outside of local authority control.** Local authorities are only able to use education as a tool to encourage waste minimisation and this has limited potential to reduce wastes as in many respects waste reduction is outside householders' control. Supply side interventions focused on product producers and suppliers may have a much greater impact than demand side measures focused on product users. Therefore another barrier to the achievement of reduction targets is that suppliers have an influence on these targets and this is something outside of local authority control. The Strategy recognises that the number of households in London is expected to increase by 22% to four million by 2031, at current levels of waste production i.e. 970 kg/hh this equates to 3.88 million tonnes of household waste by 2031. The strategy is proposing that this is cut down to 3.16 million tonnes of waste implying a zero production rate of waste from the additional 730,000 households and therefore, it seems rather dismissive of the complexity of waste minimisation and prevention approaches to suggest a 20% reduction in household waste by 2031 in the light of this significant increase in household numbers.

c) Invisibility of Reduction Efforts

The achievement of waste reduction targets can be largely invisible to the householder, so unlike recycling where the householder can see if they are recycling a lot, it is much more difficult for householders to see that they are producing less and therefore helping to reach targets or benefit themselves. Coupled with this, the visible positive benefits associated with recycling, such as sitting on recycled plastic furniture or buying a fleece jacket made out of recycled plastic bottles are not there for waste reduction. In the absence of direct charging for waste there is nothing to show for not producing it in the first place.

III. Significantly Increasing Recycling and Composting Performance

- North London Waste Authority Evidence

All analyses relating to collection systems suggest that a 50% recycling rate for an urban environment such as North London is very challenging and can only be secured by maximising the contribution to recycling performance by significant enhancements to collection systems, significantly improving Household Waste and Recycling Centres (HWRCs) and securing a further contribution to recycling performance from residual waste treatment arrangements/technologies.

There are two significant issues that are likely to mean that North London may not be able to achieve the same recycling rates as are achievable nationally:

a) Green waste is a smaller proportion of the household bin in North London than nationally arising from a relatively low number of private gardens, a large proportion of flatted properties without gardens and the gardens from those houses with them tending to be of a relatively small size. Recent composition work identifies that green waste is 10.22%[2] of household waste in North London compared to 20%[3] nationally;

b) The large and growing proportion of flatted properties (including high rise apartments) which currently have a lower overall recycling rate than other properties, in part because of the lack of access to green garden waste as identified above but also the lack of space to provide recycling containers. For example Camden, Hackney and Islington's proportion of flatted properties is 86%, 80% and 76%. The national average proportion of flatted properties is 19%.

NLWA is therefore supportive of policies that seek to maximise recycling and composting performance, however, the above analysis shows the difficulties with achieving even 50% in the north London area.

Other issues include:

a) Engaging with hard to reach communities and servicing them

b) Communicating effectively with diverse populations especially due to language, socio-economic, practical and structural short-term barriers i.e. a mind set of 'if I do not recycle this small aluminium can it will not have a detrimental effect on overall recycling'.

c) The Eunomia[4] report also acknowledges this point stating that meeting the proposed recycling targets does depend upon significant behavioural change, especially for residents in high density housing and thus measures must be put in place to assist this change.

d) Constituent Boroughs and the Comprehensive Spending Review

Significant investment is required in Constituent Borough collection systems to deliver the recycling and composting aspirations and at a time when local authorities are required to deliver huge budget savings, it is difficult to see where this investment will come from to achieve the recycling and composting targets proposed. The Eunomia report points out that *'In initial years, therefore, annualised collection and recycling costs increase significantly for Boroughs'*. This is the same period where Boroughs are being made to cut budgets by up to 30% and therefore the question is posed: How will Boroughs afford the investment in infrastructure that is required in early years?

[2] North London Waste Authority, Waste Composition Analysis Project for NLWA, Final Interim Report, ENTEC, August 2010.
[3] Dr Julian Parfitt, WRAP. Analysis for 'Waste not, Want not' 2002, available at http://www.defra.gov.uk/evidence/statistics/environment/wastats/bulletin09.htm
[4] Economic Modelling for the Mayor's Municipal Waste Management Strategy, April 2010

IV. Generating Energy from Waste that cannot be reused or recycled in the most environmentally friendly way possible

The Authority agrees with the proposal to generate energy from waste that cannot be reused or recycled and has demonstrated this through its procurement approach which intends to produce Solid Recovered Fuel (SRF) from the residual waste stream. The Authority has sought to create the flexibility to move the energy opportunity by seeking to create a fuel that is refined and stable. The Authority is also securing a sustainable transport solution if necessary so that the carbon benefits are not dented by road transport. By separating fuel use from the bulk of waste services the Authority has opened the door to energy users and generators without the need for them to become waste management companies. The Authority has also adopted an approach that provides for a competitive procurement process, so that the most deliverable solutions will be taken forward. This potentially opens the door to major energy facilities capable of taking the 330,000 tonnes of the SRF that will be produced, although the Authority is structuring the procurement in lots such that organisations can bring forward proposals to take less than the full amount of SRF. So, for example, a regeneration scheme involving commercial development and several thousand new homes could access such an opportunity.

The Authority sees the following as the key issues that need to be addressed in order to achieve the EfW vision for London:

a) Planning

Where planning permissions are required to implement service contracts (of for example 25 years), the planning risk associated with the ability to secure consents is critical to selecting service providers. NLWA is concerned that the ability to secure timely planning permissions for EfW plants and associated infrastructure may be a barrier to generating energy from waste. Even in circumstances where the planning policy framework supports EfW development NLWA believes that the timescales associated with securing planning permissions can be protracted, with no certainty of success given waste development is generally considered to be contentious and raises local concerns.

In addition the following barriers exist:

- Large economies of scale for EfW facilities necessitate larger local environmental impacts;

- Even if planning is approved – the length of time to achieve this is long. Typically in the UK delivery of plants takes 7 years and the EfW facility at Belvedere in East London took 17 years to gain planning permission.

- The land take of a large EfW facility (250,000 tpa) is between 2 and 5 hectares[5]. Barriers around this could be the appropriate allocation of land for waste use to allow siting of EfW plants.

b) Financial Barriers

- The capital cost of a gas fired CHP is typically ten times less than that of an EfW CHP facility, therefore discouraging investment in any waste fired CHP. The higher cost arises partly as a result of the cost of compliance, i.e. meeting WID requirements and the uncertainty in Government revenue streams to offset costs.

[5] Planning for Waste Management Facilities – A research study. Enviros, 2004.

- There are limited outlets for digestate (approx 50% of inputs) arising from AD of mixed residual waste. Disposal costs for this digestate can be as low as £10 per tonne, excluding any applicable taxes, when used as a landfill cover or as high as £100 per tonne if it is sent to an EfW facility. This difference has an implication on the overall costs and what is used when designing a financial model.

- There is a high reliance on financial penalties such as LATS and Landfill Tax rather than financial incentives such as ROCs/CHP/CCL. Although not directly pertinent to barriers to EfW, this point illustrates what appears to be a situation where penalties are focused on the waste sector and the incentives are focused on the energy sector.

- There is an uncertainty over replacement for ROCs and how the Renewable Heat Incentive (RHI) will be funded and this is preventing long term planning for any waste project. As an example, the level of the RHI was expected to be announced by December 2009, however, this has been further delayed which is a concern as the scheme was set to be begin in April 2011.

c) Co-ordination and Support

- AD can exist as a standalone treatment for organic waste or can be incorporated into MBT facilities and used to treat the organic fraction of residual waste. Equal support should therefore be given to AD and MBT facilities incorporating AD.

- **Lack of co-ordination and investment in CHP opportunities** e.g. neither the Edmonton EfW facility in North London or the South East London Combined Heat and Power (SELCHP) waste facility in South London is connected to a heat network. The Authority notes that the strategy document states that 'The greatest opportunity is in using the vast amounts of heat generated but not currently captured for use by London's incinerators in Lewisham (SELCHP) and Enfield (Edmonton). Additionally there are currently no plans to use the heat from London's third incinerator at Belvedere, in Bexley, which is expected to open in 2011'. The Authority believes that whilst there have been many EfW plants that are heat 'enabled' we have not previously been very successful in the UK at delivering Combined Heat and Power. **A key reason is that we often set up projects with only one energy solution in mind with no flexibility to switch if they do not work out in technical or commercial terms.** The Authority has also conducted an assessment of the heat demand within the Upper Lea Valley (ULV) area where the Edmonton EfW is located and has found that the potential heat supply significantly exceeds the projected demand. Likewise the LDA produced an energy strategy report of the ULV area and drew the same conclusion. District heating networks may well provide an opportunity for local energy use, but it will always be necessary to demonstrate that such schemes are better financially and environmentally than linking the fuel use to industrial and commercial processes that have substantial energy demand. Significant investment is required in infrastructure to deliver district heating, including meeting the challenge of re-engineering energy supply in existing housing stock. We must recognise the discretion that consumers have on buying their energy supply. Additionally there is a need to recognise the seasonality of household energy demand. Finally, there is a need for energy suppliers to be prepared to take the commercial risk on energy supply. All these considerations are to be taken into account at a time when local authorities are required to deliver huge budget savings, when waste disposal authorities are trying to manage the spiraling costs of landfill tax and new carbon taxes, and when the London Development Agency budget has seemingly disappeared.

- The Mayor should therefore be aware of these barriers to developing combined heat and power and should therefore not prevent local authorities from implementing sustainable waste disposal solutions on the basis that they are not heat enabled where the local authority has demonstrated that there are significant barriers to enabling heat use. It may well be that in some situations these barriers will disappear at some point in the future.

- The Authority notes that there is reference in this strategy document to retrofitting the EfW at Edmonton to introduce heat-use infrastructure and improve the incinerators' overall efficiency, however as noted above, enabling heat use without customers for the use of the heat is not a viable process.

d) Civil / Process Contractors

- A risk of there being a lack of skills / unavailability of contractors to develop EfW (thermal treatment and AD) projects from conception through to commissioning and operating.

- To some extent, a slow pace of skills transfer of European and International expertise and experiences in to the UK.

e) Public perception / public support

- **North London Waste Authority Evidence**

Notwithstanding terminology and scope, public perception is a key barrier to increasing EfW capacity in any form. As an example, the Authority's Outline Business Case (OBC) for PFI credits assessed a range of scenarios/possible different combinations of facilities and technologies for managing municipal waste in North London in order to meet the targets set. The scenario assessment concluded that any scenarios which would see the construction of a new thermal treatment plant or an EfW facility with a combined heat and power facility adjacent to the existing incinerator at Edmonton in North London, with concurrent operations, would be viewed as significantly increasing the Edmonton site's waste processing capacity. Scenarios with this arrangement were assessed as 'carrying a very high risk' of planning deliverability.

As outlined in the OBC:

"*Notwithstanding the limited remaining operational life of the Edmonton EfW, under these scenarios the thermal processing capacity of the site would be viewed as increasing significantly for an indefinite period of time and the planning application would be likely to attract major objections from the community and other stakeholders. As such, the Authority is not confident that these scenarios could be delivered within an acceptable timeframe and would result in a very costly process.*"

It was additionally concluded that the same assessment would equally apply to the establishment of an EfW facility at two other sites in north London– Pinkham Way and/or Hendon.

There are also a number of existing campaigns and web-based information sources opposing EfW – particularly thermal treatment including the UK Without Incineration Network at www.ukwin.org.uk.

Three recent reports namely, the Review of Environmental and Health Effects of Waste Management (DEFRA), The Impact on Health Emissions to Air from Municipal Waste Incinerators (Health Protection Agency) and the Update Statement on the Review of Cancer Incidence near Municipal Solid Waste Incinerators by the Commission on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (CoC) demonstrate that there is minimal health risk with siting a thermal EfW facility close to people. The findings of these reports need to be publicised so that people can understand that EfW does not present a threat.

f) Clarity of the Policy Framework

The policy framework currently supports some types of EfW and is less supportive of other types of EfW and this may be a future barrier to increasing EfW capacity in the future. As an example, the Authority's OBC references the planning policy framework within the London Plan, the spatial planning strategy for the capital. The scenario assessment work referred to above notes in its concluding remarks under 'planning deliverability' …..

"…*the lack of support for incineration as evidenced by Policies 4A.21 and 5.17 within the London Plan which supports advanced conversion technologies for waste in preference over conventional incineration*."

Therefore the policy framework may be such as to support some types of EfW over others and this may be a barrier in the communication about types of EfW which the policy framework does support and which Government evidence says can be safely employed.

g) Electrical export / cost of CHP

An off-take of heat is also required. Power can be exported to the grid, but if there is no market / customer for the heat as discussed above then benefits may not be realised, thus deterring the uptake especially as planning policy nowadays dictates that facilities should be designed with a heat off-take in place. There therefore needs to be an investment in heat infrastructure and financial support as the cost of heat pipes is typically between £1M and £5M per kilometer.

The London Development Agency (LDA) is working on the Thames Gateway Heat network which is to be designed to allow for heat users and heat suppliers to connect to. Our understanding is that it will take up to 15 years to be fully ready. **Government needs to invest more in these types of developments to provide the infrastructure for those looking to supply heat. There is now uncertainty as to whether this will happen following the news that the LDA is cutting two-thirds of its staff as a result of the government's Spending Review and will close in 2012.**

h) Outputs from EfW

Some of the outputs from EfW plants are:

- Incinerator bottom ash (IBA); and
- Air pollution control (APC) residues – these are classified as hazardous

In order to make an EfW project feasible and economically beneficial there is a requirement for sustainable, low cost outlets for these outputs. IBA constitutes 15-25% of input waste to an incinerator. IBA is commonly processed and then used to replace primary aggregates such as gravel. A quality protocol is to be developed by the Environment Agency for those who process IBA. Ensuring there is a market for IBA ensures EfW projects remain feasible. APC residues are considered as hazardous and are disposed of in suitable facilities. More should be done to encourage low-cost outlets for the treatment of APC residues and the disposal of any resulting outputs from the treatment process.

i) Process Innovation

We note that the strategy document states that *'New opportunities exist for using advanced conversion technologies such as anaerobic digestion, gasification and pyrolysis. These are now available commercially and the government is offering incentives for their use through mechanisms such as Renewable Obligation Certificates'.* Advanced EfW technology such as gasification is being developed and operated in other countries. However, in the UK, there seems to be some reluctance in the use of technology that has not been operating on a similar feedstock and at a similar throughput (tones / year). Most funders look for proven technology with a strong operating track record. **NLWA's view is that there is no evidence to demonstrate that advanced technology such as gasification and pyrolysis is operating commercially and successfully on a large scale within the UK and as such are currently unlikely to be bankable as solutions for large volumes of residual waste.**

The Objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The NLWA believes that these are the correct objectives and has the following comments on each of the objectives:

Objective 1

Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

NLWA Comments:

- The GLA is in a good position to deliver this commendable objective via the "Recycle for London" (RfL) campaign, with funds awarded by LWaRB. Boroughs can also bid for RfL funds to increase participation in local services. However, LWaRB now only has £22.9 m of its original £73.4 m pot left which is not much to deliver this objective across the capital and although NLWA welcomes the use of LWaRB's funds to provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London we ask **that the Mayor places a greater influence on directing London's waste and recycling fund directly to waste authorities**. We are concerned that public funds are being used to finance investment in private sector facilities handling commercial waste with limited/no benefit returning to the public sector in some cases. Waste facilities have fairly discrete geographic catchment areas so that the element of price competition between LWaRB supported facilities (as well as with non-LWaRB supported plants) is likely to be minimal leaving the public sector with little/no benefit, even in terms of competitive gate fees from the supported facilities.

Objective 2

Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.

NLWA Comments:

- A commendable objective.

- However, there are difficulties with measuring the carbon impacts of London's municipal waste and having a high level of confidence in the data. In particular:

a) there are substantial differences in the CO_{2eq} figures for different disposal / recovery / recycling processes between different sources of data and

b) different calculation methodologies for CO_{2eq} make quite considerable differences to the outcomes of the calculations. For example, the Authority's calculation of its CO_2 impact in 2009/10 compared to 2008/09 showed a 10.6 % reduction in emissions on the basis of National Indicator 185 measurement and reporting approaches. However, this was a year in which the Authority incinerated 28% less waste than the previous year, i.e. landfilled more than the previous year. The apparent benefit of landfilling more waste is most likely be the result of externalities to the NI185 framework, rather than a benefit in real terms. NI185 does not take into account the emissions arising from the breakdown of landfilled waste, or the carbon saving potential of the energy generated by the Edmonton incinerator. While it should be noted that the footprint also excludes CO_2 emissions from the incinerator stack (arising from the combustion of waste to produce energy), it seems likely that overall the externalities to the model will eliminate and perhaps reverse the benefit of landfilling compared to incineration. This illustrates some of the issues with this particular methodology for calculating CO_2 emissions.

Objective 3

Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.

NLWA Comments:

- A commendable objective. However:

- The Mayor should not ignore the additional collection costs associated with achieving high recycling rates which are increasingly likely to exceed the economic value of diverting additional materials from waste disposal as higher rates are reached. The strategy appears to count economic benefits of high recycling rates rather more thoroughly than the costs involved in achieving them. And whilst the costs will be borne by London's waste authorities, not all the economic benefits will flow back to them.

- The Mayor should also recognise the need for energy networks to facilitate the efficient generation of heat and power from waste and realise the benefits as described in the strategy.

Objective 4

Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

NLWA Comments:

- This objective should be secondary to objective 2 above. If the impact of London's municipal waste management on our environment and its carbon footprint can be reduced by managing parts of it outside London's boundary (including transport related impacts) and additionally if it commercially beneficial to do so, there is little reason not to do so. **Much also depends upon the definition of 'managed in London' as outlined within the London Plan.**

- In the absence of investment in energy networks, this strategy must be sufficiently flexible to recognise the benefits that can be achieved from a national perspective by for example taking London's waste outside of the capital. For example, if a heat network is established outside London with a heat user, there is little reason not to make use of this opportunity if no such opportunity exists within London.

The Mayor should additionally focus on the following:

a) Better Design

Waste reduction cannot occur on a significant scale without action from the manufacturing industry. The Mayor should use his influence to urge for an increasing focus on producer responsibility programmes to drive improvements in product design, to help local authorities and WRAP influence consumer behaviour and to ensure that the responsibility for waste management and prevention is shared amongst producers and local authorities. Better design and material choice plays a key role in minimising the creation of waste not just at the point of disposal, but throughout a product's lifecycle, and should therefore be something the Mayor is actively seeking and lobbying for.

b) Financial Investment in Waste Disposal Authorities

The Mayor's strategy document talks about the assistance that LWaRB can provide, however, it also recognises that *'Given the extent of the capacity gap and the capital cost associated with infrastructure development, the board's fund is only capable of supporting partial fulfilment of the "gap" requirements'*.

As highlighted above the following statement is no longer correct following the CSR *'In addition to the 930,000 tonnes of infrastructure to manage some of London's municipal waste that has already been granted planning permission, the GLA is also aware of Private Finance Initiative (PFI) funding supporting waste infrastructure to manage 1.3 million tonnes of London municipal waste each year beginning 2014'.*

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision

Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy

The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

Target 1

To achieve zero municipal waste direct to landfill by 2025

NLWA Comments:

- A commendable target which NLWA supports in principle.

Target 2

To reduce the amount of household waste produced in 2008/09 from 970 kg per household to 790 kg per household by 2031. This is equivalent to a 20% reduction per household.

NLWA Comments:

- Reducing the amount of household waste is a commendable aim and from a north London perspective the targets for reduction and reuse seem ambitious and challenging enough to drive improvement. There are however, two fundamental points that need addressing before this can be implemented. The first is a clear and unambiguous definition of household waste. The second is the methodology used to measure the amount of household waste within a mixed municipal waste stream, as methodologies used in London vary significantly and may give relative advantages to some areas compared to others. We understand that the Waste and Resources Action Programme (WRAP) is anticipating issuing some guidance shortly on the co-collection on household and non-household waste and measuring the tonnages of each as a result, but a single, common methodology would have to be agreed.

- In 2008/9 NLWA households produced 906 kg waste/household, so the target translated to NLWA is approximately a 13% reduction, **however, the Strategy does not contain proposals sufficient to ensure that an overall 20% reduction per household will be achieved**. Also, for the targets to be realistic, investment in infrastructure as well as behavioural change is required; they can be achievable as long as they are supported with an accurate and robust system for monitoring and recording, an appropriate level of effort on communications to impact on material demand and a supportive national framework to influence supply. Additionally, assistance and further investment should be provided to overcome barriers which have been previously identified and may prevent local authorities from achieving their targets:

a) Lack of investment/ market gaps – in particular areas of London; without the infrastructure, the targets will be difficult to deliver.

b) Lack of information to consumers.

c) Lack of adequate marketing of reuse and repaired products and consumers' lack of trust in reuse and the quality of repaired products; the sector needs to raise its public visibility.

d) Operational issues/the capacity of reuse organisations including the difficulties of matching supply and demand across London.

e) Costs – when it is less expensive for someone to buy a piece of flat packed furniture new compared to buying a reconditioned second-hand item, then there is really no incentive to reuse.

f) Potentially therefore another barrier to achieving the targets for reuse in particular could include finding a sufficient market for reused items if collection for reuse increases.

- The number and type of materials included in the target will also determine whether the targets are achievable. According to the "-100 kg European Campaign for Waste Reduction[6]" (which the North London Waste Authority signed up to support as part of its participation in the European Week for Waste Reduction), a series of preventative actions carried out on four waste streams (organic, paper, packaging and bulky waste) have a reduction potential of 100 kg/year which is equivalent to a 16 per cent reduction. Therefore, identification and reduction potential of materials to be targeted will also determine whether it is realistic for local authorities to achieve the targets.

- **Furthermore, waste reduction targets cannot be achieved without action from the manufacturing industry**. Better design and material choice plays a key role in minimising the creation of waste not just at the point of disposal, but throughout a product's lifecycle. Increasing focus on producer responsibility programmes to drive improvements in product design is vital to help influencing consumer behaviour and to ensure that the responsibility for waste management and prevention is shared amongst producers and local authorities.

- **The Strategy should recognise the limited impact London's waste authorities can have on influencing the quantities of household waste requiring collection**. In particular, levels of economic growth and industry measures to reduce packaging waste are likely to have substantial impacts on waste arisings.

- It is inconsistent that waste reduction targets in a "municipal waste management strategy" a key aim of which is to "…reduce the amount of municipal waste generated by the Capital…" should only apply to the household waste element of it- Why not set targets for reducing municipal waste?

- The Strategy's support for the introduction of national deposit schemes for bottles and cans could help towards achieving this target by removing them from the household waste stream. However, this would also make the achievement of high recycling targets for municipal waste more difficult. If a national deposit scheme is introduced, it may be necessary to revise recycling targets downwards.

Target 3

To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent)

[6] http://www.acrplus.org/-kg

a year in 2012 and 120,000 tonnes (three percent) a year in 2031.

NLWA Comments:

- It is not clear why the target set is to *provide capacity* rather than to actually utilise the capacity.

- The capacity tonnage targets appear over-optimistic, particularly in light of recent cuts to LWaRB funding.

- On page 75 the second bullet point under Proposal 1.1 refers to the Mayor setting a target to achieve actual levels of re-use rather than capacity for re-use as above.

- Much "re-use" occurs before items are discarded and become "waste" (e.g. through the private sale and exchange of second hand goods). As such, "re-use" can be considered an option that sits above the Waste Hierarchy as well as within it. The strategy could propose to do more to promote the re-use of goods before they get discarded as waste (e.g. through promoting private re-sale via EBay, car boot sales etc) even if this is strictly beyond the scope of a waste management strategy.

- It should be noted that items collected for "re-use" are not "waste" and that this may affect some of the Mayor's calculations.

Target 4

To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% by 2031.

NLWA Comments:

- The first two of these targets are contained in the National Waste Strategy for England published in May 2007. However, the contribution different regions are expected to make towards the achievement of national targets should reflect their local circumstances. In London's case, this should mean a lower than average contribution, reflecting the low level of compostable garden waste in London's household waste stream and the particular difficulties of achieving high capture rates at flatted premises and in households with limited space for storage. However, at Appendix 3 page 2, it states that "*The Mayor's targets are more ambitious than those set by the Government and reflect regional circumstances, such as the declining landfill capacity accepting London's waste; the need to significantly improve municipal recycling or composting performance- London is the lowest performing region in the UK; and the need to significantly increase the amount of waste managed within London to achieve greater self sufficiency in line with Planning Policy Statement 10."* This seems to miss the point that London is the lowest performing region <u>because</u> of its low level of garden waste arisings and high level of flatted premises. The other two reasons given for the high targets could be alternatively addressed by increasing London's residual waste recovery capacity. Figures 4, 5 and 6 illustrate this point well- London's dry recycling performance is only slightly below average but cannot achieve high composting rates, especially in inner London, due to the low level of garden waste and high number of flats. The recycling column in Table 1 (page 40) should be split into "recycling" and "composting" to highlight this further.

- The 60% target goes above and beyond national and European targets and its achievability without incurring excessive cost is questionable.

- At Appendix 3, page 2, it is stated that "*The Mayor's targets are for London to achieve as a whole, placing no requirement on individual waste authorities to achieve them."* This should be stated clearly within the "Policy 4" section of the Strategy, but is not.

- The particular contributions the Mayor expects individual boroughs to make towards the achievement of these targets is unclear, but outer London Boroughs collecting large quantities of compostable garden waste and with lower proportions of flatted premises can reasonably be expected to make bigger contributions.

- The Strategy should make it clear how the sum total of borough contributions towards achieving improved recycling rates will ensure that his targets are met.

- Applying these targets to municipal rather than household waste may create a perverse incentive for boroughs to increase their competition with privately operating licensed waste carriers providing commercial waste recycling services, thus attracting more (recycled) waste into the municipal waste stream and making it harder for London to reduce its municipal waste. Presumably this is why the target for waste reduction is limited to household waste only.

Target 5

The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately:

1.2 million tonnes of CO2eq in 2015
1.4 million tonnes of CO2eq in 2020
1.6 million tonnes of CO2eq in 2031

NLWA Comments:

- A commendable objective, however, there is significant doubt about how accurately carbon equivalent emissions can be measured and close analysis of the carbon benefits of some initiatives designed to achieve the Mayor's high recycling targets may indicate little if any benefit from them e.g. the separate collection of food waste for recycling.

- At Appendix 4b, it appears that the current CO_{2eq} annual emissions figure of 130,000 tonnes for London's municipal waste management activities overall excludes collection related impacts. The figure should therefore be presented as a figure for "London's municipal waste disposal and treatment activities overall" or be revised upwards to include collection related impacts. It is important that this should be clear in the main Strategy, as most people will not read the Appendices.

- On page 89 there is a reference to the "…emissions-saving effect of recycling and composting activities." Table 5 on page 92 shows an emissions saving effect for in-vessel composting but not for open windrow composting. It would therefore be helpful to insert the word "in-vessel" before "composting" in the statement on page 89.

Target 6

To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.

NLWA Comments:

- NLWA recognises that this target refers to waste after recycling and composting targets have been achieved, however, there may be a better case for the organic proportion to be composted than for energy to be generated from it for example through community composting schemes or through the use of IVCs.

- NLWA questions how this would be measured and how would we recognise the point at which "as much energy as possible" was being extracted? It would be preferable to set a target in terms of e.g. kilo-joules generated or percentage increase from a baseline.

- If a target is not set in terms of kilo-joules generated or percentage increase from a baseline, then "…as much energy as possible…" should be more closely defined or replaced with "…as much energy as is reasonably practicable…" or similar.

- There is a danger that the Mayor's preference for emerging new technologies over incineration with energy recovery could result in more waste than necessary going to landfill, either because the new technologies fail to deliver as promised or because local authorities are unable to afford them. Unless viable technology is being offered by the bidding community then this aspiration cannot be achieved. Although this strategy purports to be technology neutral the Mayor's preference for emerging new technologies counteracts this. The strategy should be revised to be completely technology neutral and allow the bidding community and the market to respond with bankable technology to deliver output based contracts.

- The Mayor's commitment to utilising waste heat from EfW processes e.g. through the provision of district heating ring main piping systems (as exist in Paris and Amsterdam) as detailed at pages 129-130 of the Strategy is welcomed. Realistically however, the prospects of this actually being delivered still seem remote, especially given the imminent demise of the LDA and its central government funding.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

The proposal of the London Community Resource Network's (LCRN's) to provide a more consistent reuse service across the capital fits well with the new draft municipal waste strategy for London and with work carried out to date in north London. The development of London Reuse Network (LRN) aims to increase the amount of material both collected and reused and includes proposals for an integrated network of reuse facilities working together in a coordinated system to hold commonly owned assets and deliver public and commercial reuse services.

The north London work[7], which has been funded by the Authority, indicates that there is a capacity gap in terms of the ability for the existing organisations in north London to collect sufficient material to maximise reuse. The Authority considers that this proposal from LCRN would be an effective way in which to develop the sector and provide support to increase reuse rates and provided a letter of support for the LCRN's proposal and funding request to the LWARB for the development of a pan-London Reuse Network.

[7] Reuse Synergies and Opportunities in North London, Expanding Reuse Provision in the NLWA, LCRN, September 2009

Apart from resolving the capacity gap, a consideration for the future is how the proposal would enable centralised publicity campaigns to be undertaken to raise awareness of residents about the reuse services available to them. We understand that Recycle for London will be carrying out some of this promotional work to promote reuse, but it is important given the ambitious targets on reuse that this work is continued. The current scope of the proposals includes furniture, white goods (such as fridges and freezers) and other electrical goods. In the longer term the service may be expanded to incorporate textiles, but as with reuse and repair services, it will be important to look at existing private sector operators who may already be doing much good work.

The other area in which the London Reuse Network could assist with is the area of public sector procurement. Sometimes the tonnages of material that can be diverted through local reuse services are very small, insufficient perhaps to justify the procurement of a separate reuse service from a tonnage perspective alone. However, if the social benefits of the service, perhaps in providing training opportunities through a repair and refurbishment service, in addition to consideration of the benefits of providing refurbished household items for people in need are also taken into account, then the reconfiguration of contracts to include reuse may be more attractive. The structure of local authorities does not easily facilitate this type of cross departmental consideration of the benefits of a service or ease procurement processes in this regard. It might be possible that LRN might also contribute to providing greater opportunities for third sector organisations and small businesses in terms of both bidding for and providing reuse services to the public sector in London.

Finally the Authority considers that the reuse sector in London could also be effectively developed by supporting some of the existing networks that exist for other reuse services in addition to furniture. In particular, support for online reuse networks such as Freegle and Freecycle would be beneficial as would promotional support for accredited repair and reuse centres. In north London for example, the Authority has worked with LCRN to produce a small leaflet listing local reuse services which was distributed to residents at give and take days across the seven north London boroughs, thus providing information to residents about other opportunities for reuse in their area throughout the year.

Additionally another issue with the reuse capacity gap is finding outlets for the refurbished items particularly furniture and white goods. Even if the capacity exists, reasons such as consumers' lack of trust in reuse and the quality of repaired products may mean that reusable items are not being purchased.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

N/A

6. Any further comments on this policy?

It is commendable that the Strategy includes a policy to inform producers of the value of reducing, reusing and recycling. However, one issue which would enable this to happen more easily would be if there was some standardisation of colour coding systems used for collecting different materials across the capital. It is recognised that local circumstances vary and that accordingly collection systems will vary across London, however, promotion would be considerably eased if it was possible to improve the standardisation of container colours used. There is potentially a role for the Mayor in modelling an assessment of the cost and any practical implications of such an approach.

Whilst the London boroughs are the prime interface with the public on recycling and reuse, the waste disposal authorities in the capital also have a role to play in the delivery of this policy - in

north London for example all partners are equal delivery partners in terms of the joint waste strategy.

A final comment is that the Localism Bill outlines that the Mayor of London will be required to produce a document known as 'The London Environmental Strategy', detailing his general assessment of the environment in greater London and including proposals for municipal waste management policy. It is unclear, and given the timing of the municipal waste management strategy consultation understandable, how this broader environmental strategy will work alongside the Mayoral waste strategies for both business and municipal waste.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

I. NLWA commends the move towards carbon-based outcomes and acknowledge that the EPS and the carbon floor are innovative approaches to the way London seeks to manage its waste arisings in the future. NLWA also welcomes a focus on climate change in waste management practices and supports a move away from tonnage based targets towards carbon-based

outcomes. NLWA therefore supports this policy in principle but believes that there are a number of significant issues to address before it can be relied upon in practice to reduce the climate change impacts of London's municipal waste. **NLWA also requests that a separate consultation is undertaken with stakeholders on the EPS once the GLA has identified how the EPS will work in practice. Sufficient information and scientific evidence to support the introduction of the EPS should be provided and in the meantime the strategy may want to acknowledge that the EPS is 'work in progress' and subject to review, with the Mayor's proposal downgrading the Emission Performance model to an advisory tool which waste authorities and relevant parties can use voluntarily.**

II. The significant issues identified include:

a) Over what timeframe will this 'whole system' approach be introduced?

b) How will it be applied or enforced across existing or new waste management options?

c) How will the additional cost be met at a time when boroughs and waste disposal authorities are faced with significant budget cuts?

d) How does the EPS work alongside EU tonnage based targets?

e) What happens if the minimum EPS is not achieved?

f) Have the resource implications of using the tool been calculated together with associated costs?

g) How does the EPS apply to waste which is managed and converted to SRF in London and utilised outside London?

h) There are a number of assumptions forming the 'evidence' base for this Standard which do not provide satisfactory rigour on which to base an enforceable standard over the life of the Mayor's Strategy. It also appears incomplete due to the omission of reuse figures – and reduction figures beyond Mayoral targets.

i) The underlying model appears to lack appropriate cost modelling and an impact assessment of the implementation of this 'Standard' for London's waste authorities. For example, the assumptions for the cost of waste management to the average London tax payer reflected in the Strategy is widely exaggerated. We believe that the costs for waste authorities will be significant as they will be required to change management practices in order to meet this ancillary standard. Additionally, the Mayor has assumed steady market positions for recyclates but in reality, given the nature of local authority waste contracts, this may not be realised.

j) The data behind the Mayor's standards is based on reports from a single consultancy, without peer group review, and includes some significant assumptions (some in contradiction of Government guidance). As a result there would be a benefit from further consultation and review before all future requirements are firmly based upon these proposals.

k) It is our understanding that the EPS has been set based on the Mayor's waste reduction and recycling targets and that each London authority may be required to meet/exceed the EPS, in which case London as a whole would exceed both the standard and the recycling and waste reduction targets. So whilst the strategy suggests that the Mayor's reduction and recycling targets are aspirational, the requirement to meet/exceed the EPS means that in reality London's individual waste authorities will be required to meet the Mayor's waste reduction, and recycling targets.

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l) It should be noted that the Mayor of London's waste Hierarchy is only a guide- *"…the scenario that performs best in CO_{2eq} emissions terms should be given preference."* (p55). For a CO_{2eq} performance standard to be useful, the data for different processing options needs to be reliable. The size of the variations in the figures for kg CO_{2eq} per tonne between Table 2 in the Assembly draft and the Public Consultation draft suggest a high degree of uncertainty may exist. And not all the data in Table 2 matches that provided by Defra on its website at:

http://www.defra.gov.uk/environment/business/reporting/pdf/101006-guidelines-ghg-conversion-factors.xls (updated Oct 2010).

m) On p53 it states that Table 2 "…*shows the potential lifecycle performance of different waste management methods for various waste materials.".* However, it appears that the figures take no account of the additional collection impacts involved with collecting different material streams separately (e.g. additional vehicle movement, slop bucket and caddy liner related impacts). The Strategy should make this clear. These impacts may have a significant effect on which option is identified as having the lowest lifecycle impacts and excluding them will only encourage solutions with high collection related impacts to be adopted. That could have serious implications for London's air quality and traffic congestion.

III. In pursuing Policy 2, NLWA believes that the Mayor is effectively subjecting London, which as he readily notes is underperforming with regards to meeting waste targets compared to the rest of the country, to a more stringent framework for waste management than the rest of England. The Mayor contends on page 95 of the draft Strategy document that 'generally, achieving high rates of recycling and composting aligns with achieving the EPS'. Why therefore does he feel the Strategy needs to set performance for both?

IV. NLWA requests that the Mayor changes the wording of Policy 2 and its related proposals and targets to reflect that the EPS is not a compulsory standard but an advisory tool. The Mayor should view this as a tool to help to set the tone for the future of London's waste management rather than a requirement for waste authorities in order to be in conformity with this Strategy.

Proposal 2.1

The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

NLWA Comments:

- "Greatest possible" is open to interpretation and should be more closely defined. The greatest possible CO_{2eq} savings are only achieved once all waste has been eliminated and as more waste is moved up the hierarchy, the marginal cost of moving further waste up the hierarchy is likely to rise, eventually to a point where to do so does not represent a cost-effective environmental gain. "Greatest possible" should perhaps be replaced with "substantial".

Proposal 2.2

Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

NLWA Comments:

- The statement that "*The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost."* is confusing. Whilst the costs of adopting more carbon efficient approaches are expected to be less expensive, according to the draft Strategy, than working with more carbon intensive options it is unclear how the EPS would take account of cost information.

Proposal 2.3

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.

NLWA Comments:

- Any minimum CO_{2eq} performance standard for energy from residual waste should be set at a level so as to ensure that processes classed as "recovery" under the 2008 Waste Directive are generally able to comply with it.

- There is no disagreement with the principle that London's municipal waste, used for energy generation, should have a carbon intensity less than, or equal to, the source of energy generation it displaces. However, there are two major concerns with this proposal:

  - The first concern is that technology for EfW is being compared with technology for fossil fuel generation. These are two different technological categories. One can strive to select the best EfW technology but this is not in the same category as fossil fuel technology and there is the danger that the Mayor is setting too high a hurdle for EfW technology.

  - The second concern is that the Mayor has decided that it is energy generated by "combined cycle gas turbine (CCGT) plant" which will be displaced. CCGT is very efficient and is assumed to generate electricity at a carbon intensity of 387g CO_2 per kilowatt hour (CO_2/kWh), this compares with a national grid mix of around 517g CO_2/kWh. Additionally the modelling within WRATE assumes displacement of an assumed national energy mix, so the approach of the EPS should be consistent with this, rather than using CCGT as the displacement metric. In reality, EfW will displace coal fired power stations (around 40% of the grid mix) which produce over 900g CO_2/kWh and will struggle, by a 2015 deadline, to comply with the EU's 'Large combustion plant directive'. **A reliance on power from imported gas also leads to concerns on the security of national energy supplies so the production of energy from waste should be viewed within the context of providing energy security as well as managing waste.** Finally this benchmark is based solely on this one study which underpins the strategy. The implications are so important that there must be time to evaluate the study and its conclusions if for no other reason than to ensure that there

is a very firm basis for the Mayor's reliance on one option which has no Plan "B". There are organisations that serve London that have the expertise to provide the "challenge" and time must be allowed for such a challenge. We can deduce that this proposal is trying to encourage heat and power and move away from electricity only generating stations, however, the Mayor should be cognisant of the issues around this particularly the 'chicken and egg' situation we find ourselves in whereby planning may not be obtained for EfW facilities if they are unable to demonstrate a suitable heat offtake, but on the other hand if there is no enabled facility in the first instance and infrastructure (energy network) then it is unlikely that a heat user will come forwards. The Mayor needs to play a part in order to achieve this vision. We note the Mayor's powers in the Localism Bill which enable him to designate any area of land in London as a Mayoral development area and the Mayor can play a part for example by demonstrating that heat will be made available in a development area and the infrastructure will be in place for heat suppliers and users to access.

- The EPS assumes energy will be recovered from 'low carbon' waste sources (e.g. food, via his preferred but unproven technology mix) coupled with increased recycling of fossil fuel based materials such as plastics and textiles. The Mayor's consultants acknowledge this could lead to a requirement for separate food waste collections, kerbside sorting of recyclables (associated traffic congestion) and, to help balance the costs, fortnightly residual waste collection. This translates to a heavy financial burden.

- The Mayor's advisors have admitted that London boroughs are not currently meeting the EPS, and changes will be required, but no evidence of what this will cost has been provided. Local authorities will not have the resources to provide any waste service that is not based on good economic grounds. No data is currently available that provides evidence that extracting energy from food and green waste is less beneficial in all the circumstances than recycling, yet the Mayors strategy is forcing local authorities to provide these recycling services on the basis that the carbon saving is significant and therefore there is an overall cost saving.

- The consultants report makes it very clear that unless the so called "best practice" is adopted such as AWC and kerbside sorting then none of its modelling is reliable. Many authorities in London, particularly in Inner London, will not be able to adopt this best practice. The Mayor must consider the reality of London and ensure that landfill is avoided, energy is recovered and recycling is encouraged without London incurring costs it can ill afford at this time.

- The Strategy should recognise the time lags involved with procuring waste disposal facilities and their long operational life spans. It may be unreasonable to expect NLWA to "…have steps in place to meet (the EPS) in the near future." In practice it is likely that this could only be achieved at excessive cost.

Proposal 2.4

The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

NLWA Comments:

- A commendable proposal although the more simplified any tool is, the less accurate it is likely to be. Also, the Mayor should note that any tool can only be as good as the data

behind it, but the range of different CO_{2eq} performance figures for different processes across different data sources and the regularity with which the data gets updated and changed casts significant doubt over how reliable any such tool could be. Disagreements regarding whether particular authorities are meeting the EPS thresholds based upon the use of the tool are likely to occur, particularly where authorities are very close to achieving the required standards and if there are uncertainties over the reliability and accuracy of the ready reckoner. Accordingly the Authority would recommend that some guidance is provided alongside the publication of the tool, together with information about possible areas where some professional judgement may be used where there is uncertainty.

- Although the Authority commends the development of a web-based tool that will be accessible to all Boroughs, we do have some concerns about how useful this will be to accurately model performance against the EPS, as users will not be able to change assumptions about key technological aspects (such as energy efficiencies, mass flow, emissions performance etc) and will only be able to rely upon the data already contained within the tool. The Authority believes that the web based tool will be useful to allow Boroughs to compare the performance of different waste management processes, but not to accurately compare their performance against the proposed EPS. The Authority would like this section to be updated to reflect that *Boroughs can either use the web-based tool or WRATE to determine their performance of their municipal waste management activities against the proposed EPS*. This would allow Boroughs to use WRATE to develop bespoke and user defined processes if they wish. The Authority would like the GLA to consider if they would be prepared to offer a peer review service of any WRATE models submitted. We also request that the GLA makes the WRATE files used to set the EPS available. The Authority would also like to know if the web-based tool will be updated at the same time as data on processes are amended or introduced in WRATE.

- It appears that in some instances that this strategy does not recognise the varying positions local authorities are in in terms of decisions on technology, collection systems and baseline starting points as far as waste and recycling is concernd. The strategy should also recognise the budgetary pressures on waste authorities and although the aspirational targets are laudable the strategy will only work effectively on the ground if everyone has the same opportunity to reach the targets. The Mayor's should avoid creating unnecessary hurdles for local authorities which mean that they fall foul of the strategy.

Proposal 2.5

The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

NLWA Comments:

- A commendable proposal. However, by failing to take full account of collection related impacts (e.g. in Table 2) the Mayor may inadvertently encourage adverse impacts on London's air quality by encouraging collection intensive solutions.

Proposal 2.6

The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

NLWA Comments:

- This is a commendable proposal, however, we would like to see how this works in practice.

8. Any further comments on this policy?

The Mayor's Waste Hierarchy

The Mayor's waste hierarchy' which is included as part of the approach proposed is different from both the European and national model. Whilst it is difficult because the Mayor's waste strategy is being developed at a time when the new Waste Framework Directive has not yet been fully transposed into the UK and as Waste Strategy 2007 is still in place, the Authority would recommend that the Mayor's approach should follow the new waste hierarchy in the revised Waste Framework Directive namely:

- Prevention
- Preparing for re-use
- Recycling
- Other recovery, e.g. energy recovery; and
- Disposal

In an already complex environment with respect to policy and legislation, the Authority recommends that the Waste Management Hierarchy enshrined within the Waste Framework Directive to be transposed to UK legislation by January 2011 is a more appropriate hierarchy to be followed.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

As part of the Authority's procurement process to secure services and facilities to manage municipal waste in North London for the long term, once its contract with LondonWaste Ltd finishes in December 2014, the NLWA investigated opportunities for joint procurement with neighbouring authorities. Our key reasons for looking into these options were:

- Could there be further economies of scale in establishing broader joint procurement contracts across a larger part of London?

- Might a larger procurement bring forward further additional, potentially beneficial solutions?

The key issues we identified as a result of this process were:

- Procurement timescales varied, which meant it was difficult to jointly procure. (Although the Authority notes that the Hertfordshire authorities have let recyclables sales contracts with staggered start dates for different authorities to overcome such issues).

- The economies of scale to be gained from joint procurement were already being realised at a NLWA scale, so there would be limited benefits of expanding the procurement to encompass other authorities. There is also a danger that contracts become too big for the market risk and it will be better to look at joint purchase of bins, vehicles etc as competition

is a serious issue if contacts are too big

Separately from the Authority's own experience, other issues regarding joint procurement of collection contracts for example may be:

- Securing agreement on how to handle the costs of change. For example if five collection authorities agree to procure a new recyclables collection service, but one of the five authorities has a different collection system with different containers or can only join the procurement at a later date, will the other four authorities agree to pay for the costs of new containers for the fifth authority or will the fifth just absorb the additional costs. And , if the fifth authority can only join the procurement at a later date will the other four pay for the termination costs of the fifth to allow all the partners to start the procurement at the same time, or will some other recompense or compensation be required?

- Facility hosting decisions. If a depot or other type of facility is required as part of a joint procurement, how will the decision be taken on hosting a facility used by all partners?

- Differing expectations of the partners e.g. in terms of costs, priorities for action etc.

- How best to formalise the joint procurement – with one authority taking the lead perhaps for procuring the contract, how are disputes handled for example? Some type of formal Inter-Authority Agreement is likely to be required. It is also important to recognise that there is a direct political association for example with collection which is public facing. i.e. there will be reluctance for individual authorities to be too divorced from an ability to influence contractual outcomes, particularly in the handling of resident complaints for example. Extremely large joint contracts may not support the level of authority/resident interface that smaller contracts are able to provide.

- Whilst these are barriers, the Authority has successfully jointly procured a number of contracts namely;

- Materials Recycling Facility (MRF) – Two MRF contracts were awarded to Greenstar UK and Bywaters Ltd. The contracts are for the recycling of 40,000 tonnes of commingled material collected each year in north London, an amount which is expected to rise to 70,000 tonnes by 2014. The procurement means that the Authority saves approximately £760,000 per year whilst delivering expanded recycling collections. The benefits of the savings flow back to the Constituent Boroughs via income share provisions.

- In-Vessel Compost Facility (IVC) - In 2004 the Authority was awarded £4m by the former London Recycling Fund (LRF) for an integrated compost project which comprised (i) £117k start-up funding for community composting projects and advice and support for home composting provided through a London Community Resource Network helpline, master composters and advisory workshops (ii) £2.2m support towards new organic waste collection services by its constituent borough councils and (iii) £1.7m support towards the construction of a 30,000 tpa in-vessel composting facility (IVC) by its main waste disposal contractor, LondonWaste Ltd, for mixed food and green wastes. The Authority's commitment to LondonWaste to deliver 30,000 tonnes p.a. until 2014 underwrote the LRF investment of £3.5m the LRF support being what was necessary at the time to make the IVC service affordable for the NLWA. The first organic wastes were delivered in September 2005, and the first loads of finished compost were delivered to borough parks and allotments in February 2006. The borough organic waste collection services have proved to be very successful, with the full IVC capacity being used in the first year, and third-party merchant capacity being used since then for the extra organic wastes. The facility was the first in the country to be certified as producing PAS100 quality compost, and its compost continues to be in great demand by north London allotment sites, parks and

community projects as well as LondonWaste's farming and landscaping customers.

- WEEE Contracts - Since July 2007 the Authority has been co-ordinating the recycling and disposal of WEEE from across its seven-borough sub-region with 1.7m residents. The Authority registered all the designated collection facilities and let a single contract under which tenderers competed on the grounds of service quality, given that European and national producer responsibility requirements meant the electrical and electronics goods industry would have to pay for it. The NLWA was able to secure additional promotional support due its size, and has been able to co-ordinate the implementation of this with its constituent borough councils.

- CA Transport - In 2010 the Authority awarded a contract for the collection and transportation of residual wastes from the nine civic amenity sites provided by its constituent borough councils, all under the Refuse Disposal (Amenity) Act 1979. The contract covers the basic service of providing the 40 m^3 waste containers and delivering the waste for disposal under the NLWA's main waste disposal contract with LondonWaste Ltd, but it has also been structured so that the borough councils too can take advantage of pre-tendered rates for the provision of similar containers for their recyclable and compostable wastes, and their delivery to the boroughs' nominated treatment contractors' facilities. The civic amenity waste transportation contract was awarded to LondonWaste, and by using the service for recyclable and compostable waste the north London boroughs reap the benefit of the administrative efficiencies and a rate competitively tendered across a seven-borough sub-region of London on behalf of local people.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

- A supportive policy framework

- Ability to access LWaRB funding. The size of funding available is the most important factor and the key issue tends to be the competitive funding approach that is taken for waste authorities to access the fund, i.e. there is usually a big fight for a small pot of money.

11. Any further comments on this policy?

The Authority has no further comments to make in this regard.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

Policy 4

Achieving high recycling or composting rates resulting in the greatest environmental and financial benefits.

NLWA Comments:

- For the most part, it is unlikely that any single approach would result in both the greatest environmental benefits and the greatest financial benefits - there will often be a trade-off between the two. As it stands, it is unclear whether this policy supports measures that achieve environmental benefits through recycling at a net financial cost. This policy would therefore be clearer if it were amended to "*Achieving high recycling or composting rates resulting in the*

greatest environmental benefit at acceptable financial cost."

Proposal 4.1

The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031.

NLWA Comments:

- The text below Proposal 4.1 on page 117 is confusing - Where recycling and composting delivers the best economic and environmental outcomes, surely local authorities will be inclined to consider this before energy generation even in the absence of the Mayor setting high recycling targets? And it would make more sense to say that, where energy generation and recycling/composting have similar performance in environmental terms, cost should be the deciding factor. And if cost related considerations can over-ride the Mayor's Waste Hierarchy, this should be clearly stated in Chapter 4 as is the ability for CO_{2eq} considerations to over-ride it.

- **North London Waste Authority Evidence**

All analyses relating to collection systems suggest that a 50% recycling rate for an urban environment such as North London is very challenging and can only be secured by maximising the contribution to recycling performance by significant enhancements to collection systems, significantly improving Household Waste and Recycling Centres (HWRCs) and securing a further contribution to recycling performance from residual waste treatment.

There are two significant issues that are likely to mean that North London may not be able to achieve the same recycling rates as are achievable nationally:

- Green waste is a smaller proportion of the household bin in North London than nationally arising from a relatively low number of private gardens, a large proportion of flatted properties without gardens and the gardens from those houses with them tending to be of a relatively small size. Recent composition work identifies that green waste is 10.22%[8] of household waste in North London compared to 20%[9] nationally;

- The large and growing proportion of flatted properties (including high rise apartments) which currently have a lower overall recycling rate than other properties, in part because of the lack of access to green garden waste as identified above. For example Camden, Hackney and Islington's proportion of flatted properties is 86%, 80% and 76%. The national average proportion of flatted properties is 19%.

NLWA is therefore supportive of policies that seek to maximise recycling, however, the above analysis shows the difficulties with achieving greater than 50% in the north London area.

Other issues include:

- Engaging with hard to reach communities and servicing them

[8] North London Waste Authority, Waste Composition Analysis Project for NLWA, Final Interim Report, ENTEC, August 2010.
[9] Dr Julian Parfitt, WRAP. Analysis for 'Waste not, Want not' 2002, available at http://www.defra.gov.uk/evidence/statistics/environment/wastats/bulletin09.htm

- communicating effectively with diverse populations especially due to language, socio-economic, practical and structural short-term barriers i.e. a mind set of 'if I do not recycle this small aluminium can it will not have a detrimental effect on overall recycling'.

- relatively high population turnover which requires constant messaging

- The Eunomia[10] report also acknowledges that meeting the proposed recycling targets does depend upon significant behavioural change, especially for residents in high density housing and thus measures must be put in place to assist this change.

- **Constituent Boroughs and the Comprehensive Spending Review**

Significant investment is required in Constituent Borough collection systems to deliver the recycling and composting aspirations and at a time when local authorities are required to deliver huge budget savings, it is difficult to see where this investment will come from to achieve the recycling and composting targets. The Eunomia report points out that *'In initial years, therefore, annualised collection and recycling costs increase significantly for Boroughs'*. This is the same period where Boroughs are being made to cut budgets by up to 30% and therefore the question is posed that how will Boroughs afford the investment in infrastructure that is required in early years?

Proposal 4.2

The Mayor, through the London Waste and Recycling Board's best-practice coordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

NLWA Comments:

- A commendable proposal. However, London's waste collection authorities should remain free to determine the design of the recycling services that they consider to be most appropriate for their borough.

- Households without gardens, which account for a substantial proportion of the total, will not have much use for composting services for garden waste.

- On page 118 it is noted that "…it is difficult to present an accurate assessment of London borough collection costs…". It appears that the Strategy consistently underestimates the likely additional collection cost implications of achieving very high recycling rates. The waste authorities working in their areas are better placed to present an accurate assessment of collection costs and it is somewhat inaccurate to make the statement that borough collection cost information does not exist as we believe it does, within the individual authorities.

[10] Economic Modelling for the Mayor's Municipal Waste Management Strategy, April 2010

Proposal 4.3

The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

NLWA Comments:

- This is a commendable proposal. However, a key issue for local authorities providing such a service is whether there are sufficient economies of scale, i.e. sufficient small businesses within their area to whom they can provide a cost effective service. If businesses requesting a service are scattered across the area, then it may not be viable to provide a separate service. Co-collections of business and household waste can work, but robust systems of measurement need to be put in place to ensure that estimates of the amount of 'trade' and household waste are as robust as possible.

- The Waste and Resources Action Programme (WRAP) now offers local authorities guidance in developing and implementing better services to local business communities. The activities of the Business Resource Efficiency and Waste Centre for local authorities (BREW) have been incorporated within WRAP's local government programme. This means that WRAP can now provide support to local authorities working with their business communities to improve their management of waste, recycle more and be more resource efficient. Any work that the Mayor proposes to do should be delivered with prior reference to WRAP – see:

http://www.wrap.org.uk/local_authorities/support_funding/trade_waste_recycling/index.html

It should be noted that this is a commercial issue and arguably the services exist if businesses can afford to pay and we ought to be cautious that we are not suggesting a subsidy. If funding is available, it should be directed towards educating businesses.

Proposal 4.4

The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

NLWA Comments:

- A commendable proposal. However, spread across London, this equates to around £150k per borough and will not prove sufficient to achieve the four fold increase in flats recycling by 2031 or the 3.5 fold increase by 2020 envisaged in Table 8 of the draft strategy. £150k within a London Borough with a high proportion of flats will probably only cover 1 or 2 estates which is not sufficient coverage.

Proposal 4.5

The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

NLWA Comments:

A commendable proposal. Previous research by Network Recycling (now part of Resource Futures) and Future West which resulted in the National Assessment of Civic Amenity Sites

(NACAS) report: http://www.resourcefutures.co.uk/content/national-assessment-civic-amenity-sites-nacas provided some early best practice advice and guidance. Further work has additionally been carried out by WRAP**. It is not the knowledge and ability to deliver increased recycling and composting rates at local reuse and recycling centres that is missing it is the funds to deliver that is lacking.**

Proposal 4.6

The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

NLWA Comments:

- Incentive schemes for recycling in the UK are still in their infancy. Their cost effectiveness along with extent of the role they can potentially play in achieving higher rates of recycling is still unclear, especially in the context of flats with communal waste storage and services already achieving high capture rates. It is also unclear how much of the increase in recycling observed with such schemes can be attributed to the existence of the incentive and how much actually relates to the high level of publicity promoting the incentive scheme .

- Some incentive schemes also rely on 'chipping' bins so that information can be recorded about the weight of the bin or the fact that it has been set out for collection. A significant amount of London's properties do not receive a wheeled bin service, so may be unsuitable for participating in such a system.

- Recycling incentive schemes are liable to attract more waste into the system, especially if applied to garden waste, with large disposal/processing costs attached. Additional waste can be diverted from elsewhere (e.g. home composting) or occur as a result of the additional consumption stimulated by use of incentives in the form of money off vouchers.

- Subsidies for residents to purchase home composting containers, "Green Cones" or wormeries may well be the most effective form of incentive and can help to reduce the quantity of waste entering the household and municipal waste streams. We however need to be careful that recycling does not become a reward culture rather than the 'right' thing to do. Also without recording methods at household level you will end up paying for what is currently achieved voluntarily.

- We would caution the introduction of RecycleBank or other incentive schemes in London if there is no means by which the additional recycling achieved as a result of the introduction of the incentive is measured. The incentives should in reality only apply to behavioural changes and not to current good practice.

Proposal 4.7

The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

NLWA Comments:

- The Authority commends efforts to increase recycling 'on the go' provision for a variety of reasons. Public place recycling bins help to promote and reinforce good practice (recycling) behaviour in the home and at work. Recycling 'on the go' adds additional recycling tonnage and helps to reduce residual waste for disposal in line with the waste hierarchy and because the provision of public place recycling ensures consistency of service across different aspects of life, bridging the home/work divide. Finally, public place recycling also reinforces the 'recycling' brand.

- The Authority supports the use of national 'Recycle Now' campaign branding on public place recycling bins. However, it is also important to recognise that many local authorities have invested heavily in local branding to promote a sense of place and community. Accordingly any branding guidelines need to be sufficiently flexible to allow for both local borough as well as national or pan-London 'Recycle Now' or 'Recycle for London' iconography to be incorporated, in addition to potentially allowing for sponsor information to additionally be included. In order to develop a sense of London as the recycling capital the Authority would recommend that any guidance on iconography incorporates the 'Recycle for London' rather than the 'Recycle Now' branding. This will be particularly important in the run-up to the Olympic and Paralympic Games in 2012 and the Rugby World Cup in 2015 when it would be helpful if visitors could see the same recycling message about recycling on the go across the city.

- Whilst limited networks of on-the-go recycling facilities for newspapers and magazines can be provided at acceptable cost, more intensive schemes catering for packaging containers tend to have very high collection costs as containers must be small to fit on-street and the packaging is low density, so the containers must be emptied very regularly but produce low tonnage per collection. They also tend to suffer from very high levels of contamination.

Proposal 4.8

The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

NLWA Comments:

- A commendable proposal, but the wording could perhaps be improved e.g. *The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection and recycling service information and performance data across all London boroughs.*

Proposal 4.9

The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

NLWA Comments:

- A commendable proposal which the NLWA has previously suggested. There is strong

evidence that this is the approach that would achieve the highest possible recycling rates for this material. However, diverting this recyclable material from the household waste stream would make the achievement of high municipal waste recycling targets harder, so if a deposit scheme is introduced the Mayor should consider an appropriate associated reduction to his targets.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

– The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

– The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

– The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

Proposal 5.1

The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

NLWA Comments:

NLWA welcomes the use of LWaRB's funds to provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London. However, **NLWA asks that the Mayor places a greater influence on directing London's waste and recycling fund directly to waste authorities**.

As previously stated whilst the Authority welcomes the LWaRB investment in waste processing, it is concerned that public funds are being used to finance investment in private sector facilities handling commercial waste with limited/no benefit returning to the public sector in some cases. Waste facilities have fairly discrete geographic catchment areas so that the element of price competition between LWaRB supported facilities (as well as with non-LWaRB supported plants) is likely to be minimal leaving the public sector with little/no benefit, even in terms of competitive gate fees from the supported facilities. The Authority recognises the LWaRB is now reinvesting existing funds through competitively priced loans and this is a move which is welcomed, but we remain concerned as stated above about the level of value which the public sector is seeing overall

NLWA welcomes the use of the board's brokerage service to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. NLWA is, however, concerned that that a lot of this is predicated on the assumption that the Board will continue to receive funding post-2012, whilst noting that this strategy is set to 2031 and would therefore like to seek reassurance that this strategy is not predicated on continued long-term LWaRB funding.

Proposal 5.2

The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

NLWA Comments:

NLWA commends this proposal, however without funds this will be impossible to deliver. Other key issues, particularly in the London context are land costs, planning environment and the access to a trained workforce, otherwise there are other locations that are more attractive to the private sector.

In addition, NLWA suggests that local reprocessors are also considered when talking about waste infrastructure. Much of the UK's recovered paper and plastic bottles and other materials are transported abroad for reprocessing. Whilst recognising that the return of previously empty 'single-trip' container ships to other countries with recyclables being transported on the return voyage is more valuable in environmental terms that the containers being returned empty, there are economic benefits that can be realised by siting reprocessors locally. Firstly, the cost of transport is removed. There is also a need to understand if the CO_2 emissions from the transport of material overseas is less or higher than the savings achieved from recycling. A study carried out by WRAP concludes that there are CO_2 savings to be made from recycling even if the recovered materials have to be transported to China[11]. Although arguably greater CO_2 savings can be achieved by not exporting any material. Secondly, the building, running and operations of these facilities create local employment if constructed here rather than elsewhere, and finally, presumably there is a cost associated with buying back the recovered material. Again this cost can be removed if the materials are re-processed locally.

Proposal 5.3

The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

NLWA Comments:

NLWA agrees that London should be working towards a vision where it manages most of its waste within its boundaries as long as this does not jeopardise what may be a more environmentally friendly solution in terms of the carbon impact and as long as the definition of waste managed in London is a reasonable definition which includes the definition as suggested by the Authority in its supplementary response to the London Plan as detailed below:

[11] WRAP (2008), CO_2 impacts of transporting the UK's recovered paper and plastic bottles to China

Proposal 5. 4

The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

NLWA Comments:

NLWA commends the Mayor's proposal to promote sustainable forms of transport and is itself investigating the options of water transport from the Edmonton site. NLWA believes that the Mayor will need to go beyond promoting and move to looking at how funds for sustainable transport can be accessed. NLWA has completed a detailed study on water transport from the Edmonton site which TfL and British Waterways identified as a very comprehensive study and TfL requested to publish the report on their website. The findings of the study identified that transport of material (i.e. MSW, SRF, recyclates) is technically feasible from this site, however, there are numerous considerations to take into account for example, the locks, cost and economics, dredging, contract length etc. NLWA encourages the Mayor to consider assisting, where possible in these particular areas. The report will be publicly available by spring 2011.

NLWA is also fortunate to have access to a rail linked transfer facility and through its procurement intends to maximise the use of rail transport.

Proposal 5. 3 Addendum

London Waste Plan – Supplementary Response to Matter 5E from Respondent Number 128, North London Waste Authority following the EiP

1. Summary of Key Points

1.1 The Authority welcomes the inclusion of SRF production within the definition of waste being 'managed' in London. However, as previously stated (in the Authority's supplementary written response to the consultation on the London Plan, the Authority's written statement submitted to the EiP and verbal comment at the same), we are most concerned about the requirement, as currently drafted for the SRF to have a 90% biomass content in order for this approach to apply.

1.2 The NLWA understands and agrees that there is a need to set a standard for SRF, to avoid 'black bag' residual waste simply being shredded and called 'SRF' and therefore contributing towards self-sufficiency targets. However, the Authority believes that a requirement for qualifying SRF to be 90% biomass in energy terms is both unrealistic and will lead to unintended consequences, including increased treatment costs and the disposal of material to landfill which would otherwise be capable of being used as a fuel.

1.3 The technical justification for our argument for suggesting alternative wording within the London Plan is outlined in more detail below, but in summary the Authority's key points are as follows:

- To produce a SRF with a 90% biomass content would require waste authorities to divert compostable and recyclable material such as garden waste and paper away from composting and recycling into SRF in order to achieve a high percentage 'biomass' content. This competition for feedstock could result in a failure to meet the Mayor's aspirations for recycling and composting within the municipal waste management strategy.

- Achieving a 90% biomass content SRF would be excessively expensive, i.e. it would require a considerable amount of energy in the production process and is unlikely to be commercially viable, particularly for high moisture organics, thereby resulting in material being sent to landfill (for which there is minimal capacity in London) rather than being used to produce an expensive fuel which would be unlikely to find an end market due to its cost. Given Mayoral objections to increasing the amount of traditional incineration capacity in the capital, the alternative for this material would indeed be landfill.
- A lower biomass content fuel e.g. 50% biomass content, can still constitute a high quality fuel consistent with the definition of Solid Recovered Fuel as defined within the Renewables Obligation Order (2009) (ROO) and as defined in the European Standard for 'Solid recovered fuels' issued by the European Committee for Standardisation (CEN) - CEN/TS 15359:2006. We attach a copy of the standard which is presently being converted to a British Standard – section 9.3 refers ('biomass' is one of the Annex A, Part 2 properties for solid recovered fuel for which specification is voluntary). The Authority would argue that for the purposes of a document such as the London Plan with a long term life, then a European wide standard for Solid Recovered Fuel such as CEN is a more appropriate reference than the broader Renewables Obligation Order, as the ROO in turn refers to the CEN standards in order to define material which constitutes solid recovered fuel.
- Giving more flexibility within the specification for qualifying SRF within the London Plan also potentially opens up greater opportunities for the material's use in an energy production facility which additionally captures the heat from the process. As outlined above, a 90% biomass SRF is likely to be a prohibitively expensive fuel, but a less expensive, CEN-compliant SRF (with 50% biomass) would be more cost competitive with a wider range of potential outlets for the material, including the potential to capture the heat from the process.
- A related point which we note in the technical justification below is that it makes more sense to transport SRF produced in London, to out-of-London energy producing facilities, if those facilities have a secured heat demand associated with them, rather than confining the use of the SRF to within London, where the most beneficial fuel use (i.e. with heat off-take) may not currently be available, or available within the Authority's current procurement timescales which are both PFI and Defra driven.

2.0 Recommended Change to the London Plan

In the light of the above the Authority therefore recommends a change to the current wording of the third bullet point within section 5.73 of the London Plan to[12]:

For the purposes of meeting self-sufficiency, waste is deemed to be managed in London if:

- *it is used to prepare Solid Recovered Fuels as defined in CEN/TS 15359:2006, which is not disposed to landfill and is used to generate energy.*

3.0 Technical Justification for the North London Waste Authority's position

Current Draft London Plan: "For the purposes of meeting self sufficiency waste is deemed to be managed in London if: … it is solid recovered fuel (SRF) produced in London, provided the SRF is a 'biomass fuel' as defined in the current Renewable Obligation Order. This will encourage the production of a high quality waste derived fuel that can be used to generate renewable energy that can be used to generate renewable energy using a range of technologies including anaerobic digestion and gasification which qualify for double Renewable Obligation Certificates (ROCs)."

3.1 SRF as a Biomass Fuel

3.1.1 Within Section 3 of the Renewables Obligation Order 2009 and the proposed Renewables Obligation Order 2011 (ROO), in order for waste to be classified as a renewable source, the operator of a generating station in which municipal waste is used must satisfy the Gas and Electricity Markets Authority that the proportion of municipal waste which is or derived from fossil fuel is unlikely to exceed 50% and that the municipal waste has not been subject to any process to have materially increased that proportion.

3.1.2 Further the definition of biomass and fuels which are to be treated as biomass within Section 4 of the proposed ROO has not been changed i.e. "fuel used in a generating station where . . . at least 90 per cent of its energy content is derived from relevant material (that is to say material which is or is derived directly or indirectly from, plant matter, animal matter, fungi or algae)".

3.1.3 Here, it is important to note that local authorities have little control over the materials which are disposed of within the municipal waste stream. Whilst the separation of recyclate and organics may be encouraged through specific collection systems and compulsion measures, ultimately, Waste Disposal Authorities are obliged to treat whatever material they are presented with.

3.1.4 Within the Mayor's Draft Municipal Waste Management Strategy (January 2010), a municipal waste composition is provided, based on Defra Waste Statistics (2009). Here, some 34% of municipal waste is attributed to organics, 18% to paper and card, and 5% to wood, giving a total of 61% for organic material. Under the London Plan's proposed definition of SRF, processing systems would be required to isolate this material to produce a fuel with 90% biomass content.

3.1.5 However, after the achievement of the Mayor's recycling and composting targets detailed in Policy 4 of the Mayor's Draft Strategy, which rise to 60% in 2031, the processing of municipal waste to produce a fuel with 90% would prove increasingly difficult and excessively expensive due to the associated processing requirements including:

- the energy required to produce biomass fuel outweighing the benefits of producing a 90% biomass fuel from municipal waste;

[12] Other 'end-of-waste' criteria for SRF may come into place in the future, but for the present this is the Authority's recommended change.

- an ever-diminishing supply of municipal organics to produce 90% biomass fuel making projects economically unviable over the medium to long term.

3.1.6 As a result, the ambitions of the London Plan potentially conflict with the long term ambitions laid out in the Draft Municipal Waste Management Strategy.

3.1.7 Furthermore, the lack of existing outlets (London-based infrastructure) for this form of fuel would see the remaining material being disposed to landfill. In addition, any new facilities would probably be required to meet Waste Incineration Directive requirements due to the origin of the fuel.

3.1.8 The North London Waste Authority (NLWA) intends to procure a waste management solution which will produce a Solid Recovered Fuel with minimum biomass content (by energy) of 50%. Notably, the SRF will have a net calorific value (NCV) of 11-15 MJ/kg (ar) and will constitute a high quality fuel and is intended to be consistent with the definition of Solid Recovered Fuel as defined within the Renewables Obligation Order. This is reflected in the NLWA's Contract SRF specification detailed within its procurement documentation.

3.1.9 This NCV will be achieved by processing some 600ktpa of municipal (predominantly household) waste using a combination of technologies which is likely to include Mechanical Biological Treatment (MBT) and potentially Anaerobic Digestion (AD) with biogas production. The MBT component is designed to glean recyclables from the municipal waste stream to achieve the NLWA's recycling-led solution while the AD will take advantage of the entrained organics. In addition to recovered recyclate, the outputs of the system would be two distinct products:

1) a drier fluff or floc like fraction composed of non-recyclable plastics, soiled paper and other high calorific materials; and

2) low calorific digestate which is unsuitable for broad acre (agricultural or horticultural) application due to its origin.

3.1.10 If the high calorific floc is unable to be used for energy generation (due to policy restrictions or lack of localised outlets), this could potentially see a total of around 340ktpa of material having to be consigned to landfill within London, or outside of London if not capacity is available within London.

3.1.11 Furthermore, because the organics will have been treated through AD, the residual calorific material of the digestate will be very low and whilst being predominantly biomass, would be unlikely have a high enough calorific value to be attractive as fuel in its own right, and would almost certainly require landfill disposal (potentially up to 70ktpa).

3.1.12 For this reason, the Authority is intending to blend the low calorific digestate with the high calorific floc to produce a stable, homogenous, high value fuel (SRF) which is attractive to the energy market, and is readily transportable to end-users. On this basis, the NLWA believes that the SRF intended to be produced will constitute a "renewable energy" source but will not be a "biomass fuel" under the definitions of the Renewables Obligation Order.

3.2 Geographic Management of SRF

3.2.1 The NLWA through its Fuel Use procurement is endeavouring to attract an energy and carbon efficient solution which includes combined heat and power to take advantage of the

total quantity of SRF, expected to in the order of 340ktpa. In addition, this must be done in a manner which presents the most economically advantageous solution to the NLWA while presenting a significant energy opportunity both within and outside of London.

3.2.2 One of the key philosophies of this procurement is that it makes little sense to develop an energy facility (incorporating heat use) and then seek to co-locate energy users with that energy facility. Rather, it makes more sense to transport fuel by the most sustainable means possible, to where a significant heat demand exists. Therefore, by deliberately allowing the market to site a fuel use facility where an energy demand exists, the procurement has been opened to all facets of the market including industrial energy users and decentralised energy / district heating schemes, thereby maximising market competition. Were the fuel use procurement confined to London, the NLWA would not be certain of its ability to attract the most beneficial fuel use solution.

3.2.3 Another significant advantage of this process is that it enables the NLWA to allocate the long term commercial risk to those organisations best placed to manage these risks. As such we have received keen interest from potential bidders located both within the confines of London and indeed within the UK. Indeed, all parties have demonstrated a keen desire to utilise rail and/or water transport, in line with the Authority's requirements.

3.2.4 Therefore, if an economically advantageous energy and carbon efficient solution can be procured either within or outside of the London area, then the NLWA would see this as an extremely beneficial result. On this basis, the NLWA would regard the production of SRF (of a suitable quality) in and of itself as fulfilling the requirement for waste to have been 'managed' in London.

3.3 <u>Waste Deemed to be Managed in London</u>

3.3.1 The Authority proposes the following change to the third bullet point within section 5.73 of the London Plan to:

For the purposes of meeting self sufficiency, waste is deemed to be managed in London if:

- it is used to prepare Solid Recovered Fuels as defined in CEN/TS 15359:2006 which is not disposed to landfill and is used to generate energy.

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:

Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

NLWA has no comments.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

NLWA has no comments.

21. Any further comments on this policy?

NLWA has no comments.

About your organisation

22. **Name**

North London Waste Authority

23. **Organisation**

North London Waste Authority

24. **Address**

Lee Valley Technopark
Ashley Road
Tottenham
London
N17 9LN

25. **Type of organisation**

London Waste Disposal Authority

26. **Approximately how many people does your organisation employ?**

X 0-50

Thanks for taking part!

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

Whilst the East London Waste Authority supports policies that reduce and reuse waste the targets within this strategy can not be achieved. The Mayor has set targets for recycling and composting in line with the National Waste Strategy 2007 up to 2020 and has set a higher target than the NWS for 2031. The achievement of national targets is based on regions contributing differently depending upon local circumstances and in London's case this should anticipate a lower than average contribution reflecting the lower levels of green waste available. In order to achieve this vision this Authority would urge the Mayor to revise his targets within this strategy in order to prevent the Mayor and London failing to achieve this strategy.

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The objectives within the strategy are commendable. However the targets do not seem to recognise the ability of existing infrastructure and long term contracts that are already in place and therefore the difficulty and excessive cost that would be involved in meeting the specified targets. This Authority recognises the Mayor has to address energy generation but we do not feel that the target of "to generate as much energy as possible from London's organic and non-recyclable waste" is a measurable target and we question whether this is a target that should be in the waste strategy but would be better suited in the energy strategy as there is much reliance on heat offtake in the form of district heating.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision

Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy

The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. **What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?**

The Mayor has not provided sufficient evidence to show that either of these targets can be achieved. This Authority believes that the Mayor should use his influence to lobby government for increased producer responsibility programmes to reduce waste presented to Local Authorities and the cost involved in managing this waste. ELWA does not believe that the resources provided to Recycle for London are sufficient enough to deliver the targets in this strategy. This Authority would like to see the Mayor use his influential powers to work with Government and address the issues of a "throw away society" and work with retailers to provide quality products that are designed to last or that can be easily repaired.

4. **What do you see as the key considerations for developing a successful London-wide reuse network?**

It is not clear from the strategy whether the targets for re use are for the provision of capacity to reuse or the tonnage of material sent for re use, this should be made clear. The targets seem overly ambitious with no supporting evidence that this can be achieved or that there is a robust system for measuring this objective.
This Authority would welcome the Mayor supporting a London wide campaign to raise awareness of re use opportunities. By far the simplest part of the reuse process is to persuade the public to donate it's unwanted goods but markets must be created to ensure that there is a demand for these products to close the loop. Local Authorities could play a key role in ensuring that white goods and other reusable furniture is the primary source for social housing. The Mayor should work with Government to create an incentive for consumers to choose reuse items over new such as a lower rate of VAT.

5. **Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?**

Small businesses need to be made aware of their obligations under existing regulations such as the duty of care regulations and should be reminded that there is a cost to waste disposal that is not covered by the business rates. A regional campaign to inform small businesses of requirements, opportunities and where they can go to for support for waste reduction would be useful.

6. **Any further comments on this policy?**

This Authority supports the policy of London wide communications campaigns and initiatives but the cost of which should not be underestimated.
The Mayor may be creating perverse and unintended consequences which prevent the real aim of mitigating climate change impacts of municipal waste management by setting conflicting targets. For example by setting high municipal waste recycling targets this may have a negative effect on the reduction of municipal waste generated which has a greater impact on climate change mitigation.
In order to incentivise efforts for re use the Mayor should devise a system for measuring the quantity of material sent for re use and allow for this in the Energy Performance Standard.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. **What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?**

The Authority welcomes a move to CO2 equivalent approach to managing waste in principal but do not agree that this should be in addition to tonnage based targets. It is not clear as to the difference between a target and a standard and whether this is a London wide standard or whether it will become a standard that each local authority must comply with. With a significant emphasis on re use within this strategy there should be a methodology to include re use within this calculation.
The EPS is perhaps the most complex area of the strategy and a simple guidance document would be welcomed. This Authority supports the introduction of a simple to use 'ready reckoner' but is concerned that the existing limitations in WRATE will be magnified by the oversimplification of such a tool and the removal of flexibility in entering complex scenarios. The effect of which will be increased costs to local authorities in the use of consultants to generate required reports by reverting back to WRATE.

8. **Any further comments on this policy?**

It is understood that London boroughs are not currently meeting the EPS and therefore changes will have to be made. Some Authorities such as ELWA and WRWA are relatively early on in the cycle of long term contracts and therefore it would be unreasonable to expect any significant changes in the near future without necessitating excessive cost in collection service or contract modifications. It is difficult to see therefore how the existing EPS has been set to "…achieve the greatest climate change mitigation benefits from London's municipal waste at least cost".
It is not clearly understood what is meant by 'work with' and how much of the Mayor's resource will be used up in activities that others such as the EA could be tasked with carrying out. It would also appear that the GLA are working in isolation on the EPS and ask whether this work is a duplication of DECC work or whether it would be better to allow DECC to carry this work out and free up more of the Mayor's resource to concentrate on other areas for the benefit of London.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

This Authority supports this policy in principle as long as local decisions can be made whether to adopt the model contracts rather than be forced to use them.
There is concern that the Mayor is duplicating work that is already underway by organisations such as WRAP and Improvement Efficiency South East.
Local politics and public support for service provision changes in their locality is a particular barrier to joint procurement activities. Lengthy transitional arrangements may be required to overcome existing contractual obligations and whilst there is always the potential for a change in political governance the question remains whether a long term procurement strategy across different councils can be achieved in the absence of a joint waste strategy.
The localism agenda promotes a culture of policies driven from the local demands and therefore cold work against any joint working arrangements.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

Except for the area of planning it is not clear what support the Mayor could provide, LWARB's funds are not sufficient to deliver the Mayor's strategy.

11. Any further comments on this policy?

This policy refers to unlocking the economic value of London's municipal waste but does not take into account the volatility and risk of these markets. Whilst the cost of recycling is borne by the Authorities not all of the economic benefits will pass back to them.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. **What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?**

Inevitably different waste authorities will provide a locally tailored service to it's residents for the provision of it's waste management services and this can cause confusion and apathy to the residents particularly in relation to recycling. Whilst a difficult task a certain degree of commonality across the region would be beneficial such as colour coding of recycling bins.
Londoners and other residents of the UK are constantly subjected to the scaremongering reports in the media which constantly undermine the efforts of local authorities to improve services. Regional communications programmes and a consistent message coming from the GLA may go some way to combat this.
League tables for recycling are unhelpful and are another justification for not having these targets in the Mayor's strategy, these league tables are a barrier to introducing affordable best practice in the local area, local authorities would be better judged by residents satisfaction with services.

13. **What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?**

The Mayor has set targets for recycling and composting in line with the National Waste Strategy 2007 up to 2020 and has set a higher target than the NWS for 2031. The achievement of national targets is based on regions contributing differently depending upon local circumstances and in London's case this should anticipate a lower than average contribution reflecting the lower levels of green waste available. In order to achieve this vision this Authority would urge the Mayor to revise his targets within this strategy in order to prevent the Mayor and London failing to achieve this strategy.
This Authority would like to see all recycling targets removed from the strategy. Targets are unhelpful in delivering services that local people want and the chasing of targets can lead to authorities introducing expensive services that local people are against which is against the principle of localism and further underpins apathy and prevents participation and improvements.

14. **What specific role do you think the Mayor has to play in improving recycling across London?**

Recycling is only one means of mitigating climate change impacts and does not necessarily deliver the greatest environmental benefits and we would prefer the Mayor to use his influences on reducing waste production. Forcing Authorities to chase higher recycling rates may not deliver any environmental benefits at all and may increase the amount of waste generated. The Mayor should concentrate on the whole lifecycle of waste and promote the overall aim of climate change mitigation and not disproportionately promote recycling when the aim is to prevent waste and stop waste going to landfill.

15. **Any further comments on this policy?**

Regional targets should be used to reinforce national targets allowing for local circumstances, therefore this Authority would recommend that if the Mayor is minded to set targets then he should ensure that he sets realistic targets and does not set London up to fail.

The Mayor should be minded to avoid introducing reward schemes that encourage perverse behaviour such as being rewarded for generating more waste (albeit classed as recycling or recovery materials) and thus stimulating poor consumer decisions.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

– The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

This Authority recognises the external pressures the Mayor is under to deliver this objective however this should not be so restrictive as to prevent other opportunities from being examined.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

This will not be achieved in London without considerable reliance on EfW facilities. As London does not have the manufacturing industry to make use of the available waste for fuel then energy production is the most likely solution however demand for heat offtake from these facilities provides its own problems if the facilities even make it through planning and construction.

18. Any further comments on this policy?

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:
Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

Waste generated from events like the Olympics, festivals and concerts is commercial waste and tighter controls should be placed on organisers and producers of waste such as food and drink outlets to clear up their own waste and ensure that suitable facilities are provided for the recycling and disposal of waste generated at these events. This may be in collaboration with the local authority but the burden should not be on the local tax payers to pay for the cleanup operation.
Whilst the public remains apathetic towards littering the streets without significant recourse the problems of littering will remain. Local authorities have scarce resource available to monitor and enforce prevention of littering.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

The Mayor could consider what role he could play in waste prevention by working with waste producers such as fast food outlets, distributors of free newpapers and magazines, to prevent the waste ending up on the streets in the first place. The Mayor should consider how he can provide support for enforcement of actions and prosecutions for instances that have led to littering.

21. **Any further comments on this policy?**

The Mayor's policy of undertaking a major clear up after the Olympics games is laudable however the mayor should provide the WDAs with the financial resource to dispose of this material after it has been collected.

About your organisation

22. **Name**

Mark Ash

23. **Organisation**

East London Waste Authority
ELWA is a statutory joint waste disposal authority that provides the waste disposal function for the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge.

24. **Address**

Arden House
198 Longbridge Road
Barking, Essex IG11 8SY

25. **Type of organisation**

- ☐ London Borough
- ☐ Central Government
- ☐ Third sector
- ☐ Private waste sector
- ☒ Other

Please specify

Statutory_Joint_Waste_Disposal_Authority

26. **Approximately how many people does your organisation employ?**

- ☒ 0-50
- ☐ 51-250
- ☐ 251+

Thanks for taking part!

Response by Western Riverside Waste Authority

The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

The Authority believes that greater focus needs to be given to the top of the waste hierarchy and recognition that waste is not a "resource" - it is an unwanted by-product of an often wasteful society. Waste prevention, reduction and reuse are areas that require greater focus within the Strategy. Recycling, whilst important, is not a cure-all, there needs to be greater recognition that energy recovery (after allowing for collection and transportation factors) can be a more environmentally friendly solution. The Mayor needs to be more realistic about the deliverability of his preferred but unproven (and currently unbankable) "advanced" thermal technologies as over-reliance on these could result in a prolonged use of landfill.

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The Authority would agree with the first two bullet points.

The third objective is misleading; there is no "massive economic value" – if there were, why would the first priority be to reduce the amount generated? The objective here should be to move waste out of landfill and to minimise its environmental damage.

The fourth objective misses the point that waste should be treated using the best practicable environmental option – regardless of its geographical location.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision
Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy
The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets

- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09 levels, by 2020 and increasing to 20 per cent per household by 2031.

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:
  a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
  b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

A 10% reduction in 2008/09 household waste arisings by 2020 and a 20% reduction by 2031 might be achievable but the Strategy provides no guidance as to how this targets will be met in practice.

The target will also have benefited from the efforts made by retailers to move to 'lightweight' packaging, in line with the Courtauld agreement, and the general effects of the economic downturn. It remains to be seen whether or not waste awareness campaigns have managed to break the historic link between economic activity and waste generation.

The Authority has worked closely with the London Community Resource Network (LCRN) to secure funding from the London Waste and Recycling Board (LWaRB) to set up a reuse scheme in its area. The increases in reuse tonnage anticipated by the Mayor seem unrealistically ambitious when compared to those projected by LCRN in its work with the Authority.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

The "Third Sector" is key as it has the social and retail outlets that are necessary to redistribute the material that is collected. The sector has already proven that it has the expertise to set up successful reuse schemes but it needs financial assistance to make the step change desired by the Mayor. The Authority supports LWaRB's funding of a London-wide reuse network.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

No.

6. Any further comments on this policy?

The Authority sees this policy area as being the one where the Mayor can use his prominent public profile to best advantage. The Authority believes he can influence people and companies to do the right thing and change their behaviour without the need, or requirement, of a statutory power.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision

The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced.

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

The Authority agrees that weight-based recycling targets are not an effective measure of environmental performance as they can distract from waste reduction and reuse priorities and ignore the fact that energy recovery can be a better environmental option for some waste streams when compared with recycling.

The Authority also agrees that an alternative, CO_2 equivalent (eq) based system should be explored but it does not believe that the Mayor's current proposals are sufficiently well developed and have not been subjected to an adequate level of academic scrutiny for them to be included in the Strategy as "standards" for waste authorities to achieve. See also comments under 8 below.

8. **Any further comments on this policy?**

The Authority would propose that following a period of extensive development, consultation and review, a CO_2eq based system could be introduced as an advisory measure for local authorities with a view to it being introduced as a "standard" on the expiry of the current European weight based targets in 2020.

This approach would also allow proper account to be taken of the Government's ongoing review of Waste Policy, its consultations on Energy Policy, transposition of the Waste Framework Directive and the impact of 'localism' on the planning system.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. **What do you think are the key issues in establishing joint procurement contracts for waste authorities?**

London's four Statutory Joint Waste Disposal Authorities and the South London Waste Partnership mean that 75% of London is already divided up into groupings capable of bringing about effective economies of scale. A number of Southeast London Boroughs' have also formed a Joint Waste Working Group that has already agreed a collaborative approach to meeting the Mayor's waste apportionment targets.

The Authority does not believe that Policy 3 is properly within the Mayor's waste remit and it sees no benefit from the Mayor involving himself in this area.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

Easier access to grant funding, particularly from LWaRB. The Authority believes that to date LWaRB has provided little assistance to London's waste authorities despite these authorities being the principal deliverers of the Mayor's Municipal Waste Strategy. LWaRB's business case needs urgent review.

11. Any further comments on this policy?

None.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

The Authority believes that recycling and composting already constitute a straightforward part of most Londoner's lives. The Authority's boroughs are already among the best recyclers of dry recyclate nationally. Composting recycling skews performance between authorities as this material is not as readily available in urban areas. Also Life Cycle Analysis has shown that this Authority's Energy Recovery system is on a par, or is better environmentally when compared to recycling many organic waste streams including food and garden waste.

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

A 20 point increase in municipal recycling performance from 25% to 45% in 4 years is unrealistic

Each recycling percentage point costs more to achieve than the previous one and these targets take no account of the financial challenges facing local authorities. Serious consideration needs to be taken of whether such expenditure could be used more productively on other environmental projects such as heat insulation and indeed whether or not other social needs should take preference.

14. What specific role do you think the Mayor has to play in improving recycling across London?

The Mayor can assist with regional advertising campaigns but the Authority would prefer the Mayor to concentrate his efforts towards the top of the waste hierarchy as this is where the Authority believes the Mayor can be most effective. Please see answer to Question 6 above.

15. Any further comments on this policy?

Given London's unique challenges it makes no sense for London to have higher targets than the rest of the UK and the EU as a whole. Higher targets will result in higher costs that London's waste authorities can ill afford given the current economic climate.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will

be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

- The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

No. If waste is to be regarded as a resource then it should be managed in the most advantageous location (as are other resources) and that should not be restricted by political boundaries. This applies equally to the import and export of waste from London.

The Mayor's proposed 60% recycling target coupled with the fact that the majority of recycled waste packaging will subsequently be exported to China and elsewhere in the Far East also exposes a double standard within this policy.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

Nationally, waste management treatment contracts (and the associated infrastructure) are among the most complex under local authority control. The risks involved in changing from landfill – which is a reliable, non-technological based solution – are very large and these risks ultimately manifest themselves as costs. These risks, some of which are listed below, also need to be factored into contract lengths of up to three decades, so as to make the capital investment affordable:-

(a) Security of feedstock – guaranteed minimum tonnage.
(b) Technology risk.
(c) Security of markets for technology outputs (electricity, heat, commodities, solid and liquid residues).
(d) Planning.
(e) Judicial Review.
(f) Funding.
(g) Litigation (pre and post tender).

London is not particularly unique in this respect but it has added complications such as higher land values, a relative shortage of available land and waste collection challenges caused by the London's unique built environment, particularly in central London.

The Mayor should focus his attention on issues he can realistically influence at a regional level, notably the planning system, and offer, through LWaRB, more support for local authority collection systems.

18. Any further comments on this policy?

LWaRB's Business Case needs review so at to make its funding more accessible to London's waste authorities which are the principal deliverers of the Mayor's Municipal Waste Management Strategy. Previous funding models were significantly more successful in this regard.

Policy 6: Achieving a high level of street cleanliness

Vision

Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy

The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:

Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London.

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme.

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

No comment. This is a question best answered by waste collection authorities.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

No comment. See Question 19.

21. Any further comments on this policy?

No.

About your organisation

22. Name Mark Broxup – General Manager

23. Organisation WESTERN RIVERSIDE WASTE AUTHORITY

24. Address Smugglers Way, Wandsworth, LONDON SW18 1JS.

25. Type of organisation

- ☐ London Borough
- ☐ Central Government
- ☐ Third sector
- ☐ Private waste sector
- ☒ Other

Please specify

Statutory Joint Waste Disposal Authority

26. Approximately how many people does your organisation employ?

- ☒ 0-50
- ☐ 51-250
- ☐ 251+

Thanks for taking part!

SOUTH LONDON WASTE PARTNERSHIP

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Andrew Richmond
Draft Waste Strategy Consultation
Freepost LON15799
Post Point 19B
City Hall
The Queen's Walk
London SE1 2AA

Date: 14th January 2011

Dear Mr Richmond,

Consultation Response – The Mayor's Municipal Waste Management Strategy Public Consultation Draft

Thank you for providing an opportunity to comment on the Mayor's Municipal Waste Management Strategy. I am pleased to provide the South London Waste Partnership's (the Partnership) response to the consultation questions in the attached Feedback Form.

The Partnership is made up of four councils (Croydon, Kingston, Merton and Sutton) who are working together to provide improved, more cost-effective and sustainable waste management services to their residents.

I am pleased to present our consultation response below.

Policy One: Preventing Waste and Informing People of its Value

Waste Reduction

The South London Waste Partnership supports the prioritisation of waste management solutions according to the waste hierarchy. Therefore, we are pleased that the first policy within the Mayor's MWMS is about preventing waste. However, we do not feel that the Mayor has gone far enough to express that waste reduction is the most beneficial policy for reducing the both the economic and environmental costs of waste management in London.

'Zero waste' is a term that has been used in the past by extreme environmentalists to promote the idea of a society where absolutely no waste is created in the first place. This is waste minimisation in the extreme, and whilst attractive, is unrealistic in the world in which we operate. The Partnership understand that the term 'zero waste' is being used to describe a different scenario here, but the potential for confusion and misunderstanding remains.

In addition, there are some forms of waste for which landfill remains the only credible option. To manage expectations, the Mayor should resist the temptation

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of using the term 'zero waste' until it is something that can realistically be achieved.

Whilst setting a waste reduction target is admirable and demonstrates the commitment of the Mayor to reducing waste within the capital we believe achieving such a target is largely outside local authority control. There are so many influences on waste reduction that are beyond the remit of local authorities, including:

- The state of the national economy;
- Societal trends i.e. fast fashion;
- Amount of packaging;
- Product design;
- Negative publicity surrounding waste minimisation initiatives; and,
- Stimulating a market for reusable items.

We are concerned about how realistic the waste reduction target is when the target baseline was taken during a recession and that there has not been any evidence to suggest that the link between waste arisings and wealth has been broken. Therefore, we recommend that the Mayor reviews this target.

The strategy includes references to waste minimisation, waste prevention and waste reduction. We are unclear of the Mayors interpretation of these terms and would like further clarification. If we are unclear about the meaning of these terms then it is unlikely that our residents and business proprietors with understand them. The Mayor needs to consider whether all three terms should be included within his MWMS.

We are supportive of the Mayor's proposals to promote waste reduction and reuse through Recycle for London. We appreciate the amount of consultation that Recycle for London have conducted with the London boroughs and believe that it is important that they continue to do this so that local campaigns complement and build on regional waste reduction campaigns.

It is vital that businesses play their role in reducing waste and we are pleased that the Mayor has proposed to work with businesses in the capital to improve resource efficiency. We would also support the Mayor with any lobbying of national government and businesses for taxation of unsustainable products, increased product lifespan, longer guarantees, standardisation of components, behaviour change, and reducing packaging. Local authorities absorb the full costs of collecting and disposing of unwanted products that could have been produced in a more sustainable manner. It is not morally right that tax payers have to pay for waste that is caused by private companies. It also does not fit with the polluter pays principal.

<u>Reuse</u>

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The main barrier to the development of a successful reuse network within London is funding. We therefore welcome LWARB's investment in the delivery of reuse infrastructure through LCRN. Some of this investment should be used to support third sector organisations in becoming self funded to ensure that the network is sustainable over the duration of the Mayor's MWMS.

Key considerations for the development of a London-wide reuse network include:

- Identifying an accurate measurement of the amount of reuse;
- Increasing the amount of infrastructure for reuse despite the high demand and price of land in London;
- Gaining good quality items;
- Providing training for reuse and repair industry;
- Stimulating a market for reusable items;
- Challenging the consumers perception about "second hand" items;
- Lobbying government and large companies to ensure that products are designed for reuse and repair;
- Financial implications of the reuse network to local authorities during a time when they are facing reductions in their budgets; and,
- Providing a one-stop shop for all of London's reuse activities.

Policy Two: Reducing the Climate Change Impact of the Management of London's Municipal Waste

Reducing Greenhouse Gases

The Partnership agrees that we need to focus on delivering greenhouse gas savings through sustainable waste management activities and will work with the Mayor to do this. Although, it is important to remember that a climate based approach relies on accurate tonnage data.

Emissions Performance Standard (EPS)

Whilst we support the rational behind setting a CO_2 EPS, we recommend that the Mayor uses it to guide local authorities on how they can reduce the carbon footprint of their waste management services rather than as a requirement. The Mayor needs to acknowledge that before making service decisions, local authorities have to consider other factors such as value for money and practicality of implementation. Local authorities in consultation with their stakeholders are best placed to make decisions where there is a trade-off between the financial cost and greenhouse gas saving.

We already spend a large amount of time collecting, collating, monitoring and reviewing waste data as required by central government. During a time when local authority resources are being reduced it does not make any sense to introduce another administrative burden. The potential administrative burden of the greenhouse gas performance toolkit should be considered.

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We feel that by prioritising according to the waste hierarchy the Mayor will already be encouraging local authorities to reduce the carbon footprint of their waste service. Therefore, we do not believe it is necessary to set the EPS.

A technical understanding is required to understand the modelling behind the EPS. Most residents now have an understanding of recycling and recycling rates. It will be a challenge to help them to understand the EPS and we would require assistance from the GLA.

It is currently a work in progress and the Mayor has not stated any intent to consult further on the EPS when it is complete. We think that it is important that if the Mayor decides to introduce this standard that further consultation takes place between the GLA and London boroughs.

With your current schedule, it is unlikely that greenhouse gas performance standard will be confirmed until May 2011. By the time the standard is confirmed the Partnership will have reached the Final Tender stage of its residual waste treatment procurement. We may not have the flexibility to change our contract to meet your minimum standard. If the Mayor decides to set an EPS we would like to be involved in the development of the standard at as an early a stage as possible.

Removing the requirement to meet the EPS will not prevent us from seeking to reduce the carbon emissions of our service.

Carbon Floor

Again, we recommend that the Mayor uses the carbon floor to guide local authorities and waste management companies on how they can reduce the carbon footprint of energy recovery facilities in London instead of making it a requirement of the MWMS.

We have some concerns about the indicative requirements including the high level of efficiency that has been proposed for incineration with electricity generation. Even the most modern incinerators in the capital do not expect to reach an efficiency of 28%. There is also a trade off between the efficiency of the facility and the cost. Any cost to the contractor of an energy recovery facility will be passed to the local authority through the gate fee. Financial support from the Mayor to increase the efficiency of energy recovery technologies used by London boroughs and to set up decentralised heat networks would be a greater incentive to increase efficiency than the carbon floor.

The amount of biowaste required within the feedstock of energy recovery facilities to enable the carbon floor to be achieved would disincentive local authorities from collecting materials like food waste for anaerobic digestion. This is inconsistent with the Mayors proposed high recycling rates and encouragement for more anaerobic digestion.

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Policy Three: Capturing the Economic Benefits of Municipal Waste Management

We are concerned that this policy implies that the economic benefits of waste exceed the costs of waste management. Whilst we agree that it is important that economic benefits are maximised through the sales of recyclables and electricity we do not believe that managing waste will become cost neutral during the life of the Mayor's MWMS.

Establishing Joint Procurement Contracts

A number of the South London Waste Partnership boroughs are already investigating further joint procurement opportunities in response to budget reductions. There are a number of factors that will affect the outcome of these investigations e.g. existing contract lifespan. We cannot see any benefits of further investigation by the Mayor.

We have several concerns around the proposal to establish a joint procurement contract framework for London boroughs including:

- The potential restriction to individual borough's flexibility in opting for a contract that suits their local circumstances;
- Ability of local authorities to get out of long term contracts;
- The diversity of London's boroughs, particularly between the inner and outer boroughs;
- Timescales of existing contracts;
- Giving a contractor a monopoly over waste management in London; and,
- Inconsistency with national policy on localism.

The key considerations in establishing joint procurement contracts for waste authorities include:

- Economies of scale;
- Attractiveness to the market;
- Political cooperation;
- Shared objectives of partners;
- The management of risk;
- Budget commitment;
- Strong governance; and,
- Officer expertise.

We recommend that the Mayor consults with London boroughs specifically about the need for waste procurement contract frameworks.

Model Municipal Waste Contracts

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London boroughs are already good at sharing information about how to develop contracts through local authority networks. We support the development of model contracts for specific services e.g. bulky waste. Having a model contract could save time and therefore costs during procurement. However, it is vital that we are given the flexibility to choose whether a model contract would be of use during a specific procurement.

Local Authority Owned Facilities

We think that there may be some value for local authorities to build and operate small scale infrastructure e.g. biodiesel production facility. But the waste industry is better placed to develop large scale infrastructure like energy recovery facilities. Barriers for local authority ownership include the ability to attract funders and the risks involved.

Financial support would be essential to develop local authority ownership.

Policy Four: Achieving High Municipal Recycling and Composting Rates

Recycling Targets

In principal the Partnership welcomes your proposal to achieve high rates of municipal waste recycling and composting. We have already committed to achieving household waste recycling rates of 45% by 2015 and 50% by 2020 in our Joint Waste Management Strategy. We recognise that the Mayor's recycling targets must be quantitative and something we can aspire to but we are concerned that the proposed recycling targets are too high.

There is a conflict between the Mayor's waste reduction targets and the municipal recycling targets that does not appear to have been acknowledged in the MWMS. Waste reduction achievements may reduce the amount of recyclable material available and the opportunity to meet recycling targets. For example, the amount of paper available for recycling in London has reduced with the decline of free newspapers. Therefore, we recommend that the Mayor reviews the recycling targets.

Whilst the introduction of schemes to collect garden waste is known to increase the recycling and composting rate of a borough it is also likely to discourage home composting and therefore increase waste production. This is contradicts the Mayors waste prevention agenda. Sending garden waste to energy from waste produces a better carbon footprint than sending it to a centralised compost facility. Therefore, setting high recycling rate can not only contradict the Mayors waste prevention agenda but also his ability to reduce the climate change impact of waste management.

Other barriers to meeting high recycling targets include:

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- Reductions in local authority budgets and consequently our ability to increase the range of recyclable materials that we collect;
- The large proportion of flats, which generally have lower recycling rates than low rise properties;
- Fewer gardens and therefore lower quantity of garden waste available for recycling in London in comparison to other counties; and,
- High diversity and transiency of London's population.

In contrast to the European Union and national government, the Mayor has set municipal recycling targets rather than household recycling targets. Having a municipal recycling target supports activities that we have taken to increase the diversion of non-household waste streams like waste from street litter bins, street sweepings, and trade waste from landfill. However, recycling and composting of these waste streams is less developed than recycling and composting of household collected waste. We think that it will require a lot of investment and research to recycle non-household waste and are therefore concerned that the lead in time to the first target is not long enough. It does equate to an increase of approximately 17% in recycling from 2009/10 levels by 2015.

Other Recycling Services

We agree that separate food waste collection services, flats recycling, "on the go" recycling and business recycling can contribute to increased recycling rates. The main barrier to the development of these services is the cost and resources involved. We therefore support the recent investment into flats infrastructure and local communication campaigns. We would like to be consulted on the proposals for this investment. This investment should be expanded to other recycling collection infrastructure e.g. containers, vehicles to support London boroughs that need to expand their recycling collections to achieve higher recycling rates and increase diversion from landfill.

The Mayor also needs to acknowledge that the services listed above are not suitable or value for money in all areas of London, particularly where space is limited.

Incentive Schemes

Having considered implementing a recycling incentive scheme we have some concerns about the financial viability and practicalities of these schemes, including:

- Installing weighing technology;
- The reliability and accuracy of the technologies used;
- Rewarding people for recycling working against driving waste prevention;

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- Reducing our ability to encourage individuals to take responsibility for their own waste;
- The types of reward offered;
- Negative publicity associated with chipping bins;
- Misuse of bins as a result of residents trying to dispose of their waste in other residents bins;
- Increase in illegal dumping of waste;
- Uncertainty about whether increases are realised in areas that already perform well; and,
- The limited choice of incentive schemes.

Mayor's Role

We believe the Mayor's role in improving recycling across London should include:

- Providing financial support for recycling communications and collection infrastructure e.g. LWARB's flats recycling fund, Recycle for London;
- Supporting the development of reprocessing facilities and pre-treatment facilities;
- Raising awareness of business responsibilities and promoting good practise with authorities that have put arrangements in place with local businesses;
- Encouraging developers to provide adequate waste and recycling storage;
- Making sure that residents feel appreciated for their efforts through communication; and,
- Lobbying central government to create a variable VAT system that encourages recycled, reused and repaired goods.

Policy Five: Catalysing Municipal Waste Management Infrastructure in London

Investment in new infrastructure

Ultimately our ability to reduce our reliance on landfill is down to investment in waste infrastructure. Therefore, we welcome the proposal to invest in new waste infrastructure.

Investment in low carbon technologies

We support investment in low carbon technologies for London's municipal waste. It is important that the Mayor remains technology neutral. We believe that London boroughs and the waste industry are best placed to make decisions about the infrastructure required to meet local needs.

The Mayor's new 6 step waste hierarchy concerns us in terms of the distinction it makes between recovery technologies that harness heat and those that do not. We do not think there is any more need to separate recovery technologies within the waste hierarchy than to separate closed loop recycling from open loop

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recycling. It is also a deviation from the revised Waste Framework Directive. In reality, where financially viable the waste industry will be keen to harness waste heat as it will provide them with an additional income. Therefore, we do not feel there is a real need for the additional layer within the waste hierarchy. Instead, the Mayor should encourage Combined Heat and Power-enabled plants by publicising his plans for decentralised energy investment plans.

The barriers to procuring a residual waste technology, which is able to deliver Combined Heat and Power (CHP) include cost, proximity of potential waste heat users to available land, retrofitting buildings for CHP use, and, infrastructure requirements. We think that the Mayor could help us to capture the benefits of CHP by lobbying Central Government for financial backing and planning support.

The Mayor will also need to consider value for money in terms of the reduction in carbon dioxide equivalent before retrofitting London's existing energy from waste facilities.

Self Sufficiency

The Partnership is concerned that the Mayor has taken a narrow approach to the self sufficiency principal. There are many barriers to the delivery of a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries including:

- Public opposition to waste facilities due to lack of understanding; i.e. NIMBYism;
- The value of land in London is higher than in other areas of the country;
- Competing pressures on land in London,
- Planning constraints;
- Existing land users;
- Political opposition and political positioning;
- Withdrawal of PFI credits;
- Transporting waste from south London to north London can be less sustainable and more costly than transporting waste to another county; and,
- Lack of joint working between local authorities.

We recommend that the Mayor introduces a more flexible approach, which would not restrict London boroughs from exporting waste outside the capital when it is environmentally and economically beneficial to do so. We would also suggest that LWARB funding should also be used to fund waste infrastructure within other counties if facilities can demonstrate that a significant amount of their capacity will be used by London boroughs.

Sustainable Transport

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We welcome the Mayor's proposals for the promotion of sustainable transport for the movement of waste. Increasing the sustainability of waste transport has been a priority for London boroughs for a number of years. Therefore, we would be interested to have more information on how this will be achieved.

Policy Six: Achieving a High Level of Street Cleanliness

The Partnership supports the Mayor's ambition to achieve high levels of street cleanliness. The role set within the MWMS for the Mayor with regards to street cleanliness is appropriate. We particularly welcome the Mayor's proposal to lead on London-wide behavioural change campaigns and to work with manufacturers to reduce litter. Other actions the Mayor should take include:

- Raising awareness of the economic cost and environmental damage that is caused by flytipping and litter;
- Working with train companies to reduce littering in the areas surrounding train stations in London;
- Showcasing local authorities that make a positive impact on the level of cleanliness of London's streets; and,
- Influencing private investment in litter and "on the go" recycling bins through sponsorship opportunities.

The high levels of street cleanliness the Mayor should be considering:

- The diversity of London's borough's;
- How to engage with tourists;
- The role of the big society; and,
- Local authority budget reductions, which may lead to a decrease in the frequency of street cleansing.

General

There are a number of inconsistencies within the Mayor's policies that need to be addressed before the MWMS is finalised. For example, the conflict between ambitious waste reduction targets and equally challenging recycling targets.

Since the draft MWMS was published central government has announced the withdrawal of PFI credits to the North London Waste Authority and the South London Waste Partnership, the end of National Indicators and the 2009/10 municipal waste statistics. The MWMS should be updated to reflect these changes.

It would be useful to see the financial impact assessment for each policy.

We hope that consultation response is useful.

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If you have any queries on this response or if we can be of further assistance then please do not hesitate to contact the Partnerships Project Manager, Faye Myers on 07770 633990.

Yours Sincerely

Cormac Stokes
Chair of the South London Waste Partnership
Head of Street Scene Management (London Borough of Merton)

West London Waste Authority

Councillor Bassam Mahfouz
Chair of the Authority

Mogden Works, Mogden Lane
Isleworth, Middlesex TW7 7LP

Telephone 020 8587 1770
Fax 020 8560 5684

Date: 10th December 2010

Dear Mayor,

WLWA Response to consultation on Mayor's draft Municipal Waste Management Strategy

Thank you for inviting comments on these important proposals, I am pleased to provide the views of the West London Waste Authority (WLWA).

The WLWA is a statutory joint waste Authority that provides the waste disposal function to the London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond. The Authority's response has been developed in discussion with London Councils and the constituent boroughs.

Whilst the Authority is generally supportive of the Mayor's proposals, and would wish to work with the Mayor to develop and deliver his vision, targets and objectives it does have some very real concerns in a number of areas as highlighted in the detailed response attached. The Authority would remind the Mayor of the requirement for his London strategy to be in conformity with the National Waste Strategy which is currently being reviewed by Defra, and the results of which are unlikely to be known until after the conclusion of the Mayor's public consultation. In the draft strategy, the Mayor has also anticipated the provision of PFI credits to the North London and South London Waste Authority/Partnership which were withdrawn as part of the spending review in October. It is thought that the Mayor may need to revise some of his proposals in light of this, in addition the Mayor appears to have relied on LWARB funding for a number of his projects and whilst has already had an in-year reduction, future funding would seem at this time very uncertain.

The Authority has particular concerns over the proposals in Policy 2. Whilst there is merit in changing the way in which performance of waste facilities and services are measured, it is not appropriate for London authorities to have to achieve these new standards whilst still having to have regard to national targets. The Authority are concerned that the proposals in Policy 2 will significantly increase the cost of future

waste services and as West London will probably be the first area to procure under the Mayor's new strategy, the residents in our area will bear these additional costs up to 25 years before other parts of London.

The Authority has detailed concerns in other polices as highlighted in the attached detail response.

If you require any further information or clarification on the contents of this letter, please contact the Director, Jim Brennan at the address above, or at jimbrennan@westlondonwaste.gov.uk.

Yours faithfully,



Councillor Bassam Mahfouz
Chair of the Authority

1. The Authority has set out its response to the draft Municipal Waste Management against the six proposed policies and the relevant targets for each.

Policy 1: Informing producers and consumers of the value of reducing, reusing and recycling municipal waste

2. The Authority supports this policy on reducing and reusing waste however the Mayor should strengthen his proposals for helping achieve levels of reduced municipal waste.

3. Whilst recycling has its merits there is a real need – in meeting self sufficiency and achieving cost savings – to reduce waste. Generally, recycling has obvious environmental benefits compared with traditional waste disposal; however, it is significantly less beneficial than waste reduction and reuse.

<u>Waste Reduction</u>

4. The Mayor should highlight the need to reduce waste entering the household as the most beneficial policy for diverting waste from landfill.

5. The draft MWMS correctly recognises recent decreasing levels of household waste in London. The Authority believes there is no conclusive evidence to show what these decreases are the result of. For example, one could speculate that this is due to economic climate or changes in waste collection methodology. This said the Authority invites the Mayor to set out the evidence for the achievability of this proposed target in London.

6. With regards to the national issue of producer obligations and packaging, The Authority suggest the Mayor works with existing arrangements and partnerships tackling the same issue so that further gains are made more quickly.

<u>Reuse</u>

7. Having successfully bid for LWARB money to take forward the London Reuse Network, LCRN are well placed to work with London's local authorities and third sector organisations to deliver a step change in London's reuse culture.

8. Sourcing reusable items requires a significant level of publicity to attract a good supply of quality feedstock. The Mayor should support the third sector and local authorities in getting this message across to London by providing a high level of regional-level communications and promotion. In particular, The Authority asks the Mayor to work with retailers to realise opportunities for bring-back schemes under the WEEE Directive.

9. The Authority is concerned with design standards for cheap-to-buy products. Widespread bring-back schemes would see such less durable products – that often can't be repaired for reuse – removed from the household waste stream. The Mayor, working closely with other stakeholders, could usefully influence and lobby

for standards on component parts of electrical appliances and bulky items. A reasonable standard where consumers can identify whether the item can be easily repaired or reused will go a long way to assist consumer choice. Similarly, information on whether a product's components can be easily recycled will help consumers make a more informed decision.

10. There is also much to achieve at a regional level for reusing textiles and clothing, whilst charity shops provide valuable support in this area further awareness and market development is required.

11. Producer responsibility aside, a key barrier to achieving zero waste direct to landfill is public awareness, consumer behaviour and public perception. The Authority has an aspiration for zero waste to landfill.

12. The Mayor must target complacency and help Londoners recognise that although their efforts with recycling are commendable, they are not enough to lift London from its heavy reliance on landfill disposal. There are common messages that the Mayor can disseminate to raise public awareness around:
    - Reuse – creating a culture where Londoners actively supply reusable items as well as demand and purchase them
    - Treatment facilities – Changing the negative public perception of waste treatment technologies and promoting positive aspects such as renewable energy and employment opportunities.
    - Recycling – increasing knowledge of the items, particularly packaging, Londoners take into their homes. Engendering a culture that leaves excess packaging at the point of purchase.
    - Recycling quality – the impact of contaminating the items they send for recycling
    - Climate change – setting food waste ambitions for London where reduction is the preferred outcome rather than collecting wasted food for composting or energy generation.

Policy 2: Setting a CO_2eq standard for municipal waste management activities to reduce their impact on climate change

13. The Authority sees no merit in the Mayor's intention to set his own waste hierarchy. Consistency of messages to the public is key and a slightly modified hierarchy for London could dilute the key messages of re-use and reduce.

14. The Authority tentatively welcomes a move towards carbon-based outcomes – however not in the context of needing to achieve London carbon-based outcomes along with meeting national tonnage-based targets. The Mayor is effectively subjecting London, which as he readily notes is underperforming in contrast to the rest of the country, to a more stringent framework for waste management than the rest of England. The Mayor acknowledges on page 95 that generally 'achieving high

rates of recycling and composting aligns with achieving the EPS'. Why therefore does he feel the Strategy needs to set performance for both?

15. Of concern is that the Mayor is not setting out the timeframe for the introduction of this 'whole system' approach. Nor has he set out how it will be applied or enforced across existing or new management options. A key concern is that a requirement on meeting the EPS may require costly new services to focus on 'higher impact' materials. Recent national consultations and research showed the cost implications for separated collection, resulting in a relaxation of government proposals for the time being.

16. Also of concern is that the Mayor is seeking to introduce this standard whilst the Authority is still required to perform to national and regional tonnage based targets. This seems at odds with the approach of the EPS. The EU Directive on which tonnage-based targets have emerged already sets out a waste hierarchy following painstaking consideration of a number of parameters including environmental impacts. The EPS could work against already high performing authorities by impacting their performance figures negatively. Additionally, the Mayor is seeking requirements for monitoring waste emissions and reporting and the Authority is concerned about the resourcing implications of this ancillary performance standard.

The Authority asks that the Mayor changes the wording of Policy 2 and its related proposals and targets to reflect that the EPS and Carbon Intensity Floor are not compulsory standards. 'The Mayor will set CO_2eq guidance to help reduce the impact of municipal waste management activities on climate change'.

<u>EPS Development</u>

17. The Strategy points out that a steering group 'contributed' to establishing a baseline for London. The Director of the Authority was a member of the Steering Group and felt that the Steering group was not given the remit of deciding a baseline but was presented with pre- modelled scenarios for comment.

18. The Mayor's Policy does not currently reflect a performance standard with buy-in from London's waste authorities.

<u>WRATE</u>

19. The Environment Agency's Waste and Resources Assessment Tool for the Environment (WRATE) seems to have been generally adopted as a useful assessment tool in assisting procurement, The Authority therefore support the proposal to use this tool in modelling a number of waste management activities for London. We do however oppose the proposal for an additional standard in principle.

20. Nationally, WRATE is being put forward as a tool which authorities can opt to use to inform their waste management options particularly during procurement. The

Government notes that emerging evidence and research could continually shape the guidance for waste management – this allows the rest of England the flexibility to meet the primary targets for diverting waste from landfill as they see fit.

21. The 'Ready Reckoner' may be a tool of limited value to Local Authorities for detailed design and procurement of services

Existing Facilities

22. The Authority welcomes recognition from the Mayor of the importance of existing waste infrastructure over the life of the Strategy and in relation to dealing with London's waste in a self-sufficient way.

Policy 3: Capture the economic benefits of municipal waste management

Economic opportunity

23. The Authority believes that market economics for treated waste falls outside of the Mayor's remit and influence. It is questionable that the value of products will provide a net source of income for any sustainable period given the costs of collection, transport and treatment. Clearly, the markets determine whether a waste product is useful or not and values it as such. The Mayor's role in enhancing this is to help in the provision of affordable access to appropriate infrastructure which will ultimately assist London's local authorities in meeting and exceeding quality requirements.
24. Recyclables are an internationally traded commodity and The Authority believes it would be more prudent if the Mayor's MWMS better recognised the potential trading implications of price and market fluctuations. The UK situation is such that at present we only have capacity to reprocess 50% of recycling collected. Many waste authorities have taken the decision to operated under a fixed price approach and 'share the risk' of such commodity price fluctuations.

The Authority asks the Mayor to withdraw financial projections for the next 20 years based on current prices for recycled materials and instead recognise that the market values for these materials can be volatile, focusing his support to waste authorities around this fact.

Waste authority contracts and facility ownership

25. In terms of proposing opportunities for waste authority owner/operator arrangements, The Authority opposes what appears to be a Mayoral policy interfering with the corporate risk management policies of individual authorities or authorities working in partnership to deliver waste management services. Even if local authorities were able to attract investment, the risk, financial or otherwise will be shouldered by them and not the Mayor.

26. It is important that the Mayor takes a wider view of the allocation of risks and rewards in the ownership and contracting structures inherent in waste management arrangements. In order to drive maximum value in terms of the cost of procurement

of a contracted service, any benefits (and ultimately risks) will inevitably be at the margins of performance.

27. Demand uncertainties for offtake materials will create significant implications for waste authority ownership of infrastructure. In the absence of a long term contract for feedstock supply it is likely that the any private sector finance would require significant balance sheet guarantees from the waste authorities. Even if contracts were in place, given that the waste authority would be supplier and beneficial owner it remains highly likely that balance sheet guarantees would be required. Further, there would be State Aid implications for authorities seeking to participate in a Joint Venture arrangement, using public monies to fund the project (including LWARB funds).

28. The Authority questions what resource the Mayor feels he could provide that would add value to existing local authority procurement arrangements and evaluation. There is existing government support from bodies such as Defra WIDP in relation to waste authority facility ownership opportunities. That said the Authority believes there may be benefit in developing model approaches to contracting, and although ultimately this is not a role for the Mayor, the Authority welcomes the proposal to examine the need for this.

Policy 4: Achieving high municipal waste recycling and composting rates

The Targets

29. As already mentioned, The Authority supports the Mayor's focus on waste reduction. However, the Mayor needs to fully recognise and assess the level of interdependency between the waste management policies and targets he is proposing.

30. The Mayor has recognised that London is performing in line with the rest of England on dry recycling rates, however the Strategy goes on to criticise London as the worst performing region on overall municipal waste.

31. WRAP and DEFRA research recognises that the co-collection of green waste and food waste reduces the proportion of food waste diverted from landfill, and thus again compromises waste minimisation, diversion from landfill and recycling from the existing waste stream.

32. Bearing such findings in mind, the Authority invites the Mayor to include a proposal around supporting a London-wide initiative in consultation with boroughs to promote home composting.

33. Conversely, the Mayor should recognise the interdependencies in reverse – where successful proposals for waste reduction and reuse will impact on tonnages for recycling.

34. The Authority believes that regional targets should reinforce national targets, reflecting London's particular circumstances. The Authority does not oppose the Mayor's proposed focus on municipal waste, or the use of specific, time-based targets, but they should have regard to national targets and London's demographics.

The Authority calls for the Mayor to set realistic targets, which reflect London's ability to help the nation meet national and EU targets. Relevant targets should take into consideration the above issues around composting as well as high density housing, transient population and socio-economic circumstances.

35. The Mayor should make clear his intention to focus efforts primarily on the prevention of food waste whilst working with authorities and relevant commercial enterprises to more widely provide separate food waste collection in line with the food to fuel initiative.

Incentive schemes

36. Incentive schemes need to be approached with caution. The Authority sees potential conflicts between an overall long term policy of waste reduction and reuse versus incentives for producing more waste for recycling and composting as well as between pushing residents to be more socially responsible about the quality of recyclate and advocating incentives for co-mingled collections.

37. In support of the focus on waste reduction under Policy 1, it is The Authority view that incentive schemes, where they are found to be beneficial, should be targeted at rewarding consumers or households diverting waste further up the waste hierarchy, rather than solely on recycling.

38. The Authority suggests that incentive schemes should be used at a national level to stimulate the market for re-use and new products made from high percentages of recycled materials. This could be done by a VAT exemption for items for re-use or made from 100% recycled material. New goods, with a lower percentage of recycled material could receive a pro-rata reduction in VAT duty.

39. The Authority supports the Mayor's focus on securing quality recyclate. Rather than relying on costly changes to collection infrastructure and at source separation the Mayor should focus efforts on engendering a culture of change. Consumers should become more aware and accountable for reducing their waste and increasing recycling rates particularly through reducing the level of household contamination of recyclable or compostable waste.

40. Further to this point, the Mayor should recognise that the separate collection of any waste materials can be costly and difficult in built-up areas where collection and storage options are constrained. This approach will not be suitable for all.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

41. The Mayor has pointed to an interest in retrofitting existing incinerators.

42. The Authority recognises the external pressure facing the Mayor in regards to managing as much of London's waste within the region as possible. London's local authorities face a number of competing pressures on land including the provision of waste management facility sites.

43. The Waste Framework Directive does not require individual EU member states to possess the full range of final recovery facilities. The Authority supports the similar pragmatic approach being taken by the Mayor for the London region. The Mayor's policy should not be so rigid as to prevent other opportunities coming forward, particularly under the proximity principle.

44. When considering the issue of self-sufficiency the Mayor should take into account the carbon benefits of sustainable transport (water, rail etc). It may be better to export some waste out of the London area for treatment by river or rail, rather than haul it across central London for in area treatment.

Policy 6: Achieving a high level of street cleanliness

45. The Authority will leave its constituent boroughs to submit detailed comments on this policy

Boris Johnson
Mayor of London
City Hall
The Queen's Walk
London SE1 2AA

14th January 2011

Dear Boris,

As the Chairs of the four statutory joint waste authorities responsible for the disposal of some two-thirds of London's municipal waste, we are writing to raise a number of real concerns about your draft municipal waste strategy.

1. Waste Prevention Target

Whilst we wholeheartedly support giving priority to waste prevention, we are most concerned that there is insufficient detail on how the objective will be achieved and by whom. We do not believe that local authorities have it in their direct control or even influence to reduce the amount of waste generated per household by 20%. Furthermore we request that you confirm in the strategy that waste authorities will not be directed against 'over' providing waste facilities by reference to this objective, given our open-ended duty to manage municipal wastes and the absolute imperative to do this as cost-effectively as possible.

2. Recycling Target

The target of achieving a 60% municipal waste recycling rate across London, whilst laudable, is likely to place an unreasonable burden on the public purse at this difficult time of competing spending pressures. High levels of recycling rely heavily on green and organic wastes and given the relatively low levels of green waste arising in the London region and the high (and increasing) proportion of flatted properties this looks unachievable without very significant expenditure. Indeed your own report prepared by Eunomia[1] states that "*in initial years ... annualised collection and recycling costs increase significantly for Boroughs*", just as budget pressures are historically high. Our own detailed modelling shows that achieving 50% will already require the full use of all the available policy levers. We therefore request that the 60% target should be a stated aspiration and not something that the Mayor should ever direct waste authorities to achieve.

3. Climate Change

We fully support the need to manage the CO_2 impacts of waste services, and are not opposed to a gradual shift from weight-based targets to carbon-based targets as the next round of European Directive targets are set. In the meantime, we support a requirement on waste authorities to formally assess their services using WRATE and to be accountable for their performance in this regard.

[1] "Economic Modelling for the Mayor's Municipal Waste Management Strategy", Eunomia, April 2010

However we do not believe that waste authorities should be directed to implement services and technologies by reference to the most modern gas power station in order to achieve the best practicable environmental option. This is an inappropriate benchmark for waste facilities and services that can only lead to high cost and potential risk with new and unproven technologies. Whilst comparison with gas fired energy generation may be considered appropriate for environmental purposes, a mixed energy economy is preferable to mitigate the risks associated with volatile gas supplies. The environmental 'cost' may be considered an appropriate price to pay for certainty of generation.

4. Waste-derived fuels

We believe that the target for waste-derived fuels to be 90% biomass places an unnecessary and potentially unachievable challenge on waste authorities. We advocate rather that a 50% biomass content is applied as this is more appropriate to municipal waste.

In conclusion, we confirm that we wish to work with you in order to continuously improve the management of London's municipal waste, and will support you in lobbying for the resources and wider policy and legislative changes that will be necessary.

At this particular time of financial restraint, however, we must emphasise the inescapable need to consider what is achievable and affordable in the short to medium term. This does not need to diminish our long-term aspirations but we urge you to use the strategy carefully to drive good practice and high performance without binding us to do things that are not currently practicable.

Yours sincerely,

Councillor Steven Kelly, Chair,
East London Waste Authority

Councillor Clyde Loakes, Chair,
North London Waste Authority

Councillor Bassam Mahfouz, Chair,
West London Waste Authority

Councillor Tim Ahern, Chairman,
Western Riverside Waste Authority

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Our reference: LC Response to October 2010 Mayor's MWMS
Your reference:
Date: 10 January 2011

Dear Boris,

London Councils response to the Mayor's draft Municipal Waste Management Strategy

London Councils represents all 32 London boroughs, the City of London, the Metropolitan Police Authority and the London Fire and Emergency Planning Authority. We are committed to fighting for fair resources for London and getting the best possible deal for London's 33 councils.

London Councils responded to the previous draft released in January 2010 and your public draft has made some welcome changes. However there remain a number of proposals which raise concern especially the application of a new Emissions Performance Standard.

Our response highlights the difficulties ahead, in terms of developing London's infrastructure and future capacity to meet the challenges of zero waste to landfill and for self-sufficiency within the life of this Strategy. In order for you to achieve the vision set out in this strategy, much more time and investment needs to be put into educating key players, increasing the delivery of infrastructure, streamlining the planning processes, and providing funding to make it easier to recycle in flats and estates.

We would like to see not only prominence given to what we do with waste once collected, but also equal emphasis on initiatives to reduce both the tonnages of waste entering the household waste stream, as well as the range of materials we have to collect and process.

Some of the targets and proposals in your strategy will require changes to existing management practices, the costs of which will be very high in many cases. The Government's 2010 settlement has left London's local authorities facing massive funding cuts. Capital funding to the London Waste and Recycling Board (LWARB) was also cut as part of Defra's in-year savings for 2010. Additionally we are seeing uncertainty around funding from the London Development Agency to LWARB. Furthermore, the Government has now withdrawn PFI funding to two significant London waste infrastructure scheme. Collectively, these decisions leave London severely financially disadvantaged.

The situation now needs a strong lead from you, alongside London's local authorities in lobbying central government to ensure London gets its fair share of funding for waste infrastructure which will in turn help to deliver your municipal waste management strategy. I look forward to working together with you to make the case for London.

Yours sincerely,



Cllr Catherine West
Chair of the London Councils Transport and Environment Committee

The Mayor's Draft MWMS Public Consultation – London Councils Response

Overview

1. London Councils has set out its response to the draft Municipal Waste Management against the six proposed policies and the relevant targets for each. We focus this response on the key issues for London's waste authorities with a more detailed range of matters covered in Appendix A.

2. On a general note, we expect that the GLA will update the Strategy in light of more recent information now available so that the 2009/10 municipal waste management data, and recent announcements on the status of Capital Ambition, National Indicators and the withdrawal of PFI waste funding to London's waste authorities are all taken into account.

3. Our response focuses on the key areas whilst a detailed response can be found at Appendix A.

Policy 1: Informing producers and consumers of the value of reducing, reusing and recycling municipal waste

4. London Councils supports a Mayoral policy on reducing and reusing waste. However the Mayor should strengthen his proposals for meeting higher levels of reduced municipal waste.

5. Whilst recycling has its merits there is a real need – in meeting self sufficiency and achieving cost savings – to reduce waste generation. Generally, recycling has obvious environmental benefits compared with traditional waste disposal however it is significantly less beneficial than waste reduction and reuse.

Waste Reduction

6. The Mayor should highlight the need to reduce waste entering the household waste stream as the most beneficial policy for diverting waste from landfill.

7. The draft MWMS correctly recognises recent decreasing levels of household waste in London and has set a 20% reduction target by 2031 (based on 2008 levels). London Councils believes there is no conclusive evidence to show the cause of these observed decreases. For example, one could conjecture this is due to the economic climate or changes in waste collection methodology. London Councils would like to see a clear evidence base for the achievability of this target in London.

8. There is significant scope for minimisation from working with small businesses and the food and hospitality industry within London. There are also significant opportunities from exploring the issue of producer obligations and packaging. London Councils and London's waste authorities are keen to work with the Mayor to deliver London-specific approaches, working through existing arrangements and partnerships already tackling these issues, so that further gains are made more quickly.

Reuse

9. Having successfully bid for LWaRB funding to take forward the London Reuse Network (LRN) the London Community Resource Network (LCRN) is well placed to work with London's local authorities and third sector organisations to deliver a step change in

London's reuse culture. The Mayor must support the high level of regional-scale communications and promotion this initiative will need to succeed.

10. Sourcing reusable items requires a significant level of publicity to attract necessary supply of quality feedstock. The Mayor should support the third sector and local authorities in getting this message across to Londoners by providing a high level of regional-level communications and promotion. In particular, London Councils would like to see the Mayor working with retailers through LWARB and the LRN to realise opportunities for bring-back schemes such as under the Waste Electrical and Electronic Equipment (WEEE) Directive.

11. London's waste authorities have concerns with design standards for 'cheap-to-buy' products. Widespread bring-back schemes will begin to gather in such less durable products – that often cannot be repaired for reuse – and remove them from the household waste stream. The Mayor, working closely with other stakeholders, could usefully influence and lobby for standards on component parts of electrical appliances and bulky items. A reasonable standard - similar to food nutritional values or appliance energy efficiency ratings - where consumers can identify whether an item can be easily repaired or reused will go a long way to ensure the availability of quality products for reuse. Similarly, information on whether an item's components can be easily recycled will help consumers make a more informed decision.

Target - Zero waste direct to landfill by 2025

12. Producer responsibility aside, a key barrier to achieving zero waste direct to landfill is public awareness, consumer behaviour and public perception. London Councils TEC members themselves set out an aspiration for zero waste to landfill in their Position Statement in 2008.

13. The Mayor must target complacency through his Strategy and help raise awareness across London about the need to shift the region away from its heavy reliance on landfill disposal. There are common messages that the Mayor can disseminate to raise public awareness including:
    - Reuse – creating a culture where Londoners actively supply reusable items as well as demand and purchase them
    - Treatment facilities – helping to overcome the negative public perception of waste treatment technologies
    - Recycling – increasing knowledge of the items, particularly packaging, Londoners take into their homes. Engendering a culture that leaves excess packaging at the point of purchase.
    - Recycling quality – the impact of contaminating the items they send for recycling
    - Climate change – setting food waste ambitions for London where reduction is the preferred outcome (rather than collecting wasted food to be used as fuel).

Policy 2: Setting a CO_2eq standard for municipal waste management activities to reduce their impact on climate change

14. The Mayor intends to set his own waste hierarchy in his Strategy as a tool to guide waste authorities. This is acceptable (although potentially confusing) and London Councils would prefer to see the proposed Emissions Performance Standard (EPS) and the performance target for energy generation from residual municipal waste (the so called 'carbon floor') also implemented as an advisory tool rather than a requirement. The Mayor should view this as a tool to help to set the tone for the future of London's waste

management rather than a requirement for waste authorities in order to be in conformity with this Strategy.

15. London's waste authorities commend the move towards carbon-based outcomes and acknowledge that the EPS and the carbon floor are innovative approaches to the way London seeks to manage its waste arisings in the future. London Councils also welcomes a focus on climate change in waste management practices and supports a move away from tonnage based targets towards carbon-based outcomes. However the proposed concepts are unworkable within the context of requirements to also meet tonnage-based targets.

16. In pursuing Policy 2, the Mayor is effectively subjecting London, which as he readily notes is underperforming with regards to meeting waste targets compared to the rest of the country, to a more stringent framework for waste management than the rest of England. The Mayor contends on page 95 of the draft Strategy document that 'generally, achieving high rates of recycling and composting aligns with achieving the EPS'. Why therefore does he feel the Strategy needs to set performance for both?

17. There are a number of concerns around the implementation of the EPS. The Mayor is not proposing over what timeframe he is introducing this 'whole system' approach. He has not set out how it will be applied or enforced across existing or new management options. . A further key concern is that a requirement on meeting the EPS may require costly new services to focus on 'higher impact' materials. Recent national consultations and research showed the high cost implications for single stream collections, which resulted in a relaxation of such government proposals for the time being.

18. The Mayor is also seeking to introduce this 'Standard' while London's waste authorities are still under the requirement to perform to national and regional tonnage-based targets. London Councils believes the EPS can be at odds with the national tonnage-based approach. The EU Directive on which tonnage-based targets have emerged already sets out a waste hierarchy following painstaking consideration of a number of parameters including environmental impacts. The EPS could work against already high performing authorities by impacting their performance figures negatively. Additionally, the Mayor is seeking requirements for monitoring and reporting against this Standard annually. London Councils is concerned about the resource implications of this ancillary performance standard both for the GLA and for London's waste authorities.

London Councils supports reference to the Mayor's waste hierarchy as a guide and invites the Mayor to mirror this flexibility within the London Plan.

London Councils seeks that the Mayor changes the wording of Policy 2 and its related proposals and targets to reflect that the EPS is not a compulsory standard.

<u>EPS Development</u>

19. The Strategy points out that a steering group 'contributed' to establishing a baseline for London. The feedback London Councils has had from waste authority representatives is that the Steering Group was not given the remit of deciding a baseline but was presented with the modelling scenarios for comment. The Mayor's Policy does not reflect a performance standard with buy-in from the stakeholder steering group and the wording should reflect this more accurately.

20. There are a number of areas where London Councils believes the 'Standard' falls short and should therefore be downgraded to a guide or information tool, including:

- If this is to be introduced as a requirement nationally, London's waste authorities will have to implement it. At present Government is only promoting WRATE as a tool for waste authorities to use on a voluntary basis. London Councils supports this national approach.
- The feasibility of achieving this Standard will be improved with LWaRB providing waste authorities with collection infrastructure funding. At present, this is not the case.
- There are disincentives and counteracting factors across the Mayor's targets and within the EPS itself that will result in confusion for application of the Mayor's proposals and make his targets less achievable. For example, the EPS allows for or even encourages a narrower focus on collection impacting tonnage targets for recyclates.
- There are a number of assumptions forming the 'evidence' base for this Standard which do not provide satisfactory rigour on which to base an enforceable standard over the life of the Mayor's Strategy. It is also incomplete due to the omission of reuse figures – and reduction figures beyond Mayoral targets.
- The underlying model lacks appropriate cost modelling and an impact assessment of the implementation of this 'Standard' for London's waste authorities. London Councils believes that the data used by the GLA is incomplete and does not represent an accurate picture of the current costs or the expected costs of moving to this Standard. For example, the assumptions for the cost of waste management to the average London tax payer reflected in the Strategy is widely exaggerated. We believe that the costs for waste authorities will be significant as they will be required to change management practices in order to meet this ancillary standard. Additionally, the Mayor has assumed steady market positions for recyclates but in reality, given the nature of local authority waste contracts, this will not be realised.
- With regards to the carbon floor, London Councils is concerned that the GLA energy standards are misaligned with national guidelines. The primary focus must for now be on diverting waste from landfill. In order for London to meaningfully work towards this in the short to medium term, the Mayor must take a pragmatic approach to the continued use of existing infrastructure within London. Energy production should be a secondary, though important, consideration.

London Councils does not believe that the Mayor has provided sufficient information or scientific evidence to support the introduction of the EPS. We ask that the Standard be removed from the Strategy. If it is to be retained in some form, the Strategy must acknowledge that it is 'work in progress' and subject to review, with the Mayor's proposal downgrading the Emission Performance model to a guidance tool which waste authorities and relevant parties can use voluntarily.

21. Without prejudice to our preference to see this proposal withdrawn, London Councils queries what process and timeline the Mayor will have for rolling this proposal out. The modelling is very technical and stakeholders will need to be made aware of what this Standard will mean in practice. In its current form, London Councils does not believe the EPS is fit for adoption via the Strategy. It is incomplete given the omission of reuse figures – and reduction figures beyond Mayoral targets.

<u>Existing Facilities</u>

22. London Councils welcomes recognition from the Mayor of the importance of existing waste infrastructure. We ask that the Mayor recognise via his Strategy the importance of existing EfW sites in relation to dealing with London's waste in a self-sufficient way.

23. London Councils sets out our response with respect to this more fully under the comments for Policy 5.

Policy 3: Capture the economic benefits of municipal waste management

Contract Sharing and Model Contracts

24. London Councils does not see any justification for the Mayor seeking to get involved in drawing frameworks for collection services and then monitoring any resulting contracts and we request that Proposal 3.2 be removed entirely from the Strategy. London Councils will work with the LWaRB, waste authorities and other relevant parties to examine the need for model contracts and model approaches as appropriate.

25. Pressures on waste authority services from public spending cuts mean waste authorities will review opportunities for increasing service efficiencies and performance as a matter of course. This does not require a separate identification and implementation work stream within the GLA. London Councils agrees that model contracts can be of benefit to waste authorities. However, the benefit may vary depending on the materials a waste service might target e.g. model contracts for textiles may be more practical than say kerbside services. .

26. Joint procurement contracts can be successful. However, success is dependant on local contract arrangements and on local circumstances being suitable e.g. the streamlining of contract commencement dates or the configuration of services. Some options will be more feasible than others and the Mayor should direct LWaRB to assist in 'brokering' such deals and opportunities.

The Mayor must remove Proposal 3.2 (page 106) as currently drafted as it goes beyond the Mayor's strategic remit. London Councils supports a need to investigate opportunities for efficiencies and cost savings via contractual arrangements. LWaRB may therefore seek to consult boroughs on developing a framework for waste collection contracts in preparing its business plan for 2011/12. London Councils will consider the proposal at that time to ensure a flexible approach to the application of any resulting frameworks or model contracts with waste authorities using these on a voluntary basis without any impact on access to LWaRB funding.

Economic opportunity

27. London Councils believes that market economics for treated waste falls outside of the Mayor's remit and influence. In our appendix to this response, London Councils has made specific mention of Table 3 with a recent example of market volatility. Recyclables are an internationally traded commodity and London Councils believes it would be more prudent if the Mayor's MWMS better recognised the potential trading implications of price and market fluctuations. The UK situation is such that at present we only have capacity to recycle 50% of what is collected. Many waste authorities have taken the decision to operate under a fixed price approach thus 'sharing the risk' of such commodity price fluctuations.

Policy 4: Achieving high municipal waste recycling and composting rates

The Targets

28. As already mentioned, London Councils supports the Mayor's focus on waste reduction. However, the Mayor needs to fully recognise and assess the interplay between the waste

management policies and targets he is proposing. London Councils does not oppose the Mayor's proposed focus on municipal waste, or the use of specific, time-based targets. However, we do ask that the Mayor reflects the interdependencies of his targets operating in reverse – for example, where successful waste reduction and reuse initiatives will cause tonnages for recycling to fall.

29. The Mayor has recognised that London is performing in line with the rest of England on it's dry recycling rates, however the Strategy goes on to criticise London as the worst performing region on overall municipal waste. London Councils has consistently lobbied the Mayor to recognise this is an unfair comparison. The Mayor overlooks the fact that the vast majority of those 'higher performing' English councils have achieved this performance through the provision of free, universal collection of green garden waste.

30. There is a limited supply of residential garden waste in London - particularly the inner-London boroughs - any policy designed to increase headline recycling rates by sourcing such material will be significantly more difficult for London to achieve. The Mayor should concentrate on increasing food recycling much of which involves diversion from the residual waste stream, although food waste collection from high density properties has its own set of challenges

31. Bearing this in mind, London Councils invites the Mayor to include a proposal around supporting a London-wide initiative in consultation with boroughs to promote home composting.

32. Further, we ask the Mayor to clarify his position with respect to current discussions between our government and the European Commission regarding Publicly Available Specification (PAS) requirements for composting to qualify as recycling. London Councils has raised concerns over the timing for introducing a standard for this practice although has generally welcomed the proposed approach subject to a lead-in time beyond the length of time it takes to formally achieve certification.

London Councils calls for the Mayor to set realistic targets, which reflect London's ability to help the nation meet national and EU targets. There is little point in setting unachievable targets. Relevant targets should take into consideration the above issues around composting as well as the high density housing, transient population and socio-economic circumstances prevalent in the region. More importantly, these targets must reflect an appreciation of the conflicting influence that other targets and approaches, such as the EPS, will have on achieving targets individually and collectively. We ask the Mayor to investigate this further and revise his targets accordingly.

33. The Mayor should make clear his intention to focus efforts primarily on the prevention of food waste whilst working with authorities and relevant commercial enterprises to more widely provide separate food waste collection in line with the food to fuel initiative.

<u>Contributions from other activities</u>

34. London Councils queries the reference on pages 115 and 116 with respect to waste authority municipal waste collections. The current definition of municipal waste does not include municipal park green waste and so would not be included in waste authority municipal recycling and composting figures.

<u>Incentive schemes</u>

35. Incentive schemes need to be approached with caution. London Councils sees potential conflicts between an overall long term policy of waste reduction and reuse versus incentives for producing more waste for recycling and composting as well as between pushing residents to be more socially responsible about the quality of recyclate and advocating incentives for co-mingled collections.

36. In support of the focus on waste reduction under Policy 1, it is London Councils view that incentive schemes, where they are found to be beneficial, should be targeted at rewarding consumers or households diverting waste further up the waste hierarchy, rather than solely on recycling.

37. London Councils supports the Mayor's focus on securing quality recyclate. Rather than relying on costly changes to collection infrastructure and at source separation the Mayor should focus efforts on engendering a culture of change. Consumers should become more aware and accountable for reducing their waste and increasing recycling rates particularly through reducing the level of household contamination of recyclable or compostable waste.

38. Further, the Mayor should recognise that the separate collection of any waste material stream can be costly and difficult in built-up areas where collection and storage options are constrained. This approach will not be suitable for all.

SMEs

39. Although the Mayor does not have any statutory powers with respect to trade waste, London Councils supports the direction to LWaRB to showcase good practice, which should be an element of the Mayor's proposals under Policy 3. Waste authorities will be considering opportunities for further work with local businesses in the context of budget cuts. However, the Mayor must fully comprehend such working arrangements within the context of existing collection infrastructure, the Landfill Allowance Trading Scheme, the Controlled Waste Regulations and the competitive market for commercial waste collection where not all players are subject to the same statutory instruments.

40. With specific regard to food waste, it may be more productive to tailor the Mayor's policies and assistance towards making it easier to collect large amounts of food waste from fewer, larger producers. The Mayor and waste authorities will need to work closely with the larger retailers who are already developing approaches to this issue with the help of organisations such as WRAP.

41. London Councils expects a stronger direction from the Mayor to the LWaRB on the provision of funding for collection infrastructure to achieve such proposals. If London is to move towards the Mayor's targets and aspirations of waste management, more must be done to allow London's waste authorities to have greater access to the sole source of regional funding for waste and recycling.

42. Furthermore, the Mayor could usefully add value to this process by supporting recycling levels of small businesses by raising awareness of their responsibilities and promoting good practice with authorities that have put arrangements in place with local businesses. Specific funding for targeted initiatives could also be provided through LWaRB.

London Councils welcomes support via LWaRB to waste authorities for the dissemination of good practice work on waste and recycling but asks that the Mayor acknowledge the constraints for increased partnership work with local SMEs particular as the Mayor has no statutory powers to direct trade waste. We also seek a stronger

regional campaign to ensure businesses are aware of their responsibilities and good practice for their own waste management.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Existing infrastructure

43. London Councils welcomes the Mayor's recognition of the important role London's existing infrastructure plays in managing municipal waste, regardless of its energy performance. Waste authorities however are concerned that Mayoral targets remove the flexibility to continue using such sites over the life of the Strategy and indeed, the life of existing Energy from Waste (EfW) facilities.

44. The Mayor has pointed to an interest in retrofitting existing incinerators. London Councils asks that the Mayor firstly recognise that the first priority is to divert London's waste from landfill and that energy capture is secondary. The cost of retrofitting may be significant and we query whether the Mayor has earmarked funding to assist with this or if LWaRB are being directed to provide funding. London Councils calls on the Mayor to consult directly with the stakeholders to identify how any resource targeted at existing infrastructure might best meet local priorities for waste management.

Self Sufficiency

45. London Councils has set out its opposition to the Mayor's self sufficiency targets during the consultations on the Draft Replacement London Plan. London Councils recognises the external pressure facing the Mayor in regards to managing as much of London's waste within the region as possible. However, London Councils takes the view that the region should not be focusing resources on attempting to achieve self-sufficiency. London's local authorities face a number of competing pressures on land including the provision of waste management facility sites.

46. London Councils does not support the inclusion of the 100 per cent target, particularly in light of the difficulty in waste planning and investment in infrastructure in London. London Councils would like to work with the Mayor to develop agreed approaches to streamlining the planning process. Delays in planning currently add significant costs and time to proposals for new waste infrastructure, including those promoting new and emerging technology and more sustainable treatment of waste. London Councils would be willing to take a more strategic approach to this issue in consultation with all the London planning authorities.

47. We recognise the Mayor's Business Waste Strategy is not statutory however the Mayor fails to recognise the opportunities from the commercial and industrial sector in relation to greater self-sufficiency.

48. London has made recent gains in improving the levels of municipal waste dealt with within the region. London Councils asks that self-sufficiency be considered more openly and transparently in the context of exchanges at the economic and social levels between the Home Counties and London. Factors such as the levels of waste coming into London from the Home Counties as well as forecasted capacity of the relevant landfill sites should also be considered.

49. Further analysis of the Home Counties contribution to London's overall waste arisings and also the benefits derived from being London's neighbours should be considered in

determining, within the context of other land use pressures, whether the totality of the Capital's waste is its own burden to bear now or in the future.

50. The Mayor in his Transport Strategy 2010 observes that "London is unique among the British regions in that a significant proportion of its workforce resides in neighbouring region. Therefore the economic success of London and the Greater South East (GSE) are inextricably linked." So long as there is mutual advantage in terms of employment opportunities and the transport networks exist to support this, then surely waste infrastructure and shared waste management arrangements must be factored into this inextricable link.

The Waste Framework Directive does not require individual EU member states to possess the full range of final recovery facilities. London Councils would like to see a similarly pragmatic approach being taken by the Mayor for the London region. The Mayor's proposal should not be so rigid as to prevent other opportunities coming forward, particularly where they fulfil the proximity requirement.

New Infrastructure

51. London Councils invites proposals from the Mayor on supporting waste authorities in matching their collection services to new and emerging treatment facilities. This will require access to funding to invest in new collection infrastructure beyond vehicles.

52. With regards to the planning process, London's local authorities face competing local priorities and national targets for the use of land. With respect to waste services, existing contracts can act as barriers to the development of infrastructure. If uncertainty can be removed, then waste authorities and the market should be able to deliver the necessary investment.

London Councils asks that the Mayor places greater emphasis on LWaRB funds going directly to waste authorities to finance collection infrastructure to complement new and emerging treatment facilities. It is well recognised that in order to move towards different waste management practices, costly collection infrastructure to meet the specifications for disposal sites will be required. We also ask the Mayor to direct the London Waste and Recycling Board towards better contractual outcomes

London Councils would be keen to work with the Mayor and his representatives to improve waste planning processes. London Councils would like to see a more pragmatic, strategic approach to self-sufficiency in consultation with all the London planning authorities.

Policy 6: Achieving a high level of street cleanliness

53. .The Mayor wants to achieve a high level of street cleanliness. This is welcome within the context that the quality of the local environment and the street scene is a function of London's local authorities. Where the Mayor could add value is in working with boroughs on pan-London schemes where common messages can be applied such as promoting the online reporting tool based on best practice from Lewisham.

54. The Mayor should engage relevant commercial partners and explore funding opportunities to implement regional campaigns and initiatives to engender behavioural change on waste and litter across London's residents, visitors to London and commercial enterprises.

55. The 2012 Olympic Games provides a good regional focus for joint work with the Mayor over the next couple of years especially in jointly seeking funding for specific interventions. There is also a need for regional and national publicity campaigns to encourage public involvement in contributing to street cleanliness and the development of common messages that would work across all authorities.

56. A strong campaign against cigarette ends and chewing gum litter is welcome. London Councils suggests the commercial companies referred to under Proposal 6.7 on page 148 be highlighted as case study examples rather than promoted above all others in the market, especially given the life of the Strategy over two decades.

57. London Councils welcomes stronger partnership working with transport providers to promote recycling and litter-bins for commuters and visitors to London. As with household recycling, campaigning and information to ensure limited contamination will be required to support this initiative. The Mayor must factor in the ongoing maintenance and education costs to ensure these schemes are sustainable and successful.

Appendix A – London Councils Response to the Draft Mayor's MWMS – further detailed comments

Page	Ref.	Mayor's Draft Text	London Councils Comment
	Proposal 1.1	Setting waste reduction and reuse targets	In order to accurately measure success, a robust reporting system must be arrived at to calculate tonnages more accurately.
	Proposal 1.2	Supporting London-wide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling	London Councils supports regional emphasis on the top tiers of the waste hierarchy. The Mayor must recognise the need for a prolonged campaign exercise, targeting all age groups, and recognising the impacts of transient population and the magnitude of commuters and visitors to London.
	Proposal 1.3	Reducing the amount of municipal waste entering the waste stream	London Councils asks that the Mayor consider further opportunities for reducing food waste, particularly in his work with leading businesses.
	Proposal 1.4	Tackling barriers to providing effective reuse services	The Mayor must identify resource for ensuring that businesses and residents engage with the LRN and utilise this resource. Given the timing with the current economic climate it is important that this be marketed as a cultural change for life, rather than a short-term 'fad'.
12 & 22	Objective 1	Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible	Barriers: ○ Need for behavioural change on reduction and reuse ○ Investment in infrastructure Opportunities: ○ Campaigning targeted at public, visitors to London and businesses (high profile and local) ○ Planning process re-engineering ○ Changes to LWaRB funding priorities to include collection infrastructure
12 & 22	Objective 2	Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.	Barriers: ○ Existing waste contract arrangements ○ Competing local priorities ○ Timing and investment barriers to infrastructure delivery Opportunities: ○ Efficiency savings resulting in carbon outcomes ○ Realising opportunities for partnership and joint

Page	Ref.	Mayor's Draft Text	London Councils Comment
			working.
12 & 22	Objective 3	Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.	Barriers: ○ Constraints on separate waste collections ○ Constraints on wider collaboration with SMEs ○ Landfill diversion versus energy production ○ Volatile market for recycled materials ○ Consumer engagement in the London Reuse Network Opportunities: ○ Capitalising on the current economic climate and the downturn in municipal waste tonnages ○ Regional messages and campaigning ○ Funding support to link waste authority collection services with new waste treatment sites.
12 & 22	Objective 4	Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.	See our response to Policy 5
12 &22	Target 1	To achieve zero municipal waste direct to landfill by 2025	See our response on Target 1
12 & 22	Target 2	To reduce the amount of household waste produced from 970kg per household in 2008/09 to 790kg per household by 2031. this is equivalent to a 20 per cent reduction per household	<u>Reduction</u> London Councils welcomes the Mayor's focus on reduction. Invite the Mayor to direct greater funds and focus to communications and capaigning for both the public and the business sector. Whilst reuse and recycling initiatives have great merit in diverting waste from landfill, for waste authorities, reduction and waste prevention is preferential because: • It removes the cost of collection and treatment / disposal and; • It can be accompanying by greater responsibility on the retail sector to deal with their waste under the polluter pays principal instead of being dealt

Page	Ref.	Mayor's Draft Text	London Councils Comment
			with via taxpayer money. Lowering the tonnages of waste entering [and leaving] the household waste stream requires a range of changes across the design, business practices and household behaviours: • A reduction in packaging waste and light-weighting • Durable and sustainable design allowing for preparation for reuse • Recyclable packaging and components • Education and awareness Under total waste considerations, the Mayor could focus on strategic campaigning for visitors or working commuters to London who according the Environment Agency State of the Environment report contribute signficantly to waste, including lunch time tonnages of 263 tonnes of waste. The Mayor should work with businesses, food outlets, transport operators and the boroughs to encourage visitors to reduce waste as far as possible.
12 & 22	Target 3	To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031.	London Councils welcomes this focus on reuse and asks that the Mayor allocate sufficient resource to ensure Londoners and businesses engage with this paradigm shift in perceiving household waste as a resource.
12 & 22	Target 4	To recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031.	Further to the Mayor's suggested considerations for visitors to London under total waste considerations, where waste is unavoidable i.e. where the level of packaging required for product preservation and saleability is at its lowest and is recyclable, the Mayor should work with business, food outlets, transport

Page	Ref.	Mayor's Draft Text	London Councils Comment
			operators and the boroughs to encourage visitors to recycle through: • Food outlets and retailers providing recycling facilities for customers and only using recyclable food packaging • Event venues and organisers providing recycling facilities • At-work recycling schemes and hotel room based recycling • Directing funding and support to 'on the go' street recycling, working with potential sponsorship on a regional basis through major chains including supermarkets and food outlets.
12 & 22	Target 5	The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately: 1.2 million tonnes of CO_2eq in 2015, 1.4 million tonnes of CO_2eq in 2020, 1.6 million tonnes of CO_2eq in 2031	See our response to Policy 3
12 & 22	Target 6	To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.	We ask that the Mayor continue to recognise the constraints for London's waste authorities to adopt a standardised approach towards green waste collection. This should be promoted and enhanced where feasible with greater financial support to initiatives such as the flats recycling programme via the London Waste and Recycling Board.
Various e.g. 30	Statistics	The use of out-of-date data throughout the draft Strategy in particular 2008/09 municipal waste figures	London Councils asks the Mayor to include the most up-to-date data in his Strategy. At the time of going to consultation year 2009/10 statistics – particularly for municipal waste - were available for inclusion in the draft Strategy. Although the life of the Strategy. Outdated data is inevitable in a strategy with such a life span

Page	Ref.	Mayor's Draft Text	London Councils Comment
			however year on year performance improvements for London are quite significant and as these statistics are available ahead of final publication the Mayor should include them.
60	First paragraph	'The total cost to London of managing its municipal waste, including the collection, transport, treatment and final disposal activities….£242 for the average council tax payer'	London Councils queries the accuracy of this figure. We believe the average to be overstated. The Mayor's calculated does raise concerns for London Councils, casting doubt over the financial figures and projections he is utilises in this Strategy.
60	Third paragraph	'The main effect the landfill tax has had over the past six years…..Today landfill tax stands at £48 per tonne.'	London Councils proposes that the Mayor more accurately set out the cost implications for waste authorities as far as land fill tax and recycling cots are concerned. The Mayor's Strategy presently ignores that fact that the increase in landfill tax has driven up borough costs. Recycling may now be cheaper than sending waste to landfill but the practice of recycling is still significantly more expensive than before. It is not correct for the Mayor to ignore the resultant increase in costs to waste authorities of collecting recyclates.
62	Table 3	Potential Revenue from recyclable waste	This table is misleading. The Mayor fails to recognise the market fluctuations accurately – for example, it is only a few years since paper was negatively valued. At one point some waste authorities were paying paper mills £10 per tonne to accept paper waste.
67-69	PFI references	References to London PFI credits	London Councils points to recent Comprehensive Spending Review announcements impacting London's waste PFI support.

Contact: Wayne Hubbard
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Our Reference:
Date: 13 January 2011

Dear Boris

LWARB Response to the Mayor's Draft Municipal Waste Management Strategy and Draft Business Waste Strategy

This letter and the attached detailed schedule are the London Waste and Recycling Board's (LWARB) response to the public consultation on your Draft Municipal Waste Management Strategy and Draft Business Waste Strategy.

LWARB is supportive of the aims and objectives of your Strategies, and in particular the use of a CO_2 outcomes based approach to waste management rather than rigid target setting. In our response, we have restricted our comments to the policies and proposals that affect LWARB.

However, I would like to point out that we have estimated that the policies and proposals in your Draft Municipal Waste Management Strategy will require around £200,000 in additional resources per year, plus a similar amount of programme budget to support this work. This is against a background of our current government funding being reduced by 18% and continuing uncertainty over LWARB's 2011-15 settlement. In addition, we expect to be adversely affected by the reduced funding to and abolition of the LDA. It is now very uncertain that the outstanding £15m of the LDA's £24m funding commitment to LWARB for 2008-13 will be available. We would therefore ask you to continue to support LWARB in its efforts to secure additional funding.

Additionally, whilst we welcome the opportunity to lead in helping London's Waste Authorities deliver efficiency savings, individual boroughs should be able to decide to opt in to any arrangements and it should be up to them to control and monitor such arrangements locally.

Finally, the London Waste and Recycling Board has made great progress in contributing to the proposals set out in your draft strategies. For example, LWARB has:

- identified a pool of fifteen waste infrastructure projects that are suitable for funding and that provide and total of around 2 million tonnes of additional annual landfill diversion capacity to London;
- updated and improved Capital Waste Facts - ensuring that valuable waste management information is available to professionals and the public alike;
- produced an interactive map of industrial sites in London together with opportunity and constraints, to make land identification easier for waste infrastructure developers;
- introduced an online brokerage service that can bring players together to create new projects;

- developed a £5 million fund to improve recycling from flats, with the first round helping to recycle an additional 41,000 tonnes of waste over four years;
- funded the creation of the worlds largest waste reuse network;
- funded the Recycle for London campaign.

Yours sincerely



James Cleverly AM
Chair of the London Waste and Recycling Board

Enc. LWARB Response to the Mayor's Draft Municipal Waste Management Strategy and Mayor's Draft Business Waste Strategy – January 2011

LWARB Response to the Mayor's Draft Municipal Waste Management Strategy – March 2010

London Waste and Recycling Board
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London Waste and Recycling Board response to the Mayor of London's Draft Municipal Waste Strategy and Draft Business Waste Strategy

January 2011

LWARB Response to the Mayor's Draft Municipal Waste Strategy

Proposal Ref	Proposal Text	Estimated Additional Resource @ £70k per fte	LWARB Officer Comment
Proposal 1.2	**Supporting London wide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling**		
	The Mayor will work with WRAP (Waste Resources Action Programme), London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications		Support - Delivered through Recycle for London funding agreement

	programme for the three year period 2010-2013.		
	The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme.		Support - Delivered through Recycle for London funding agreement
	The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats).		Support - Delivered through Recycle for London funding agreement
	The London Waste and Recycling Board has allocated funds to develop a London wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource		Support - Delivered through Recycle for London funding agreement

	Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.		
Proposal 1.3	**Reducing the amount of municipal waste entering the waste stream**		
	The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.	**0.3**	**NEW REQUIREMENT (i.e not work identified in LWARB's current Business Plan – Tentatively support but no resources identified for this requirement or any further detail in the Draft Strategy**
Proposal 3.1	**The Mayor will, through the London Waste and Recycling Board…Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London**	**1**	**NEW REQUIREMENT – Support - Requirement to develop a four year programme (2011- 2015) to deliver "significant savings in waste management operations in**

	Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.		London" Board's business plan to provide information on this programme, its kpis and the services it will offer.
Proposal 3.2	The Mayor will, through the London Waste and Recycling Board… Establish a framework of waste collection contracts from which waste collection authorities can draw down services.	0.3	NEW REQUIREMENT – Qualified Support - Currently working with IESE to develop contract framework and have support of LEDNET – However LWARB should have no role in monitoring contract performance as this is a local issue.
Proposal 3.3.	The Mayor will, through the London Waste and Recycling Board… Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use	0.3	New Requirement - Support - These may already exist through CIWM / IESE / govt or ICE – sign posting through website might be the best way to achieve this.
Proposal 3.4	The Mayor will, through the London Waste and Recycling Board… Seek to		Tentatively support - Activity will need to be tailored to available

	provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling[1] and closed loop recycling		funding
Proposal 3.5	**The Mayor will, through the London Waste and Recycling Board… Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.**	**0.5**	**NEW REQUIREMENT - Not sure what this work stream will look like. Type of help not specified. Seek assurance from Mayor that this relates to financial support only.**
Proposal 4.2	**The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will work with waste authorities to develop cost effective and easily accessible recycling and composting services to all London**	**0.3**	**NEW REQUIREMENT – SUPPORT.**

	households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.		
Proposal 4.3	The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.		Qualified Support – assurance is sought from the Mayor that this proposal refers to financial support for collection / recycling infrastructure.
Proposal 4.4	The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.		There is no special criteria in the flats programme that applies to social housing
Proposal 4.8	The Mayor, through the London Waste and Recycling Board's best practice		Done

	coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.		
Proposal 5.1	The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure**:**		
	The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.		Support – Delivered through the Infrastructure Fund, Flats Recycling Fund and Recycle For London
	The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other		Support – Development of brokerage ongoing – with a view to launch event in new year (for all online support tools)

	funding schemes, such as EU match funding.		
	The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.		Ongoing - need to secure capital funding form Defra and existing funding from LDA
Proposal 5. 2	The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:		Support – Delivered through the Infrastructure Fund
	The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.		Support – Delivered through the Infrastructure Fund
	The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible		Support – Delivered through the Infrastructure Fund

	from London's organic waste and non recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.		
Proposal 5. 3	The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:		
	The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and		Support – Delivered through new programme once GIS Map agreed

	www.londonbrownfieldsites.org.		
Total Additional Resources Required		2.7 ftes circa £190k per year	

Note: £70k per fte includes the GLA service charge of £20k per person per desk

LWARB Response to the Mayor's Draft Business Waste Strategy

Proposal Ref	Proposal Text	LWARB Officer Comment
Action 2.1.1	The Mayor will support development of tools that help businesses to find and to access business waste re-use and recycling services. This will also help organisations, such as the third sector, to increase their service exposure to businesses. LWARB, for example, will develop a London wide web portal to provide simplified access to re-use options for both consumers and SMEs. This will follow work with the London Community Resource Network (LCRN) and London boroughs to develop shared collection, storage and distribution facilities that can be accessed by all types of re-use project across London. This solution will be funded and operational by 31 March 2012.	The London Reuse Network has been funded by LWARB and is setting up the structure and processes to allow it to develop clusters of Reuse organisations across London. The London Reuse Portal will be developed and launched during 2011
Action 3.2.2	LWARB will offer a brokerage and project	Support – This Action forms part of LWARB's

	development service that aims to bring together waste producers, site owners, London boroughs and energy users to provide new sites for waste treatment infrastructure. It will provide expertise, funds and contacts to help develop waste projects to meet its priorities for improving waste treatment infrastructure in London. LWARB will seek to develop project partnerships across five principal project component parts: site operator, feedstock provider, technology supplier, off-take users (for heat, power, recyclate or fuel) and finance provision. LWARB will utilise two approaches to achieve this objective: • Passive Approach: LWARB will provide a range of tools and services, and provide access to potential project partners, through a web-based system on which potential project partners will be able to register an interest. • Strategic Approach: LWARB will take a pro-active approach in identifying potential project	Business Plan

	partners to help fill specific capacity gaps that the market has failed to deliver.	
Action 3.3.2:	As part of its remit to act as a best practice co-ordinator, LWARB will signpost potential investors and other partners to relevant knowledge and data sources to help improve investor understanding around waste treatment technologies and the level of risk associated with using new advanced thermal treatment technologies, particularly gasification and pyrolysis. LWARB will also help to identify and bring together the existing strengths, skills, knowledge and experience necessary to effectively bring new waste infrastructure to market with the minimum level of risk.	This Action will be achieved through LWARB's suite of web based tools (GIS, brokerage, capital waste facts).
Action 3.4.1:	The GLA and LWARB are working together to identify the potential capacity gap between municipal and C&I waste infrastructure	Support

	required in London and known projects under development. It is estimated that there may be a shortfall in waste infrastructure capacity for C&I waste of around 3.7 million tonnes in 2015 rising to 4.1 million tonnes in 2020 and 6.7 million tonnes in 2031 if no new infrastructure is developed within this time period. Table 6 provides a breakdown of the estimated level of capacity required for different types of C&I waste infrastructure. This is based on projected C&I waste arisings for each of the years 2015, 2020 and 2030, and projected existing and planned capacity. This strategic gap analysis study will be further informed by the DEFRA-led national C&I waste survey, to which LWARB has committed further funding to provide additional and more detailed information for London. The results of this study are due to be published late in 2010 and	

	updated C&I waste infrastructure capacity gap figures will be provided in the final draft of this strategy	
Action 4.3.1:	Help to maximise the reuse and recycling potential of CDE waste through supporting investment in CDE waste infrastructure and raising the profile of London's existing performance levels. A proportion of the funding available from LWARB Fund by the GLA Group, will be used to support the development of facilities for CDE waste. This may also include an assessment of the feasibility of developing a trading hub for re-used and recycled materials within London, thus providing strategic coordination between new sources of supply and reprocessing.	LWARB's business plan currently only supports the use of wood from the CDE sector for reuse or as a fuel. LWARB has no current commitment to fund CDE based work beyond that already done through the funding of the London Reuse Network and Bioregional's ReIY project.

Transport for London

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14 January 2011

Dear Boris,

TfL's response to the public consultation drafts Mayor's Draft Business Waste Strategy and Mayor's Draft Municipal Waste Management Strategy

Thank you for the opportunity to respond to the above consultations. I attach some detailed comments which I hope you will find helpful.

We strongly support the Mayor's vision for waste management and the policies in the two strategies.

Specifically, we would fully endorse the Business Waste Strategy's targets for reduction of Commercial and Industrial (C&I) and Construction, Demolition and Excavation (CDE) waste. We are working to ensure that TfL's own organisation-wide targets will meet, if not exceed, the strategy requirements.

We support the principles of waste prevention and minimisation advocated in both strategies as this reduces the amount of waste transported and environmental impacts. Further, we welcome the promotion of transportation of waste by rail and water as advocated by the Mayor's Transport Strategy (MTS).

TfL has a key role to play in helping to implement these strategies and we look forward to supporting the GLA and other partners to do so. Michele Dix and her team will be happy to assist further if that would be helpful.

Yours sincerely

Peter Hendy

TfL's Response to the Mayor's Draft Vision for London's Waste and the Draft Business Waste Strategy – Public Consultation

Introduction

TfL supports the targets for reduction of Commercial and Industrial (C&I) and Construction, Demolition and Excavation (CDE) waste. TfL is working to ensure its own organisation-wide targets will meet, if not exceed, the Strategy requirements.

It is suggested that the planned reuse and recycling of most of Crossrail's waste should be mentioned to show effective management of its CDE waste (pages 32, 33, 101). Also, it is advised to use only Crossrail's tonnage waste figure (page 33). If the volume figure is used, please change "7.3" to "approximately 7 million cubic metres". Further, the Crossrail web reference (page 36) requires updating.

Chapter 2: proposed policies and proposals

Policy 1 – promoting the financial and commercial value of a resource-efficient business

Environmental benefits

TfL supports the principles of waste prevention and minimisation as this reduces the amount of waste transported (and reduces environmental impacts).

Action 1.2.1 Stimulating Demand for Re-used and Recycled Materials through the Mayor's Green Procurement Code

TfL is a signatory to the Mayor's Green Procurement Code which helps organisations reduce their environmental impact through responsible purchasing. For the second year running, TfL achieved the highest status (gold) for its activities in this area. The Strategy could include examples where the GLA and TfL have stimulated demand for re-used and recycled materials.

Policy 2 – Boosting re-use, recycling and composting participation in the commercial and industrial sector

Action 2.3.2 The Mayor will seek to work with sector organisations such as the British Institute of Facilities Management, large estate owners and managing agents and transport organisations including Transport for London and Network Rail, in relation to the possibility of using spaces (such as disused railway arches) to house small-scale waste treatment options such as balers, shredders and in-vessel composting units.

This draft proposal unfortunately conflicts with TfL's agreed strategy in respect of its surplus landholdings. These have been identified as being sold in the open market under a remit to maximise their value so that the funds so raised can be reinvested

in London's public transport network which already faces funding challenges. TfL will work with GLA to review this proposal.

Policy 3 – Supporting the waste infrastructure market in London to grow and deliver for business

It is suggested that TfL's Freight Operator Recognition Scheme (FORS) should be included in the text introducing Policy 3. FORS can reduce the operational impact of the waste sector upon the environment – further information is available on our website: http://www.tfl.gov.uk/microsites/fors/

Tackling Climate Change

The Strategy should mention the role of the Environment Agency's 'Waste and Resources Assessment Tool for the Environment' (WRATE). This software tool assesses the environmental impact of waste management systems and could be used as a decision making aid or as the basis of a common modelling approach. It is noted WRATE is included in the Strategy's abbreviations section.

In addition to acting to reduce greenhouse gas emissions, the Strategy should reference the potential for reducing air pollution through effective waste management. The Mayor's Transport Strategy (MTS) outlines how the Mayor aims to reduce pollution in London by reducing the emissions produced by GLA and borough vehicles through new vehicle technologies and driver training.

Action 3.2.1 The Mayor will use the Food Waste to Fuel Alliance Programme to take a sector specific approach to the development of at least five exemplar food waste treatment infrastructure projects in London, including the development of at least one exemplar anaerobic digestion facility in London by 2012.

The Alliance will look to deliver food waste treatment infrastructure projects with one or more of the following objectives: • Provision of renewable transport fuel (biofuel and electric vehicles).

TfL's has produced an Alternative Fuels Strategy examining which fuels are most appropriate for non-rail transport in terms of practicality, readiness, cost and environmental benefit. Although TfL is a member of the Food to Fuel Alliance, its analysis shows a significant proportion of TfL support fleet vehicles may not be suitable for using biofuel or replaced by electric vehicles.

Action 3.6.1 Examine the opportunities for transporting waste by rail or water. Transport for London is conducting research on the feasibility of opening up the rail and navigable water network for the transportation of waste, to allow the waste sector to reduce its vehicle mileage and associated economic, environmental and social impacts (e.g. emissions, air quality, health impacts, noise, dust etc).

TfL supports the examination of the opportunities for transporting waste by rail or water. This action supports the MTS (see the policies and proposals listed below) and cross-referencing to MTS would strengthen this section.

- Policy 2 (freight operators to reduce CO_2)
- Policy 4 (greater use of the Thames for freight)
- Proposal 2 (support new rail freight terminals)
- Proposal 38 (ensure safeguarded wharves are fully utilised)
- Freight spotlight pg 261

Examples could be given of the TfL research mentioned in Action 3.6.1. Recent research projects with businesses include multi-modal refuse collection vehicles and the West London Canal Study. Subject to resource availability TfL can advise businesses on exploring opportunities for transporting waste by rail and water.

Delivery Service Plans should be mentioned in addition to the existing references to the costs of collections, integrated waste facilities, shared services etc. There is potential to refer to the Chambers Wharf case study.
http://www.cantillon.co.uk/New%20PDFs/Demolition/Chambers%20Wharf.pdf

TfL supports Action 3.6.2 regarding identifying and safeguarding wharves with an existing or future potential for waste management.

Policy 4: Drive improvements in resource efficiency in the construction and demolition sector whilst continuing to maintain good levels of re-use and recycling performance already being achieved

Construction consolidation centres are mentioned (page 100) but it is suggested that their role in reducing trips should be given greater emphasis.

Chapter 3 Leading by Example

TfL welcomes this chapter promoting the GLA Group's work in managing waste and would like to provide GLA with more examples of good practice to include in the strategy and text to demonstrate how TfL is working to achieve the Mayor's waste targets.

It is suggested that the Crossrail case study text be revised as follows (amended text given in italics):

"Crossrail *intends to* use material excavated during construction works to create a large *new RSPB* wildlife reserve at Wallasea Island, eight miles north of Southend-on-Sea in Essex. Clay, chalk, sand and gravel will be transferred by ship to the Island. *The excavated material will then be beneficially reused to help* create 1,500 acres (nearly 2.5 square miles) of *predominately* tidal wildlife habitat. It will form one of the largest new *intertidal* wetland nature reserves in Europe for some 50 years and is expected to support a wide range of waterfowl, saltwater fish and plant species. Development of Wallasea Island, expected to start in 2011 will be *one of* the most important coastal habitat creation schemes *ever undertaken* in the UK".

Mayor's Draft Municipal Waste Management Strategy – Public Consultation Draft

Introduction

TfL supports the draft municipal waste strategy and the Mayor's vision for London's waste management. The MTS compliments the Draft Strategy in its goal to improve the quality of life for Londoners, and it would be useful if more cross-references to the MTS were included to illustrate this point.

The Strategy should outline how progress towards the targets will be monitored and reported.

Policy 1: Inform producers and consumers of the value of reducing, reusing, and recycling.

TfL supports the intention to reduce the quantity of waste produced per household, as this will reduce the transport impacts of waste management infrastructure. In turn, it will reduce carbon emissions, air pollutant emissions, congestion and noise.

Policy 2: Setting a CO_2eq standard for municipal waste management activities to reduce their impact on climate change.

Policy 2.6 – The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TfL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

TfL supports this policy and it is supported by the MTS. One of the key goals of the MTS is to reduce transport's contribution to climate change and improve its resilience. This includes freight delivery, as outlined in Proposal 99 of the MTS.

Policy 3: Capture the economic benefits of municipal waste management

TfL strongly supports the need to maximise the economic benefits to London of waste management. This dimension is crucial in the prevailing economic conditions.

Policy 4: Achieving high municipal waste recycling and composting rates.

Proposal 4.7 - The Mayor will work with waste authorities, TfL and the private sector to provide 'on-the-go' recycling bins across London.

London's boroughs have more influence and control over the 'on the go recycling' than TfL. Litter management on TfL property is often limited by security and operational (safety, customer movement, etc.) issues. TfL will contribute to 'on the go recycling' where possible, but it can be difficult to facilitate separate collection of

different waste streams for recycling in some environments, e.g. Tube stations. As a result, most of TfL's recycling is done by the organisation. This is delivering very effective recycling for London Underground (as described in the case study in the Draft Business Waste Strategy).

It is suggested that the last paragraph on page 120 be amended to read, 'A number of boroughs provide recycling bins on streets in strategic locations, such as outside bus and train stations and in town centres...'

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon.

TfL strongly supports the expansion contained in Proposal 5.1 to place greater focus on encouraging the transport of waste by rail and water. This is in support of MTS Proposal 99.

Proposal 5.4 – The Mayor through TfL, will encourage the movement of waste via sustainable modes of transport.

TfL supports Proposal 5.4 and this is supported by the MTS.

Policy 6: Achieving a high level of street cleanliness.

Proposal 6.10 – Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

The strategy refers separately to both London Underground and Transport for London, when a reference to Transport for London would suffice. Also, references to Railtrack should be removed as it no longer exists (Network Rail is the replacement for Railtrack). Proposal 6.10 should be amended with regard to this.

The reference to London Underground's litter recycling target should be amended to 70 per cent as this is the TfL target.

MURAD QURESHI AM

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14 January 2011

Boris Johnson
Mayor of London
City Hall
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RE: Response to the consultation on your draft Municipal Waste Management Strategy

I am writing to you on behalf of the London Assembly Labour Group in response to the consultation on your draft Municipal Waste Management Strategy

The following are our key comments on your strategy:

1. Strong on analysis weak on action and implementation
2. Laudable objectives but few commitments for action from the Mayor
3. Targets can be welcomed but no action identified to monitor achievement of those targets or ensure their delivery
4. No reference to the new Mayor powers from the 2007 act and how the Mayor might use them to support/deliver the ambitious objectives and targets in the strategy
5. Targets and objectives are specific; the action and implementation is woolly and generalised
6. There is a need for Mayoral leadership on this issue and a consistent London-wide approach
7. The strategy is weak overall on a London-wide approach to Food Waste
8. The Mayor needs to deliver against EU obligations on waste management and to keep on top of new European laws and directives

Further to these comments I outline our views and rationale in more detail.

1. Strong on analysis weak on action and implementation

There is an excellent analysis of the scale of the task for London in terms of reducing and reusing waste. The economic modelling of scenarios including a "do nothing" option is also very useful; demonstrating the increasing costs of managing the waste collection and disposal over time and demonstrating that investment will save money over time.

There is also a good analysis of the barriers to recycling; reuse and energy regeneration schemes.

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The strategy identifies good examples and case studies including for example a successful promotional campaign by Wandsworth; and estate-based composting schemes in Hackney.

However the strategy falls way short of proposals for action to invest in schemes; roll out good ideas from boroughs across London; or to meet the identified funding gap.

2. Laudable objectives but few commitments for action from the Mayor

From the analysis the strategy has drawn the following objectives:

" 1. Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.
2. Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
3. Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.
4. Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure."

It is difficult to argue with the objectives; they fit well with the analysis. However the strategy is weak on implementation and delivery. For example the strategy identifies an infrastructure investment requirement of £800-900 million of capital costs plus operating costs of £60-70 millions. The strategy is, however very light on how that investment will be identified – simply saying that it will "need to be met by a mixture of public and private investment"

3. Targets can be welcomed but no action identified to monitor achievement of those targets or deliver those targets

We welcome the targets identified in the strategy; like the objectives they fit well with the analysis. We should particularly welcome the new CO2eq emission performance standard. However like with the objectives there is nothing in the report identifying a London-wide approach to delivering against those targets. It is proposed that targets are monitored and published in an annual report by the London Waste and Recycling Board. What will the Mayor or the Board do if those targets are not met?

4. No reference to the Mayor's powers and how the Mayor might use them to support/deliver the ambitious objectives and targets in the strategy

The 2007 GLA act gave the Mayor new powers to deliver his waste strategy. There is no evidence that the Mayor has used these powers. There is no reference in the strategy of the availability of these powers and their potential for utilisation to deliver the strategies ambitious objectives and targets.

The Mayor needs to show leadership on waste management across London and needs to demonstrate that he is willing and able to use his powers to deliver the waste strategy.

5. There is a need for Mayoral leadership on this issue and a consistent London-wide approach

The Mayor appears to be tentative in his approach to a London-wide waste management strategy; preferring to "support" borough initiatives rather than add value to borough initiatives with some London-wide action

The Environment Committee's scrutiny report on Waste to Energy Scheme identified a number of co-ordinating roles for the Mayor in particular:

a) Developing a public communications strategy to promote waste to energy schemes to the public including a health impact analysis. Boroughs would be supported by a London-wide publicity campaign where schemes may be seen as controversial at a local level.
b) The London Waste and Recycling Board should collate information on local borough and other contracts and provide central advice
c) The Mayor should make greater use of his powers.

6. The strategy is weak overall on a London-wide approach to Food Waste

We recognise and value the important role that Borough's have in the collection and disposal of food waste.

However we do feel it is essential for the Mayor to recognise that there is a need for a London-wide approach in the following ways:

- Mapping what London boroughs do to collect and dispose of food waste with the London Waste and Recycling Board having a key role as the holder of that information and knowledge.
- Supporting investment in technologies to improve disposal and reuse of food waste
- Identifying gaps in provision and the means to fill those gaps
- Using powers, in reserve, to ensure targets are met in all boroughs

Yours sincerely

Murad Qureshi AM
LONDON ASSEMBLY MEMBER

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Liberal Democrat Group

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Boris Johnson
Mayor of London
(Waste strategy response)

Our ref: MT/KR
Your ref:
Date: **14 January 2011**

via email to: viewsonwaste@london.gov.uk

Dear Boris,

The Draft Municipal Waste Management Strategy, October 2010

I welcome the opportunity to comment on the public consultation draft of your Municipal Waste Management Strategy. I am responding on behalf of my colleagues Dee Doocey and Caroline Pidgeon as the lead on Environment issues for the Liberal Democrat Assembly Members.

These comments are further to our detailed response on the previous draft (January 2010).[1] We welcome the increased level of detail in this draft and the extensive supporting documents, and the additions to the Strategy particularly around the development of a minimum lifecycle CO_2eq emissions performance standard (EPS), and initiatives such as the Flats Recycling Programme.

It is also welcome to see the inclusion in this draft of some of the initiatives we proposed in our previous response, including investigating a national deposit scheme for cans and bottles (p.122) and a commitment to work with the GLA group overall, and in particular with TfL to improve on-the-go recycling significantly on the GLA's own estate (p.121). I look forward to seeing these proposals put into practice.

However, the Strategy is still lacking in key strategic areas and should do more to set out how the Mayor will work to **reduce** waste, including food waste. The strategy acknowledges that waste reduction, or prevention is by far the most cost-effective and environmentally beneficial way to reduce the impact that waste has on the environment, and "prevention or reduction" sits at the top of the Mayor's waste management hierarchy. However the Strategy only proposes to support waste reduction "by supporting local and regional communications and initiatives" (p.77). We would like to see a far more detailed action plan to prioritise waste minimisation. This could include:

- **Incentives schemes** – the incentive schemes proposed in the Strategy to encourage recycling and composting should also look at incentivising reduction and reuse, otherwise they risk increasing the overall volume of waste. (policy 4.6 p.120)

- **Polluter pays principle** – the strategy should focus more on applying the polluter pays principle to dealing with waste (e.g. simplifying and reducing packaging). Instead

[1] http://www.glalibdems.org.uk/en/document/liberal-democrat-london-assembly-group-response-to-the-mayor-s-draft-municipal-waste-strategy.doc

it leaves many actions at the door of national government. [2] Whilst action does need to be taken nationally this should not stop London leading the way, particularly with a focus on the 2012 Olympics, in working with manufacturers and retailers to reduce waste.

- **Food waste –** the strategy largely only talks about food waste in the context of improving composting and the aim of the Mayor's Food to Fuel Alliance to catalyse at least five exemplar food waste projects in London. The strategy should go further than this and:
  - ⇒ Propose ending buy-one-get-one free offers on perishable goods. WRAP estimated in 2007 that the annual cost of *avoidable* household food waste is £10.2 billion nationally – largely as a result of 'overshopping'.
  - ⇒ Introduce a London-wide food waste minimisation campaign based on WRAP's "Love Food, Hate Waste" campaign.

  Although separate from the issue of waste reduction, the collection of food waste must also be improved and:
  - ⇒ The Mayor should set a date by when all boroughs should have introduced food waste collections.
  - ⇒ These collections should be linked to greater anaerobic digestion capacity.

We look forward to your response.

Yours sincerely,



Mike Tuffrey AM
Environment spokesperson, London Assembly Liberal Democrat Group

[2] "The Mayor wants London to lead the way in waste reduction but believes waste reduction actions need to be taken nationally as well, to be truly effective. The Mayor will write to the government proposing a set of measures that can be adopted to reduce waste generation and offering his assistance in promoting, trialling and enhancing these measures in London." (p.77).

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Boris Johnson
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(Mayor's draft MSW Strategy and Business Waste Strategy)
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ENVIRONMENT AGENCY

Date: 15 July 2011

Dear Mr. Johnson

MAYOR'S DRAFT BUSINESS WASTE AND MUNICIPAL WASTE MANAGEMENT STRATEGIES FOR LONDON

The Environment Agency welcomes the opportunity to comment on the Mayor's Business Waste Strategy for London and the Draft Municipal Waste Management Strategy consultations of October 2010.

We are particularly supportive of the development of the non-statutory business waste strategy as this forms the largest waste stream. We also support the vision for London to become a world leader in municipal waste management, minimise the impact on climate change and exploit the economic value.

We have no specific comments or proposed amendments to the policies. However, we would like to provide you with some information where we can work with the Mayor to help delivery.

Business Waste Strategy

Data
The recent survey of commercial and industrial waste carried out by Defra has shown a significant decrease in the estimated arisings. This equates to a reduction of around 36% from the 2003 survey and around a 25% reduction reported in this strategy and the London Plan.

The more detailed survey carried out in London will allow the data to be used to support local and London–wide waste management and land-use planning direction. The results will also provide information on the potential for further recovery of materials.

We would like to work with the Mayor and the London Waste and Recycling Board to carry out further analysis of this data and how it might impact London's future waste infrastructure. We are currently working on improved knowledge of permitted facilities.

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Legislation
The revised Waste Framework Directive imposes a legal obligation on waste producers and holders to take the waste hierarchy into account in managing and minimising waste. This will provide a useful hook to achieve many of the aims of the strategy. We will work with the Mayor, Boroughs and business groups to maximise the positive effects of this legislation in raising waste management up the hierarchy.

Sector and Waste Stream approach
It is noted that the Mayor will seek to deliver a sector approach to target areas where action and assistance is most required. We support this approach and believe it will compliment work we are doing on a waste stream approach. We are currently looking in particular at waste described as mixed waste which is the largest waste stream in London. This links with our work on Materials Recycling Facilities and quality outputs from recycling and we will be working with Boroughs and businesses in this respect.

Resource efficiency and construction
We support the drive for improvements in resource efficiency in the construction sector. We will work with the Mayor and Boroughs to deliver resource efficiency particularly through Site Waste Management Plans. The majority of large construction projects is from the public sector and this presents the Mayor with an easily accessible group to target and encourage them to commission sustainable construction.

Resource efficiency / waste prevention
We believe waste prevention and resource efficiency are key in achieving the aims of the strategy. We have developed a toolkit called READ (Resource Efficiency Appraisal and Development) which will help any organisation improve the way it uses resources. READ looks at the organisation's management approach and physical resource performance it then generates a score or profile and gives feedback and guidance. The toolkit can be used by small as well as large organisations. Any business or organisation that uses materials, water or energy and generates waste can benefit from using READ.

Further information on READ at http://www.environment-agency.gov.uk/business/topics/performance/110996.aspx

Draft Municipal Waste Strategy

Waste prevention
We are pleased to see that the strategy has a strong focus on waste prevention at the top of the waste hierarchy however this is a tough challenge and will require a significant change in public behaviour. We would like to work with the Mayor and others to develop monitoring protocols for waste prevention and the development of tools for measuring the “carbon saved “through waste prevention.

Greenhouse Gas Standard
We support the Mayor in setting a CO2 eq emission standard for the management of London’s municipal waste rather than specifying technologies. We will continue to work with the Mayor on the steering group to support future developments and provide technical advice for WRATE.

Infrastructure
We would be happy to work with the Mayor and the London Waste and Recycling Board to provide a better picture of current infrastructure and waste flows of municipal waste to enable better planning of infrastructure in the future. We have already mapped movements of municipal waste to landfill from London and we are considering further work on waste movements and flows through other disposal and treatment facilities.

Fly tipping
We note the Mayors intention to achieve a high level of street cleanliness. Whilst we support the working with Boroughs and London Councils to develop an online and mobile reporting tool similar to Lewisham's we believe that there is still a need for consistent reporting on Flycapture. We would welcome the opportunity to work with the Boroughs, London Councils and Defra on developing the use of Flycapture.

We hope our comments are useful and look forward to continuing to work with you. If you have any queries please do not hesitate to contact Keith Bates on 01189 535235 or at keith.bates@environment-agency.gov.uk.

Yours sincerely



P C Ackerley

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The Mayor's Draft Municipal Waste Management Strategy feedback form

The vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

The Mayor should work with the national Government to encourage:

1. The improved coordination of waste and energy policy to maximise energy from waste's potential contribution to the UK's energy needs.
2. Aligned responsibilities between waste disposal and collection authorities to ensure consistency of material delivered to treatment facilities.
3. Improved coordination of municipal and commercial waste infrastructure to optimise economies of scale in managing both municipal and commercial waste streams together.
4. A faster planning process to reduce timing uncertainty and associated contractual and funding issues.
5. Greater stimulation of domestic markets for recycled materials to enable recyclers to realise the greenhouse gas saving benefits from material recovery.

The objectives

The Mayor has identified the following objectives to help achieve his vision:

- To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

- To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.

- To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.

- To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

ESA supports the Mayor's objectives.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling.

Vision
Consumers understand and respond to the value of reducing, reusing and recycling municipal waste.

From vision to policy
The Mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste, with the aim of decreasing the amount of municipal waste produced.

From policy to action - proposals

Proposal 1.1 Setting waste reduction and reuse targets
- The Mayor will set a London-wide target to reduce household waste by 10 per cent per household, of 2008/09
levels, by 2020 and increasing to 20 per cent per household by 2031

- The Mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired
from 6,000 tonnes (0.15 per cent of municipal waste) each year in 2008 to 40,000 tonnes (one per cent) a year
in 2015 and 120,000 tonnes (three percent) a year in 2031.

Proposal 1.2 Supporting London-wide communications campaigns that promote municipal waste reduction, reuse and recycling

- The Mayor will work with WRAP, London boroughs and the London Community Resource Network to deliver Recycle for London as a communications programme encouraging waste reduction, reuse and recycling among both consumers and producers. The London Waste and Recycling Board has awarded funds to the Recycle for London communications programme for the three year period 2010-2013.

- The Mayor, through Recycle for London, will promote Zero Waste Places projects in London as a means to showcase best practice and encourage London boroughs to participate in the scheme

- The Mayor, through Recycle for London, will provide communications support to London boroughs that obtain funding from the London Waste and Recycling Board to improve recycling in flats (see Policy 4 for details of the programme to develop recycling in flats

- The London Waste and Recycling Board has allocated funds to develop a London-wide reuse network. The Mayor will work with London waste authorities, the London Waste and Recycling Board and the London Community Resource

- Network to develop the London Reuse Network, promoting waste reduction and reuse initiatives in the third sector, such as furniture reuse schemes, which can support and supplement existing local authority waste collection services.

Proposal 1.3 Reducing the amount of municipal waste entering the waste stream

- The Mayor will work with businesses to help them reduce waste and improve resource efficiency, using the Mayor's Green Procurement Code.

- The Mayor will identify leading businesses to work with the London Waste and Recycling Board as a network of mentors to small businesses wanting to improve resource efficiency and reduce waste.

- The Mayor will work with business to hold a packaging and product design competition aimed at "designing out" waste from the start.

Proposal 1.4 Tackling barriers to providing effective reuse services

- The Mayor will work with third sector organisations, the London Waste and Recycling Board and waste authorities to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services by:

a) providing funding through the London Waste and Recycling Board to develop a reuse network that would allow reuse organisations to work together to share resources and bid more effectively for local authority reuse and recycling services.
b) working with waste authorities to link their bulky waste services, where practicable, with local reuse services, when developing municipal waste contracts.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

The targets are ambitious and will only be achieved if accompanied by policies which incentivise waste reduction. This is less easy for municipal waste where the waste producer does not face the direct financial cost of the management of their wastes.

It should also be noted that the introduction of recycling services for multiple waste streams can help to highlight the importance of waste management within a household or organisation. This can in turn lead to behaviour change which not only leads to increased recycling but to increased waste minimisation as well.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

The Mayor should seek to encourage take back schemes. There may also be scope for municipal contracts to provide greater support for reuse activities. Some contracts currently fail to provide any incentives to encourage contractors to drive reuse.

It is important to make a distinction between households and commercial organisations when considering reuse. In the household sector there may be some opportunities to increase bulky waste collections and reuse networks. These will however be likely to be constrained by the scale of consumer demand for such services. The voluntary/third sector is well placed to support the private sector in delivering these services which may be of marginal benefit from an economic perspective.

While the voluntary sector has an important role to play in supporting the private sector, it is vital that service standards, and health and safety standards in particular, must not be compromised when engaging the voluntary sector. Third sector organisations must be subject to the same regulatory standards as the private sector.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

This is a role which was previously meant to be provided by Envirowise, which has now been subsumed into WRAP. WRAP should be able to provide expert advice to small businesses; the challenge would be making small businesses aware of this resource. It should also be noted that SMEs are unlikely to be able to find the time to implement resource efficiency measures without being provided with some form of financial incentive.

6. Any further comments on this policy?

No further comment.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Vision
The way London's municipal waste is managed can and should deliver the greatest possible CO2eq savings, by reducing waste and increasing reuse, recycling and composting more, and generating low carbon energy.

From vision to policy

The Mayor will set a minimum lifecycle CO2eq emissions performance standard (EPS) for the management of London's municipal waste. This EPS will inform the way waste authorities perform their role in managing municipal waste, as they will need to make sure the collection, treatment, energy recovery and final disposal of municipal waste collectively meets the EPS, or demonstrate that they have steps in place to meet it in the near future.

In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's non-recycled (residual) municipal waste, such that energy is generated in a way that is no more polluting in carbon terms than the new base load energy generation it replaces. London waste authorities will need to make sure energy generated from their residual waste meets this minimum performance, or demonstrates that they have steps in place to meet it in the near future.

From policy to action:

Proposal 2.1 The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings.

Proposal 2.2 Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost. London's performance against the EPS will be monitored and reported annually.

Proposal 2.3 In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. This minimum CO2eq performance will ensure energy generated from this waste will be less polluting than the new base load energy generation it replaced

Proposal 2.4 The Mayor will work with the Environment Agency to develop a web-based "ready reckoner" tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.

Proposal 2.5 The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS will not have any significant adverse impacts on other environmental considerations, such as air quality and biodiversity.

Proposal 2.6 The Mayor, through Transport for London (TfL), will work with waste authorities to maximise cost efficiencies and reduce the environmental impact of transporting municipal waste. The Mayor will encourage waste authorities to join TFL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

A life cycle approach to managing waste would rightly focus on one of the principal objectives of waste management, which is to minimise its impacts on the environment. It is however hugely complicated to estimate accurately life cycle emissions performance for waste management systems. For example, when considering the emissions performance of a residual waste facility, it is also necessary to consider the emissions related to pre-processing activities which also take place, as well as transport and other emissions.

ESA and its Members have persistent concerns about the practical use of WRATE which can lead to perverse outcomes if applied inappropriately and with incorrect assumptions. It is important that any CO2 equivalent approach to managing waste is completely transparent and consistent.

Waste management solutions tend to be bespoke and are determined by local factors. It would be extremely difficult to develop a generic tool that would be able accurately to determine the environmental performance of alternative technology options.

It should also be stressed that there should be no discrimination between technology options, which should be treated fairly and consistently, unhindered by policy makers' prejudice.

8. Any further comments on this policy?

No further comment.

Policy 3: Capture the economic benefits of municipal waste management

Vision

The approach to managing London's municipal waste changes from 'a problem to be disposed of' to 'an opportunity to be exploited'.

From vision to policy

The Mayor will work with waste authorities and third sector organisations to ensure that London is taking steps to maximise the economic benefits to London from its waste management.

From policy to action

The Mayor, through the London Waste and Recycling Board, will:

Proposal 3.1 Identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale

Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.

Proposal 3.3 Work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use

Proposal 3.4 Seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.

Proposal 3.5 Help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

ESA generally supports the principle of establishing formalised Joint Waste Authorities (JWAs), provided that both funders and contractors can be confident that the financing arrangements are robust.

It is important to note the distinction between joint arrangements based upon two or more disposal authorities working together and those where collection authorities are also involved. The interface between collection and disposal is critical for the successful implementation of joint working and the introduction of any proposals should ensure that WCAs are not able to undermine arrangements with WDAs or withdraw from agreements, for example following a change in political control of an authority.

A considerable concern for operators dealing with a JWA would be its financial security and potential revenue raising abilities. The introduction of statutory levies would be welcome but would need to be guaranteed. The issue of funding shortfalls at one or more of the constituent authorities would need to be addressed to give confidence to funders and contractors. Without demonstrable financial robustness, the bankability of JWA contracts would be open to question. JWAs should be fully financially underwritten by their constituent Members.

Another issue of paramount importance surrounds the governance arrangements for the proposed JWAs. It is essential that a JWA's constituent Members should not be able to delay the body's decision making procedures.

ESA and its Members have strong concerns about the practical implementation and delivery of a framework for collection contracts. It is likely to prove extremely challenging to develop a framework specification, which is sufficiently diverse to capture the range of circumstances for the draw down contracts, without diluting the cost saving benefits of a framework agreement or leaving the agreement open to legal challenge.

It would also be vital to secure local authority buy-in to ensure that a framework agreement was effective.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

The private sector is best placed to use its specialised expertise to deliver and operate waste facilities. The best support from the Mayor would be in helping authorities to achieve the optimal balance between maximising risk transfer to the private sector and achieving affordable solutions which represent value for money to the public sector. The decision on the appropriate level of risk transfer should be left to the waste authority.

For example, different authorities might be willing to take on differing degrees of revenue risk associated with the revenues raised from recyclate or electricity sales. Revenue sharing mechanisms are a good way in which the public and private sectors can work in partnership and deliver value for money waste services. This should be encouraged in principle, but the exact nature of the mechanism agreed should appropriately be left to the authority to decide.

11. Any further comments on this policy?

No further comment.

Policy 4 - Achieving high municipal waste recycling and composting rates

Vision

Recycling or composting in London will be a straightforward part of Londoners' lives, to achieve high rates of municipal waste recycling and composting.

From vision to policy

The Mayor will work with London's waste authorities, the London Waste and Recycling Board, and the private sector, to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide incentive for households and businesses to utilise these services.

From policy to action

Proposal 4.1 The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031

Proposal 4.2 The Mayor, through the London Waste and Recycling Board's best-practice co-ordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services, achieving high rates of recycling and composting.

Proposal 4.3 The Mayor will work with waste authorities and the London Waste and Recycling Board to help waste authorities provide recycling and composting collections for small businesses, comparable with those services provided for households.

Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.

Proposal 4.5 The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres.

Proposal 4.6 The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost

Proposal 4.7 The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.

Proposal 4.8 The Mayor, through the London Waste and Recycling Board's best practice co-ordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.

Proposal 4.9 The Mayor will ask government to consider implementing a national deposit system for cans and bottles.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

ESA supports in principle the proposals put forward in the strategy to improve London's recycling and composting performance.

London is a hugely diverse region and different recycling systems will be appropriate for different parts of the capital. This should be recognised and authorities should remain responsible for deciding upon the recycling collection system which best matches their local requirements.

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

The proposed recycling targets are extremely challenging for London as a whole. It should be noted that the outer Boroughs will be required to reach recycling levels far in excess of 60% to offset the likely inability of inner-city Boroughs to be able to achieve the target. This could cause political complications if revenues are transferred from Boroughs with large levels of high-density housing stock to those with higher recycling performance.

14. What specific role do you think the Mayor has to play in improving recycling across London?

The Mayor should use his coordinating and facilitating role to ensure that each authority is able to deliver the recycling services which best suits its local needs.

15. Any further comments on this policy?

No further comment.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Vision

London manages the bulk of its municipal waste within the Greater London area by investing in appropriate waste infrastructure.

From vision to policy

The Mayor, through the London Waste and Recycling Board, will work with waste authorities, businesses and other stakeholders to develop municipal waste infrastructure in London.

From policy to action

Proposal 5. 1 The Mayor, through the London Waste and Recycling Board, will secure investment in London's waste infrastructure:

- The Mayor and the boroughs, through the board's funds, will provide financial assistance for facilities for the collection, treatment or disposal of waste produced in London.

- The Mayor and the boroughs, through the board's brokerage service, will seek to involve external partners who are able to make financial and in-kind investments to increase the value of the board's fund. This will be achieved through a number of mechanisms, including the formation of joint ventures, and participation in other funding schemes, such as EU match funding.

- The Mayor will work with the boroughs to demonstrate the case for continued funding for the board beyond 2012, when current funding is scheduled to cease.

Proposal 5. 2 The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies:

- The Mayor will, through the board, work with waste authorities and the private sector to develop new facilities and improve existing facilities for reuse, recycling, composting and renewable energy in London.

- The Mayor will work with the board, the GLA Group and waste authorities to generate as much energy as possible from London's organic waste and non-recyclable waste to achieve the greatest environmental benefits. This will be done through a combination of introducing new technologies and using London's existing incinerators to generate heat and power.

- The Mayor will, through the Mayor's Food to Fuel Alliance, aim to catalyse at least five exemplar food waste projects in London by 2012. The Food to Fuel Alliance will support food waste projects that generate renewable heat and power (including transport fuel), and compost material for local use.

- The Mayor will work with London's incinerator operators to look at making London's incinerators carbon neutral by using heat from the incineration process that is currently being wasted.

- The Mayor, through the GLA Group's Decentralised Energy Programme, has the opportunity to work with

Southwark, Lewisham, the SELCHP operator and other stakeholders to develop a heat infrastructure to supply affordable low-carbon heat to local housing estates and public and private sector buildings in Southwark and Lewisham.

Proposal 5. 3 The Mayor will work with waste authorities to manage as much of London's waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan:

- The Mayor, when reviewing municipal waste contracts and waste strategies, will work with waste authorities to intensify and re-orientate waste sites in their control, so that more of London's waste can be treated in London wherever possible. He will also consider all aspects of the development of new or planned sites, including good design, and the development of new technologies for energy recovery.

- The Mayor, through the London Waste and Recycling Board, will work with waste authorities, landowners and other stakeholders to develop a waste site framework, which would set out opportunities for developing new waste infrastructure, looking at the most suitable sites and surrounding land uses; and linking where appropriate to the GLA Group's heat map network and www.londonbrownfieldsites.org.

- The Mayor will hold an open dialogue with local authority leaders to identify where the opportunities are for developing waste infrastructure in London. The Mayor will also actively explore opportunities to use land owned by the GLA group for managing municipal waste.

5. 4 The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.

- The Mayor, through TFL, will promote sustainable forms of transport for waste, maximising the potential of rail and water transport.

- The Mayor, through TFL, will work with waste authorities to make better use of London's wharves and canals for developing the city's waste infrastructure.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

ESA supports this, in line with the proximity principle.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The principal barriers would be the ability to find available land for new infrastructure at reasonable cost and the ability to deliver new infrastructure through the planning system.

The Mayor should work with national government to find ways in which local communities can be incentivised to accept new waste infrastructure. This could be achieved through directing business rates raised from facilities back to local communities. An alternative would be to bring forward the negotiation of section 106 agreements such that local residents are able to see the benefits in advance of the planning decision being debated.

18. Any further comments on this policy?
No further comment.

Policy 6: Achieving a high level of street cleanliness

Vision
Londoners should enjoy a consistently high standard of street cleanliness regardless of where they are living, working or visiting in London.

From vision to policy
The Mayor will work with London boroughs, businesses and public transport providers to develop and implement a programme of work to make London a clean and pleasant city to live in and visit.

From policy to action

The Mayor will:
Proposal 6.1 Work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping

Proposal 6.2 Work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.

Proposal 6.3 Encourage boroughs to recycle or compost their street cleaning waste where practicable.

Proposal 6.4 Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.

Proposal 6.5 Work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, after the Olympic and Paralympic Games.

Proposal 6.6 Work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.

Proposal 6.7 Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting biodegradable gum in London

Proposal 6.8 Work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme

Proposal 6.9 Apply to the Chewing Gum Action Group for funding for a behaviour change communications programme on litter and chewing gum for London in the years leading up to 2012.

Proposal 6.10 Work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?
ESA supports measures to improve street cleanliness and reduce environmental crime.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?
ESA supports the proposals.

21. Any further comments on this policy?
No further comment.

About your organisation

22. Name
Jacob Hayler

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Environmental Services Association

---

24. Address
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25. Type of organisation
Private waste sector

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26. Approximately how many people does your organisation employ?
0-50

Thanks for taking part!

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Greater London Authority
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14th January 2011

Dear Sir

Response to 'London's Wasted Resource' consultation on The Mayor's Draft Business Waste Management Strategy and the Mayor's Draft Municipal Waste Strategy for London

As a privately owned waste management company operating the largest Materials Recycling Facility in London, we read the Mayor's Draft Municipal and Business Waste Strategies for London with interest. Our business operations reflect, and will help deliver, the Mayor's priority targets on reducing London's waste to landfill, improving London's self-sufficiency in managing its own waste within its own boundaries and boosting re-use, recycling and composting targets.

About Powerday

Powerday is a c.£30million turnover, waste management company with a 1.6 million tonne capacity facility in Willesden Junction and three satellite transfer stations around the Capital. Our construction and demolition (C&D) plant and mechanical treatment processes are designed in line with the Mayor's waste management hierarchy, allowing us to recycle as much as possible then producing a solid recovered fuel (SRF) from the remaining material. Our focus is on achieving 100% recovery as far as possible, providing businesses and organisations with a viable and cost effective alternative to landfill. Our recycling rates for C&D waste are typically in the region of 90 - 95% and for municipal black bag waste a range between 15 - 20%.

We have invested c.£22mm in our Willesden Junction facility over the past 6 years, including £2m in 2010 installing additional Pellenc optical sorting equipment to enable the recovery of more types of plastic. We will continue this investment to maximise efficiency and effectiveness of our assets and recovery rates achieved at this site.

Importantly from a London 'capacity' perspective, we are also in the process of submitting a planning application to build a facility in West Drayton (LB Hillingdon) to process a further 950,000 tonnes of London's business and municipal waste. The proposed development is well located and would serve an area of London producing c.4m tonnes of waste each year, 65-70% of which is currently disposed to landfill sites in shire counties outside of the Greater London area.

Powerday is a key advocate for multi-modal transport. Our Willesden Junction site sits on a 26 mile lock-free section of the Grand Union Canal and at a key railway junction, having its own sidings which are used on a daily basis. The proposed site in Hillingdon is similarly served by its own rail siding, the use of which is an essential element of our application.

Response to the Mayor's Draft Business Waste Strategy

Policy 1: Promoting the financial and commercial value of a resource-efficient business

Proposal 1.1: Supporting businesses to identify and implement waste prevention opportunities across the supply chain.

We support the Mayor's drive to improve resource-efficiency in businesses but believe that 'the measurement, assessment and disclosure of waste performance in the supply chain' will only be possible through partnership working between businesses and their waste management suppliers. We provide recycling reports to all our clients and these are key to those businesses minimising waste, not just by increasing recycling rates but through supply chain management:

"The use of waste data from Powerday is helping us identify and eliminate materials from the supply chain that aren't recyclable or are wasted unnecessarily. This aspect of supply chain management... will help determine whether zero waste to landfill is achievable."

Paul Elliot, Supply Chain Manager, Wates Group, September 2009

We believe there is a leadership role for the Mayor and the GLA in highlighting good practice to business through case studies demonstrating the potential for cost savings, in particular during 2011 as the landfill tax rises to £56 per tonne and will really begin to hit businesses hard.

Proposal 1.2: Supporting businesses to close the loop in London and drive the market for use of recovered resources.

We believe a stable and growing market for re-use and recycled materials and products is fundamental to boosting recycling and recovery rates in the Capital. We believe the Mayor should take a lead in stimulating this market through the GLA's purchasing practices, the Mayor of London's Green Procurement Code (of which Powerday is a signatory) and investment in re-manufacturing infrastructure.

The Mayor should put pressure on brands and market leading companies – beyond those exploiting the first mover advantage – to support the Capital's objective of becoming the greenest big city and really kick-start mass-market demand for recycled content products.

Proposal 1.3: Deliver London-wide campaigns and initiatives to promote the financial, commercial and environmental value of waste minimisation and resource efficiency to businesses and their employees.

We believe that the forthcoming landfill tax rise in April will be a tipping point for many businesses and this presents an ideal opportunity for the Mayor to launch a London-wide campaign to promote the financial, commercial and environmental benefits of resource-efficiency and, in particular, boost recycling whilst supporting London's growing green economy.

Policy 2: Boosting re-use, recycling and composting participation amongst commercial and industrial waste producers.

Proposal 2.1: Increasing access to re-use, recycling and composting services and supporting collaborative working to develop collective contracts and collection.

We agree that 'increasing access to re-use, recycling and composting services and collective contracting arrangements, particularly for small and medium businesses' will be key to improving re-use, recycling and composting rates in the Capital. We support collective bargaining by SMEs and have for example, partnered with Park Royal Partnership in recent years to provide the 'Park Royal Waste' scheme, giving small to medium businesses collective buying power and access to our services at prices normally reserved for businesses buying in volume. We also agree that London BIDs are ideally positioned to facilitate similar schemes for SMEs in their catchment area, particularly on large trading estates. We also see these types of schemes as key to reducing waste traffic movements in the Capital and achieving the Mayor's vision for a low carbon society.

We believe there are other advantages including the ability to move waste by alternative transport modes (ie by water and rail) through encouraging collective arrangements. This includes potential collaboration on major redevelopment and regeneration programmes e.g. Crossrail, Thames Tideway project, Olympic Park Transformation and Legacy Development possibly through planning agreements.

Proposal 2.4: Ensure that all new and refurbished developments have sufficient internal and external space available for storage of bulky waste, residual waste and recycling.
Whilst we agree with the importance of this proposal, we also seek acknowledgement of the role of MBT in increasing recycling and recovery rates for businesses where storage capacity remains a barrier to on-site segregation of materials for recycling.

Where space is at a premium such as in urban areas, consideration should be given to the creation of well designed, centrally located, accessible storage facilities integrated into the public realm and shared between various business users who might otherwise find it impossible to retrofit the required storage space within their refurbishment proposals.

Policy 3: Supporting the waste infrastructure market in London to grow and to deliver for businesses

Proposal 3.1: Securing new investment for waste infrastructure in London.

We believe the Mayor's assistance is vital to overcoming the challenges of developing new waste infrastructure in the Capital. Powerday is pleased that its application for funding from LWARB to support its plans for new MRF capacity in west London has been shortlisted in LWARB's pool of projects.. Timely release of funds is critical to the private sector being able to fulfil its role in bridging the capacity gap identified by the Mayor at 2015 and beyond.

This is especially important at a time where the landfill tax increase in April 2011 will hurt businesses and be seen as a very expensive, regressive tax that cannot be avoided. Without additional capacity, the MRF capacity currently available will become more expensive as gate fees track the increasing cost of landfill through severely restricted supply.

Proposal 3.5: Facilitate the delivery of waste infrastructure through the strategic planning process. We regard the Mayor's facilitation of 'the delivery of waste infrastructure through the strategic planning process as critical to the delivery of waste infrastructure in the Capital. The fine 'policy' words need to be translated into firm, deliverable outcomes and that the Mayor needs to work closely with the local boroughs to ensure there is sufficient understanding of the strategic need for new facilities.

Proposal 3.6 Integrating waste facilities into the urban environment.

We welcome the acknowledgement of the role of multi-modal transport in integrating waste facilities into the urban environment and seek the Mayor's support in making water and rail transport viable and cost effective transport options for waste in and out of sites with the appropriate infrastructure. If London is to deal with its own waste in the Capital, addressing transportation of waste will become increasingly fundamental to the Mayor's vision of a low carbon society. We would welcome a working group set up by the Mayor to facilitate stakeholder discussion around this matter, and see ourselves playing a key role in working with the Mayor to bring forward further investment in alternative transport methods through providing water and rail access to our existing Willesden facility and rail access at our proposed West Drayton facility.

Policy 4: Driving improvements in resource efficiency in the construction and demolition sector whilst continuing to maintain good levels of re-use and recycling performance already being achieved.

Proposal 4.1: Use policy and regulatory requirements to design out waste at source and drive resource efficiency improvements.

Powerday works with a large number of construction companies delivering recycling rates typically over 90% and driving improvements in resource efficiency. As noted in our comments on policy 1, we provide robust recycling reporting to our clients and this is helping them improve supply chain management. In 2010, we delivered our first Institute of Environmental Management & Assessment (IEMA) accredited Site Waste Management Plan training course. Whilst we agree that the Mayor should support improvements in the standards across the whole industry, we believe that more needs to be done to raise standards in the mid and lower ends of the C&D sector. The increase in landfill tax will assist in this and the sector should be targeted in any campaign run by the Mayor to raise awareness.

We also believe there are major opportunities to encourage non-road transport of waste and materials in this sector, in particular for major regeneration schemes and redevelopments. This can be encouraged through the planning process, via guidance issued to Boroughs.

Proposal 4.3 Support London's construction and demolition sector to maintain existing levels of re-use, recycling and composting.

As detailed in our notes under policy 3, Powerday welcomes the Mayor's support of our proposed investment in C&D (and MSW) waste infrastructure and hopes that encourages LWARB funds will ultimately be released to facilitate this.

Policy 2: Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

Proposal 2.1: The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management functions in a way that achieves the greatest possible CO2eq savings

We fully support the Mayor's acknowledgement of the role of MRF/MBT in boosting municipal recycling rates and producing SRF and believe that much more should be done by authorities to pre-treat residual waste. As mentioned earlier in our response, we have achieved recycling rates for municipal black bag waste (from high rise blocks and other sources in a number of London boroughs) typically in the range 15 -20%. We have also run trials on fly tip clean-up, street cleansing and bulky waste streams (for the London Borough of Islington) achieving recycling rates of between 35 and 40%.

Proposal 2.2: Using Defra's Waste and Resources Assessment Tool for the Environment, the Mayor will set a lifecycle CO2eq EPS for the treatment of London's municipal waste.

We support the setting of an emissions performance standard but believe the current proposed approach that excludes transport emissions is inaccurately and unfairly weighted towards source segregation (over Materials Reclamation Facilities). More importantly, it works against encouraging investment in, and use of, multi-modal transport, which presents huge environmental and social benefits in terms of emissions, congestion and disturbance. Moreover, excluding transport emissions does little to encourage boroughs and businesses to invest in cleaner fleets, including hybrid vehicles.

We urge the Mayor to reconsider, and consult further on, the proposal.

Policy 3: Capture the economic benefits of municipal waste management.

Proposal 3.3: The Mayor, through the board, will work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.

Powerday is flexible in its approach to Council/Local Authority contracts and is open to revenue-sharing agreements where authorities share the risks as well as the benefits associated with the processing of their waste. Procurement processes within the public sector should not be used as a barrier to innovation in provision of waste and recycling services. Local Authorities and Waste Authorities should, wherever a contractual provision allows, seek to extricate themselves from existing service arrangements which frustrate the real desire for improved recycling and diversion outputs and at the same time fail to deliver value for money solutions.

Policy 4: Achieving high municipal waste recycling and composting rates.

Proposal 4.2: The Mayor will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households and small businesses.

We welcome the findings of the GLA research in early 2010 recognising the role of pre-treatment of residual waste in flats. As outlined in our notes on policy 2, we have achieved significant recycling rates for municipal black bag waste from high rise blocks and other sources. However the proposal to introduce an EPS that excludes transport emissions needs to be considered further as noted above.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon

Proposal 5.2: The Mayor, through LWARB, will catalyse waste infrastructure in London, particularly those using low-carbon technologies.

As noted in our response to the Mayor's Draft Business Waste Strategy above and documented in the Mayor's Draft Municipal Waste Strategy, Powerday has been shortlisted in LWARB's pool of projects. We welcome our inclusion on this list and hope that LWARB funding will be released to help stimulate private sector investment into the development of much needed infrastructure in London.

We welcome the Mayor's assertion that 'Providing more waste treatment facilities through the Board, on a commercial basis, will mean that London's boroughs will be able to select waste treatment options from a market of facilities. This will reduce costs, and allow boroughs to enter into simpler and more flexible contractual arrangements.' We hope that authorities will be more willing to take a strategic approach and engage on alternative solutions rather than entering into very long term, restrictive contracts that are focused largely on securing the best price for landfill or energy recovery without pre-treatment.

Proposal 5.4: The Mayor, through TFL, will encourage the movement of waste via sustainable modes of transport.

We welcome the Mayor's promotion of the use of sustainable modes of transport for municipal waste. As noted in our response to the Mayor's Draft Business Waste Strategy, we would welcome a working group set up by the Mayor to facilitate stakeholder discussion on how to make the transportation of waste by rail and water viable and cost effective, and we believe we can play a leading role in supporting this initiative.

Policy 6: Achieving a high level of street cleanliness.

Proposal 6.3: The Mayor will encourage boroughs to recycle or compost their street cleaning waste where practical.

We support the Mayor in encouraging boroughs to recycle their street cleansing waste. As outlined in our note on policy 2, we have achieved recycling rates of over 40% for fly tip, street cleansing and bulky waste in the London Borough of Islington and believe such results will contribute significantly towards the Mayor's recycling targets for 45% by 2020 and 60% by 2031.

Proposal 6.4: The Mayor will work with a range of partners... to recycle waste from London events.

We would like to draw the Mayor's attention to the role of MBT in recycling waste from London's

events. Powerday provides recycling services to a large number of London events including RHS Chelsea Flower Show and venues such as Twickenham Rugby Club and Chelsea Football Club. Last year, Powerday helped the Royal Borough of Kensington & Chelsea increase its recycling rate at the Notting Hill Carnival from 5% in 2009 to 40% (with the remainder of the waste recovered as SRF).

We believe the Mayor should work with major events and venues to agree a performance standard and voluntary commitment to waste reduction, recycling and landfill diversion, which can be encouraged through licensing negotiations. Any awareness raising campaign run by the Mayor should target this sector, and we would be happy to provide case studies to demonstrate the potential through the major steps taken by Powerday's clients in recent years.

In conclusion, Powerday's view is that the Mayor's draft strategies are well thought through and set out an entirely logical and desirable vision for how waste as a 'resource' should be managed within the Greater London area. We would be happy to discuss our response with the GLA - please do not hesitate to contact us if you require any additional information or clarification on items within this response.

Yours sincerely

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Feedback on the Mayor's Draft Municipal Waste Management Strategy from InSinkErator

14 January 2011

InSinkErator is a leading manufacturer of kitchen sink appliances, including in-sink food waste disposers (FWDs). It is a division of Emerson Electric Co, a global technology and engineering company, which serves industrial, commercial and consumer markets. As a UK company drawing on over seventy years worldwide experience in the food waste disposal sector we take this opportunity to respond to those questions in the Mayor's draft strategy relating to the capture of London domestic food waste and the recovery of value from this waste stream.

As these are core issues for our industry, over the decades we have accumulated (and continue to build) a formidable evidence base of scientific knowledge in our field — peer reviewed research executed by academics and recognised experts around the world. In addition to these data, we count on the practical experience of our operations in over 80 countries, including many cities that face similar challenges to London and societies, such as Sweden, considered to be at the forefront of sound environmental management.

We are grateful for this opportunity to share the scientific knowledge and practical experience we have gained, as we firmly believe that any strategy for separate collections of household waste, in, London, should acknowledge the potentially crucial role of domestic food waste disposers (FWD) to capture and recover value from the food waste stream.

In-sink food waste disposers (FWDs) are a convenient and user friendly solution for householders, particularly those living in flatted properties and densely populated urban environments. They can grind practically all food waste to minute particles that are easily carried away by the wastewater system, directly to wastewater treatment where the majority of sludge is treated by anaerobic digestion (AD). Householders dispose of their food waste, immediately, at their kitchen sink.

RESPONSES TO THOSE QUESTIONS WITHIN OUR COMPETENCE.

The following numbers correspond to those on the feedback form.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

To achieve world leadership in municipal waste management it will be crucial to learn from best practice in other countries and accept sound scientific evidence to adopt proven, successful, innovation. FWDs present a robust body of peer reviewed sound science to support their efficiency, carbon impact and value recovery potential. InSinkErator welcomes the Mayor's ambition that options for waste management should enable participation by the maximum number of Londoners, especially flats, by being simple and convenient, as well as carbon efficient.

Promoting solely separate kerbside collection of food waste will diminish the opportunity for a more successful policy outcome. In flatted properties, high rise buildings and urban terraces, where houses open directly on to the street, many householders are unable or unwilling to participate in separate kerbside collection of food waste. While InSinkErator welcomes re-education to encourage environmentally diligent behaviour but to be successful, strategies must also address how people behave rather than how we might wish they would behave.

As witnessed at the recent year end 2010, when kerbside collections are disrupted food waste presents the biggest problem. Putrefying food waste smells and attracts vermin that attack receptacles, or bags, and litter the contents across streets. A hot summer will also result in odour from stored food waste. Where storage space is at a premium, removing the food waste stream is a wise and hygienic precaution. While additional kerbside collections congest residential streets with heavy goods vehicles, generate polluting emissions and increase fossil fuel consumption.

InSinkErator supports the view that consumers should be encouraged to reduce the need for disposing of unused food, just as they should be encouraged to reuse and recycle. However the production of waste is an inevitable consequence of most human activities and therefore it is important that policies allow it to be managed, so that its resource value can be recovered to the benefit of health and the environment. It is also important that the organic matter is conserved and nutrient cycles are completed by treating food wastes and using them safely to feed agricultural soils and crops.

To engage Londoners living in flatted properties in effective food waste separation and disposal, it is imperative that they have available the simplest, environmentally friendly option, of segregating maximum food waste at source, at their kitchen sink. Hence FWDs are a particularly useful waste management tool for those who cannot or will not consistently commit to separate collection. For example: the elderly, infirm, busy, forgetful, those who lack storage space, don't like the odour or are simply uninterested in the environment.

For London's highly mobile population varying collection schedules and separation regimes threaten successful compliance. FWD units have a lifespan of typically 12 years and provide continuity. The appliances remain installed in the kitchen if tenants or owners move on. Performance does not deteriorate with age, they die when bearings fail; they are themselves 95% recyclable.

Because food waste is dirty, wet and sticky it is a potential contaminant of other stored recyclables. Equally important, its dirty characteristics and smell generate strong adverse public sentiments. This can taint enthusiasm to separate other potentially valuable waste streams, that could be re-used or recycled if correctly channelled.

The addition of food waste to the wastewater system increases biogas production and enhances the nutrient content of organic fertiliser. By weight, AD is the most common method of treating sewage sludge. The fertiliser nutrients contained in the food waste are retained in the digestate, the majority of which (over 85%) is beneficially recycled as nutrient-rich soil improver.

2. Do you think these are the correct objectives, is there anything additional that the Mayor should be focusing on?

InSinkErator supports the objectives outlined, however the Mayor should consider that maximising use of existing infrastructure and avoiding the carbon impact of further construction is an important efficiency gain. Transporting food waste via the sewer system to existing waste water treatment works with their established anaerobic digestion plants eliminates the need for additional construction, as well as road transport. The majority (by weight) of London's sewage sludge is already treated by AD and that proportion is increasing.

There have been concerns that FWDs may cause sewer blockages or encourage the formation of FOG (fats, oils and grease). Research has consistently shown these fears to be unfounded. Currently FWD usage in the UK is just 6%. Even in countries and regions where use of FWD is as high as 50%,

there has been no change in the hydraulic loading of collection systems or increase in blockages. FWD are installed in 94% of households in Anaheim, California: it experiences no more sewer problems than cities that have a much lower percentage of installations. The same is true in Surahammar, Sweden, where installation of FWD started in 1997, and they are now used by 50% of households.

In Surahammar, benefits have proved to be both environmental and financial. The municipality has saved the cost of kerbside collection, transporting the waste to a treatment site and the cost of treating the food waste separately. It has found that no additional costs have been incurred in wastewater treatment over a 10 year period, the biogas has increased by 46% and the sewage system has recorded no increase in odour, blockages, or build up of fats, oils or grease. Overall Surahammar's waste strategy has decreased the tonnage of waste to landfill from 3600 tonnes in 1996 to 1400 tonnes in 2007. This research was published in December 2010 and copies of the paper can be provided[1].

A study on the impacts of FWD use in Herefordshire and Worcestershire quantified that for every one tonne of food waste diverted from landfill to WwTPs, beneficially capturing biogas for energy and re-using biosolids for land, almost one tonne of CO_2 equivalent emissions is avoided; attributing a negative carbon footprint or carbon credits to this method of food waste management.[2] Defra is quoting the same CO_2eq benefit.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

Policies for sustainable food waste management need to be adapted to the diversity of local situations and to people's behaviours and are therefore better developed at local authority level. Providing boroughs are helped to consider and implement a range of solutions, and crucially this "help" must include access to or powers to raise necessary funding, the Mayor's targets are certainly stretching, but they are achievable if the options include FWD.

Post-collection separation of dry-recyclables is a cost effective means of working towards a *zero waste economy* but the yield of reusable or recyclable materials is reduced/limited/compromised when wet, sticky, putrescible food waste contaminates other solids. FWD remove food waste at source, in the kitchen. When surveyed, users have consistently expressed high satisfaction rates (>90%) with FWD. FWD remove food waste from the waste stream. They grind the waste, they do not chop it, so plastic film, metal and other undesirable physical contaminants remain in the grind chamber. One solution will not fit all situations or individuals; some people will home-compost, some like wormeries, some like kitchen caddies, but a substantial number like none of these options and for them FWDs are an alternative.

6. Any further comments on this policy

With particular regard to improving recycling in flats (policy 4): communications programmes to multi-tenanted properties will help inform residents how and when they should dispose of their various waste streams, but if compliance is difficult or unpleasant their commitment will be short-lived.

It is sensible to admonish people not to buy more food than they need and to use up leftovers but some food waste in inevitable, especially if people are preparing meals from raw ingredients rather than using pre-prepared.

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[1] Evans, T.D.: Andersson, P.: Wievegg, A.: Carlsson, I. (2010) Surahammar – a case study of the impacts of installing food waste disposers in fifty percent of households. Water Environ. J. 241 309-319

[2] Evans, T. D. (2007) Environmental impact study of food waste disposers: a report for The County Surveyors' Society & Herefordshire Council and Worcestershire County Council, published by Worcestershire County Council.

Once installed FWDs remain in the property even when the tenant moves on. Whereas educating floating populations with regard to differing municipal collection regimes and timings can reduce capture at the kerbside. Where poor collection rates are observed this also results in additional and costly separation. In Germany the level of physical contaminants in kerbside bio-waste is reported to have increased from 4% to 20% as citizens' enthusiasm for diligent separation has declined.[3]

London's sewerage is a valuable heritage that conveys biodegradable waste to world-leading centralised treatment. Its limitation is hydraulic capacity. FWD do not add significantly to the hydraulic loading. An important part of the answer to hydraulic limitation is controlling rainwater on the surface, which has been recognised in the Mayor's Drain London and Greening London strategies. There is every reason for making the most of London's sewerage legacy. Most of London's wastewater treatment works continue to treat sludge by anaerobic digestion (AD) and to use the biogas to generate electricity, as they have for more than 80 years; the works in East London where AD was discontinued 20 years ago are reinstating it with state of the art AD.

7. What do you think about a CO_2equivalent approach to managing waste? What are the pros and cons and considerations that must be taken into account with this approach?

InSinkErator welcomes the fact that CO_2 targets will be set and the aim that transport and cost of energy generation be taken into account. InSinkErator would be glad to share its work on carbon foot printing food waste with the GLA and the Boroughs to assist this excellent initiative.

8. Any further comments on this policy?

InSinkErator welcomes this strategy, which it perceives is a clear rethinking of the approach to waste management, focusing as it does on the outcomes that should be achieved rather than the means of achieving them.

The strategy talks about "composting and recycling" but in many ways anaerobic digestion (AD) is more appropriate for food waste and has a better carbon footprint. Both produce soil improver, though digestate has more fertiliser replacement value than compost. AD produces renewable energy whereas composting uses energy. However new-build facilities for centralised composting or AD are expensive and difficult to locate. London's wastewater treatment works already have AD and biogas utilisation (or will have reinstated it soon) and a very successful programme for recycling digestate to land. It would make a lot of sense to use this existing infrastructure (the capacity of which could be doubled or trebled by thermal hydrolysis) to treat food waste, whether it is delivered via FWD and the sewers or via kerbside collection and trucks. Since FWD deliver food waste via the sewers, Ofwat considers it can be part of a water and sewerage company's (WaSCo) regulated business but that when it is delivered by trucks it is outside the remit of a WaSCo (but otherwise desirable) and that some new financial regulatory arrangement is necessary to accommodate it.

12. What do you see as the key barriers in working to ensure recycling and composting is **a straightforward part of Londoners' lives.**

All processes must be simple and convenient. If compliance is difficult or unpleasant Londoners' participation will be limited and commitment will decline. Separation and storage of different waste streams requires space which the majority of London homes lack. If the waste streams become mixed, or there is cross contamination, the cost of separation increases the carbon cost of processing and reduces their market value.

Waste management experts largely agree that it is also likely that those London inhabitants willing and able to recycle and compost are doing so already. Part of the challenge to achieving future

[3] Riedel, F. (2008) Turning contaminated waste into clean renewable energyand PAS110 compost – an overview of the inter-engineering biowaste process. Proc. 13th European Biosolids & Organic Resources Conference & Workshop. Aqua-Enviro, Wakefield

targets will be rolling out new programmes, but a crucial element will be engaging with the segment of London society that has resisted efforts to date, notably those in flatted properties. Brook Lyndhurst used the 2001 census data[4] and Defra's household waste statistics[5] to test the experience of waste managers that participation is poor in flatted properties. The correlation coefficient between the percentage of flatted properties (according to the 2001 census) and the NI192 the percentage of household waste sent for reuse, recycling or composting for all the London Boroughs and the City is -0.529 (Figure 1). This confirms the corelation between weak participation and the percentage of flatted properties, which are 49% of London's housing and 71% in inner London.

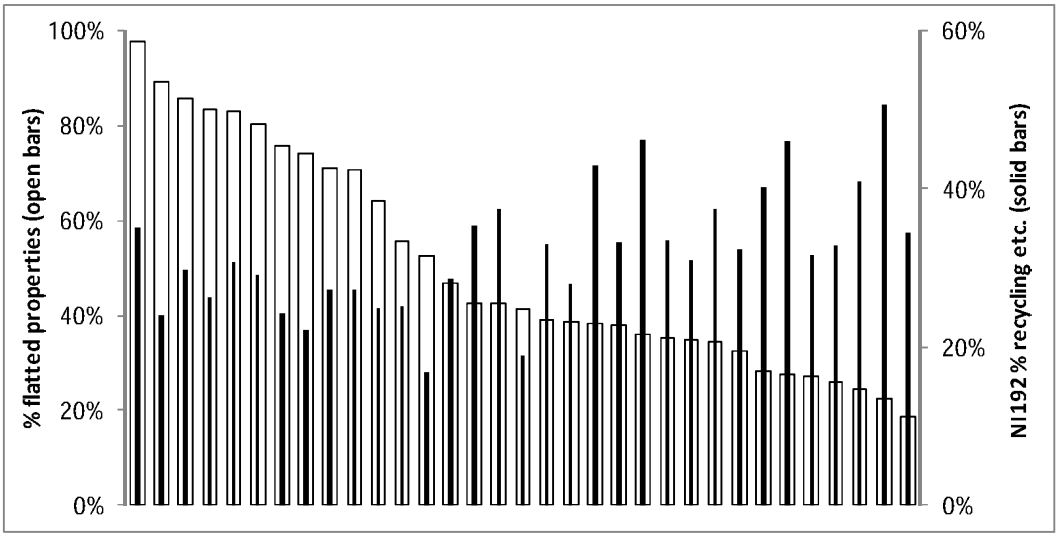


Figure 1 The percentage of flatted properties and the percentage recycling in London's Boroughs

As previously stated the key to successful policies for residents of flatted properties is ease; providing a method which makes it easier and more convenient to do the right thing, than chucking food waste in the residual waste bin or chute, which many choose to do at present. Food waste disposers represent one of the easiest ways for Londoners to process their food waste and send it for treatment and are currently only installed in a small percentage of households (6% nationally). FWDs obviate the need for kitchen caddies, food waste bins and chutes. There is a natural resistance to visit communal food chutes, bins or deposits, if these become malodorous or dirty, ill-illuminated or in any way threatening.

Food waste disposers are popular with users as witnessed in the Surahammar study previously quoted. It is the combination of favourable criteria - ease of use, efficiency, low carbon cost and value recapture – displayed by FWDs that has prompted cities previously reluctant to promote FWD, to adopt them now. New York and Stockholm are two such examples. Herefordshire and Worcestershire have promoted and subsidised FWD, as has Capri in Italy. In New Zealand FWDs are installed in 34% of households and Australia has 25% usage.

[4] Percentage of flatted properties ONS Table K16
http://www.statistics.gov.uk/StatBase/ssdataset.asp?vlnk=6574&Pos=6&ColRank=1&Rank=240

[5] Local authority municipal and household waste statistics 2009/10 Table 3
http://www.defra.gov.uk/evidence/statistics/environment/wastats/download/mwb200910a.xls

15. Any further comments on policy

By separating wet food waste FWDs also help with the management of solid waste; especially recovery of the dry fractions, improving recycling rates, reducing cost and increasing energy efficiency.

Concerns are often expressed about the electricity and water consumption of FWDs as well as potential blockages in sewerage systems, but research and field experience show these concerns are baseless. No research has been published that FWD increase water use significantly or that they increase sewer obstruction or blockage.

Domestic FWDs typically have a 350W – 500W motor. Field studies show usage averages 2.4 times per day for 16 seconds per use, this equates to an annual electricity consumption of about 2 – 3 kWh/household per year. At the current average UK electricity prices quoted by the Energy Saving Trust this equates to adding 25 – 37p per year to a household electricity bill. With regard to water consumption, the consensus from field studies is that the water usage associated with a FWD is of the order of one flush of a modern lavatory per day per household (6 litres).[6]

The electricity generation from the additional annual biogas is about 76 kWh_e/household, i.e. 25 times more than is used by the FWD. It should be remembered that this is baseload electricity independent of time of day or weather. Thermal electricity generation uses about 80 litres/kWh_e, the UK's average electricity generation emission factor is 0.541 $kgCO_2e/kWh_e$, thus the offset from the electricity from biogas is 6000 litres water and 41 $kgCO_2e/kWh_e$ – a net annual benefit of 3900 litres water and 40 $kgCO_2e$ per household.

Regarding potential blockages, food waste is 70% water and essentially has the same, or lower, specific gravity as human waste.[7] The standard design of sewers is therefore compatible with sediment-free transport of food waste particles. A study from the New York City Department of Environmental Protection concluded that the impact of FWDs on the sewer system was insignificant.[8]

16. Do you think London should be working towards a vision where it manages most of its waste within its boundaries?

InSinkErator agrees that the vision for London of managing its water within its own boundaries is laudable; it will be challenging but it is very desirable and consistent with the vision that London will be world-leading. Nutrient-rich soil improver will be used on farms outside London's boundaries but so too will the products from recovering dry recyclables.

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[6] Diggelmann, Dr C. And Dr Rovert K. Ham (1998) Life Cycle Comparison of Five Engineered Sustems for Managing Food Waste, Dept. of Civil & Environmental Engineering – University of Wisconsin. January.
Market Transformation Programme (2008) BNXS43: Food waste disposers – an overview

[7] Kegebein, J.; Hoffman, E. and Herman H. Hahn (2001) Co-Transport and Co-Reuse. An Alternative to Separate Bio-Waste Collection? Wasser-Abwasser GWF 142 (2001) Nr. 6 429-434

[8] New York City Department of Environmental Protection (1997) The Impact of Food waste disposers in Combined Areas of New York City, June.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The housing density and large proportion of flatted properties (the highest of any administrative area in England) are a challenge and it is therefore one that implementations will have to recognise and deal with. Heavy traffic levels, high land prices and lack of sites on which to build facilities are all consequences of London's size, success and density. It is therefore important to gain maximum benefit from existing infrastructure and for all of the "actors" to pull together to contribute to the solutions.

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VEOLIA
ENVIRONMENTAL SERVICES

Mayor's Municipal Waste Management
Strategy Consultation
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FREEPOST LON15799
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London SE1 2BR

14th January 2011

Dear Sir,

The Mayor's Consultation on Draft Municipal and Business Waste Strategies

Veolia Environmental Services is the UK's most substantial waste management company, delivering environmental services to more than 20 million people. Conscious of our social and environmental responsibilities, we promote the use of sustainable waste treatment methods to recover valuable raw materials to our 73,000 commercial and industrial customers, and 100 local authority partners.

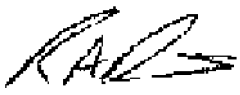
Globally Veolia Environmental Services employs over 80,000 people, and serves more than 45 million people across 35 countries. It is the only worldwide provider of a full range of services for handling solid and liquid waste, providing waste management and logistics services, as well as materials recovery and recycling. Veolia Environmental Services generated revenue of €9.2 billion in 2009.

Veolia Environmental Services supports the waste hierarchy and the objective of reducing landfill by increasing reuse, recycling and recovery, and is responsible for the contract that delivers the highest landfill diversion of any local authority in the UK (Hampshire).

Veolia Environmental Services welcomes the opportunity to comment on the **Mayor's Consultation on Draft Municipal and Business Waste Strategies**, and supports the Mayor's aims to make London self sufficient in the management of its waste, as outlined in the draft waste strategies. Our detailed views on these strategies are contained in the attached five page response, and we hope they are of value to the consultation process.

If you would like to discuss any of these matters further with a Veolia Environmental Services representative, please do not hesitate to contact me.

Yours faithfully,



Ray Parmenter CChem MRSC, MCIWM

Legislation Manager

Veolia Environmental Services (UK) Plc – Regulatory Affairs Department

The detailed response of Veolia ES (UK) Plc to Mayor's Consultation on Draft Municipal and Business Waste Strategies

London Mayor's Draft Municipal Waste Strategy

Veolia Environmental Services (UK) Plc is generally supportive of the Mayor's draft strategic aims to increase recycling and recovery, and to improve the efficiency of the collection and treatment of London's municipal waste. The policies and proposals outlined in the current draft Municipal Waste Strategy will help to make London more self-sufficient, in terms of resource and waste management.

However, before addressing the specific questions regarding the Mayor's Municipal Waste Strategy we have a number of questions of clarification, which are listed below as they do not easily fit within the response format:

- Page 9 The meanings of the terms "emissions" and "green house gas emissions" should be made clearer. Though the reference explains how methane is a more powerful greenhouse gas than CO_2, in terms of landfill, for instance, it does not explain whether this is just referring to fugitive emissions or includes emissions from power generation. If it includes power generation, does it take into account the fossil fuel emissions offset by the power generation? These questions also apply to Table 5 on page 92.
- Page 12 There is a target to achieve zero municipal waste direct to landfill by 2025. This is not consistent with the target for C&I waste, which is not explained. The use of "direct" is not consistent through the document (e.g. it is omitted on p15).
- Page 22 Can the use of landfill gas be used to meet Target 6?
- Page 42 (Figure 10) The conversion of waste to energy by what is perhaps inappropriately termed "incineration" and by landfill does not seem to be recognised.
- Page 48 (Figure 11) It says that the best GHG savings highlight the value of high recycling and composting rates. It is not clear if the GHG emissions from composting are taken into account. This exemplifies our comment in the attached response that any GHG/CO_2 accounting must be carried out on a consistent basis, when comparing alternative methodologies.
- Page 50 (Figure 12) Does the large proportion categorised as "pre-treatment" represent double counting as the output then goes for recycling or use as SRF?

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling

What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

As we said in our response to the last consultation, we believe that this target is very ambitious, given the potential population growth in London during the lifetime of the Strategy. We also said that we believe that the economic situation will have a significant bearing on this target, and that when prosperity returns the target will become more difficult to achieve. The setting of achievable targets can reinforce behaviour change, thereby allowing a more stretching target to be set in future. We recommend the Mayor considers this in establishing the targets for London.

What do you see as the key considerations for developing a successful London-wide reuse network?

The main barrier we feel is the ability of the reuse/ repair organisations to respond to technological and product change, and the risk of being adversely implicated by product liability that is inherent with product reuse/ repair - in particular safety issues. Another barrier is the competition reused/ repaired goods face from cheap imported goods.

Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

Jane Beasley of Beasley Associates www.beasleyassociates.com

Any further comments on this policy?

No comments

Policy 2: Setting a CO_2eq standard for municipal waste management activities to reduce their impact on climate change

What do you think about a CO_2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

Veolia Environmental Services supports this approach, but it is important that base levels are agreed with industry, and assessments comparing alternatives are in relative terms - not on absolute GHG footprints. It is also important that the boundaries set for the alternatives being considered are consistent. We suggest that the Mayor makes use of a protocol such as that set by the waste industry, managed by the Environmental Services Association (ESA), based on EpE found at www.epe-asso.org/ang/5-1.php?id_rap=20

Any further comments on this policy?

No comment.

Policy 3: Capture the economic benefits of municipal waste management

What do you think are the key issues in establishing joint procurement contracts for waste authorities?

No comment.

What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

Local authorities should focus their activities on community issues, and not become involved in activities that are better performed by private sector specialist companies. We would not recommend that local authorities operate their own waste facilities.

Any further comments on this policy?

Veolia Environmental Services has for many years encouraged revenue sharing, because its gives both parties a vested interest in the success of the venture, and have a number of such arrangements with Local Authorities (e.g. our contracts with Westminster, Greenwich and Hampshire).

Policy 4: Achieving high municipal waste recycling and composting rates

What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

The prime barrier in ensuring that recycling and composting is straightforward part of Londoners' lives is the high density of the built environment, and lack of space for waste storage. Therefore collections must be as simple but effective as possible. Consideration should be given to the integration of collection and treatment methodologies, which can give high material capture and recovery rates. Such systems should negate the need for multiple bins and extensive storage, especially within environments that cannot support them, as well as decreasing street clutter, whilst increasing convenience within the home.

The collection of bio-waste (green garden and food waste), from inner city areas, especially flats and other high rise accommodation is a particular challenge. This barrier could hinder those Waste Authorities, whose housing stock is made up of a large proportion of this type of accommodation, from meeting the recycling and composting targets. Consideration might be given to separating these targets into two distinct targets for Waste Authorities with high proportions of flats.

What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

The draft Strategy sets very ambitious recycling and composting targets for London's municipal waste. The final target of 60% recycling and composting by 2031 will be a tough challenge, for many inner London Boroughs; especially given the difficulty in collecting sufficient waste for composting. In order to achieve this for London as a whole, the outer London Boroughs will have to achieve far higher levels of recycling and composting than the 60% proposed in the draft Strategy. Nevertheless, Veolia Environmental Services will be pleased to support the Mayor by working with the Boroughs to help achieve this goal.

What specific role do you think the Mayor has to play in improving recycling across London?

The Mayor must maintain his active interest and involvement, and continue to reinforce the behaviour change that is required. He must also press for a greater level of consistency of approach across the Boroughs.

Any further comments on this policy?

High capture rates will be needed in order to achieve these targets for recycling and composting; this will require high levels of participation from householders. It is our belief, given our experience with the collection of household waste in inner city areas, that co-mingled collection systems are far easier for householders to use, and that they result in higher recycling rates, compared to kerbside sorting. Also kerbside sorting requires collection vehicles to wait outside properties for longer periods; this is hardly compatible with GLA's aspirations to improve traffic flow, and to reduce congestion and CO_2 emissions in London.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

Yes, we believe that this should be the aspiration of the Municipal Waste Strategy; however in practice this may not be fully achievable. There will be occasions when the best environmental option will be to manage some waste outside of the Capital, for instance hazardous wastes (e.g. asbestos); the Strategy should therefore reflect this occasional need.

What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The provision of the right infrastructure will be key factor in the delivery of the Mayor's ambitious waste strategy for municipal waste, and we welcome many of the proposals contained in Policy 5. In particular we welcome the recognition of energy from waste in proposal 5.2, and the benefits that this technology will have in meeting London's energy demands, both in terms of electricity and heat. We look forward to the developments mentioned with regards to our SELCHP facility in Proposal 5.2, which will finally allow the provision of heat to the local community.

However, London faces many challenges, not the least of which are planning, and land availability. Land in London of sufficient area to accept facilities for waste management is relatively scarce, as well as being expensive, and should be protected in planning terms for such usage. It is also important not to lose land currently designated for waste management activities, for example our Rainham recovery facilities by the River Thames – particularly if new, proven technologies can be located there.

Any further comments on this policy?

No Comments

Policy 6: Achieving a high level of street cleanliness

What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

We believe that consistent enforcement strategies are essential, and that the provision of litter bins, including providing suitable smoking litter receptacles to cater for office workers who are required to stand outside to smoke, would promote better street cleanliness. Street cleanliness is also a perception that is strongly influenced by the condition of buildings, and furniture in the street. Campaigns to raise peoples' awareness of the interaction between a well kept built environment, perceived street cleanliness and anti-social behaviour need to be run regularly. Clean streets, lower crime.

What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

The Mayor must support a continuous education campaign to raise awareness. We support the Mayor's proposals in draft Policy 6, and believe that they will enhance the cleanliness of London's streets.

Any further comments on this policy?

No comments.

London Mayor's Draft Business Waste Strategy

Veolia Environmental Services (UK) Plc is generally supportive of the Mayor's draft strategic aims to increase recycling and recovery, and to improve the efficiency of the collection and treatment of London's business waste. The policies and proposals outlined in the current draft Business Waste Strategy will help to make London more self-sufficient, in terms of resource and waste management.

Policy 1: Promoting the financial and commercial value of a resource efficient business

What support do you need to help identify and implement waste prevention opportunities?

No comments.

What would make your organisation buy more sustainable goods and services, specifically re-used and recycled products and materials?

Veolia Environmental Services is a member of the Green 500, and monitors its environmental performance continually striving to achieve continuous improvement. Our purchasing selection process calls for our suppliers to meet certain sustainable development, and environmental criteria.

What would you like to see featured as part of a future waste reduction, re-use and recycling engagement programme for business waste producers?

No comments.

Other comments - is there anything else you think the Mayor should be doing to achieve the vision for this policy?

No comments.

Policy 2: Boosting re-use, recycling and composting participation in the commercial and industrial sector

Which types of waste are the priority for your organisation to:

All wastes should be managed in accordance with the waste hierarchy whenever possible.

What would make it easier for you to find / procure waste and recycling collection services?

No comments.

Do you think the proposals outlined will help you? Is there anything missing?

No comments.

Other comments - is there anything else you think the Mayor should be doing to achieve the vision for this policy?

Veolia Environmental Services attempts to work in cooperation with BIDS wherever possible. It should be noted, however, that in some instances when we are under contract to a London Borough that undertakes its own commercial waste collections, we are sometimes precluded from working with the BIDS, as it is construed as being in competition with the local authority (which is not permitted by the contract). We suggest that there needs to be more consistency between collection contracts issued by the Boroughs, and the overall objectives of the Mayor's strategy.

Tackling food waste from all C&I sectors is an important issue, for two key reasons. Firstly food waste is a significant source of GHG emissions when landfilled, and secondly it contaminates recyclable materials, lowering their commercial value. More effort is needed to encourage all producers of food waste to segregate it for alternative treatment, and we support the Mayor actions under this proposal.

Policy 3: Supporting the waste infrastructure market in London to grow and to deliver for business

Do you think the proposals outlined above will achieve the necessary conditions to deliver waste infrastructure development?

Obtaining planning permission for waste facilities is one of the biggest challenges to the development of waste infrastructure in the Capital. It is encouraging to see that the Mayor recognises this difficultly in the Strategy, and we hope that the expectations outlined in will help to deliver more timely planning decisions. In previous consultations on the Mayor's Business Waste Strategy mention was made of funding of the order of £18 million over three years. It would seem that this funding stream will no longer be available, and we are

concerned that without sufficient funding there will be a lack of basic waste infrastructure in London, and that without the basics, it will be difficult to deliver the aims of this Strategy.

Do you see any issues with the proposed move towards more waste management taking place in London?

London faces may challenges, not the least of which are planning, and land availability. Land in London of sufficient area to accept facilities for waste management is relatively scarce, as well as being expensive, and should be protected in planning terms for such usage. It is also important not to lose land currently designated for waste management activities, for example our Rainham recovery facilities by the River Thames – particularly if new, proven technologies can be located there.

Other comments - is there anything else you think the Mayor should be doing to achieve the vision for this policy?

No comment

Policy 4: Drive improvements in resource efficiency in the construction and demolition sector whilst continuing to maintain good levels of re-use and recycling performance already being achieved.

What do you feel are the pros and cons of enforcing good waste management through the planning process?

We believe that London Boroughs must designate land for waste processing within their planning frameworks.

What do you think are the key considerations in designing out waste in new developments?

Adequate provision for waste storage and easy vehicular access to collect it.

Other comments - is there anything else you think the Mayor should be doing to achieve the vision for this policy?

No comments.

Do you have any further general comments or observations about this strategy? Is there anything else you think the Mayor should be doing?

No comments.

Draft Waste Strategy Consultation
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18th January 2011

THE MAYOR'S DRAFT WASTE STRATEGY - CONSULTATION RESPONSE

Dear sir or madam,

This response covers fundamental points related to the Mayor's Waste Strategy, which notably refer to inter-connected matters associated with social, economic and environmental considerations. The points raised in this response include linkage to the Waste Hierarchy, soon to be statutory under EU Waste Framework Directive ("rWFD") 2008) and opportunities for London around renewable forms of *"waste-to-energy",* related to targets in the London Plan.

In general the UK's waste policies have so far led to expensive, carbon intensive source separation of *initially* mainly heavy, non-active materials being "recycled" (e.g. metals and glass). The UK Waste Strategy *then* led Councils to expand their 'recycling achievements' by separately collecting paper, plastics and food wastes. Separating food wastes can lead to increasing concern and annoyance of many voters (as regularly covered by the press), as well as increasing vermin risks and disease spread risks, which are tangible especially in a major urban area.

There have been few fiscal incentives for developing UK waste infrastructure other than via PFI, which has led to a surge in mass-burn incineration ("MBI") - one of the most inefficient and expensive forms of energy production, using mostly imported technology.

MBI is not at all Carbon efficient compared to technology alternatives (not to landfill) and it is essentially a disposal operation by the nature of the low level efficiency and reliability compared to power generation using commercial fuels. By advocating 25-30 year MSW contracts to support such MBI schemes, there can be little innovation and support of British manufacturing and design, so no *additionality to the economy*.

Previous UK policies of quick fix, short sighted "recycling" target trends have also led to higher concentrations of batteries and e-waste going to landfill or incineration. Most landfill leachate treatment plants only reduce ammonia, BOD and an amount of suspended solids, not the toxic characteristics from such hazardous (and precious metals) material slowly leaching into watercourses and causing bio-accumulation legacies.

Even the level of 'environmental crime' has been exacerbated by "recycling" where certain companies bale raw / part processed wastes for export. If the Mayor wants to increase 'reduction and re-use' (moving up the Waste Hierarchy) it may be wise to consider switching existing kerbside separation schemes to remove [priority] hazardous materials (i.e. 'reduce') from the main *'resource stream',* for example this links back to 'product design and life cycle', so relates to batteries, e-waste, DIY materials (e.g. paints, glues, etc).

Meeting the rWFD and 'moving up the Waste Hierarchy' could be done by also encouraging removal of clothing, toys, sports equipment, kitchen / household items, etc for 're-use'. These *re-usable items* could be used for social value (e.g. the 'Big Society') via community warehousing schemes allowing low income families, etc to obtain useful items, save money, provide for their young families, etc. Therefore, both the reducables and re-usables streams could be collected much less frequently via a *monthly* box (i.e. re-using the ones they already have).

It is strongly urged that the Mayor should propose heavier weighting on removal of such 'priority' wastes and on Carbon scoring criteria for new infrastructure and indeed Council MSW tenders.

The Environment Agency ("EA") is already encouraging technology companies to publish the Carbon scoring data for their systems (called the WRATE model) on the EA's website. The WRATE model (life

cycle assessment) is independently verifiable and is based on science and facts (much needed in this sector), so should encourage less 'miles per tonne' (a potential policy criteria for London – Carbon linked), compared to the high miles per tonne associated with source separation collection schemes.

Such source separation trends are leading to Councils collecting even worse '*volume to weight' materials*, such as plastics bottles, cardboard boxes (except when adsorbing rain!), etc. Collection costs will likely be an area for review as Councils are faced with cuts and priority funding areas of health and education. As London Councils are often high population density areas, facing budget cuts and social policy pressures, the proposals made herein could help substantially.

Similarly, any encouragement of business or Councils towards source separation of bio-waste (and other materials) should be reviewed immediately and considered very cautiously. The improvement in waste collection services and human attitude to hygience / sanitation of "waste" is very important and something that takes decades to establish thoroughly across urban areas. Safety issues around source separation and handling heavy bins (e.g. food wastes) should also be considered. Accidents in the waste sector have risen substantially since separate collection systems have grown, plus vehicle overloading dangers and congestion (especially from street sorting) will not work well in London.

For all of these reasons and more, caution should be taken by the Mayor in his promotion of anaerobic digestion (AD) as THE solution for biowaste. AD has its place, but only has ca. 5% mass loss as biogas for renewable energy / transport fuel. Therefore, it is best for AD plants to be located in rural areas, close to large food / drink manufacturers and suitable farm land to take 95% of the output. It is common for nearly all plants to have odour problems. There are also bunding issues for AD plants, due to potential leaks and tanks have even collapsed before, leading to major accidents and environmental incidents – something that the River Thames could do without.

Preparing the balance of feedstock (C:N ratios, pH, dry matter, gas potential, inerts removal, etc) is key to running an AD plant (a bit of a 'black art' in itself) and source separated organics do not always produce the best or most reliable gas yield or gas quality as proven in other Countries using AD.

All of the above points contribute to providing London with a much more responsible approach (looking at the 'cradle-to-grave' impacts of how society works) and also leads to most of the 'waste stream' (the bulk of the waste resources) going into a 'single bin collection' i.e. for the non-hazardous, non-reusable, residual wastes. This *weekly* collected single bin would:

1. Reduce health and safety issues (kerbside sorting leads to many accidents and even deaths),
2. Reduce vermin build up issues and disease spread risks (e.g. SARS, Bird Flu, HIV, etc)
3. Encourage the use of larger trucks and more efficient collection systems with less miles per tonne.
4. Encourage the delivery of processing plants for the bulk of materials, which can be fully automated and enclosed for no manual sorting of raw wastes.
5. Encourage sustainable infrastructure and investment for local up-skilling of the workforce (i.e. engineering / technical jobs)
6. Lead to highly processed outputs - potentially to no longer be classed as 'waste', subject to applications for 'End-of-Waste' (by legal / EA application means) without the pre-requisite of [expensive, Carbon inefficient] source separation (currently encouraged by the Protocols).
7. Make the Mayor's challenges easier to cost-effectively meet the statutory requirements of the Waste Hierarchy in light of economic pressures on Councils, businesses and Tax payers. London would not have to rely so heavily on source segregation, which is not particularly practical for high urban density areas.
8. Avoid reliance on human controls for source separation quality of materials, linked to human error risk and safety issues. A renewed emphasis to look at the whole life cycle picture in terms of Carbon performance and other social / urban issues would be far better placed as criteria to suit London's needs and future continuous improvement goals.

I hope these points are of interest to the Mayor and that they assist in achieving the combined challenge of cutting costs, cutting Carbon usage, maintaining health, safety and hygiene standards and managing London's waste more sustainably.

If you would like any further detail / data to clarify / verify any of these statements, please do not hesitate to contact me.

Greater London Authority Consultation On

The Mayor's Draft Municipal Waste Management Strategy

January 2011

Introduction:

The company is one of London and the UK's leading recycling, waste management and renewable energy companies. The company provides the full range of recycling and waste services including advanced materials recycling, glass and plastics reprocessing, anaerobic digestion, composting, mechanical & biological treatment, waste to energy, transport, collection, and safe and efficient landfill disposal. Each year the company recycles c.2 million tonnes of materials, has the capacity to generate over 127.5 megawatts of renewable energy and handles over 8 million tonnes of waste material.

The company operates it's 'London Recycling' services providing essential commercial and industrial recycling collections across much of the Capital. The company has supporting recycling, renewable power and waste disposal operations in and around London.

The company won an award at the 2010 national recycling awards. The company is also a recent two-time award winner in the DEFRA-sponsored Awards for Excellence in Waste and Recycling.

The company believes that the proposed adoption of the Mayor's Waste Strategies in 2011 is timely. There is currently a good and broad understanding of the main drivers affecting recycling and waste management in London, namely: EU landfill diversion targets, the landfill tax, the drive for greater levels of recycling and resource efficiency and the important contribution of waste derived renewable energy. There are substantial challenges involved in delivering on these issues. The strategies should help to enable improved coordination and the timely development and delivery of infrastructure and services to assist London's moves towards greater resource efficiency and its overall waste and resource management ambitions.

The main areas of opportunity include:

- Building on the excellent progress made in recycling and the contribution that this, along with energy recovery and progressive waste management, has made towards London and the UK's carbon reduction agenda.

- Improved coordination of municipal and commercial and industrial waste management services and infrastructure. There are substantial economies of scale to be realised in jointly managing these waste streams in London, and previous strategies, regulations and mechanisms have disproportionately focused on municipal waste, despite this being a small proportion of total volumes.

- Ensuring significant and substantial progress implementing the Mayor's waste hierarchy is encouraged, by considering practical mechanisms to incentivise the recovery stage as well as reduction, re-use and recycling. The company estimates that up to 6% of total UK electricity could come from energy from waste in all its forms by 2015-2020.

- Improving the current unresponsive, slow and costly planning process. The responsibility of localism should include statutory duties to prepare and approve local waste development plans to facilitate delivery of the required infrastructure. Waste treatment and recovery facilities should be considered as essential and sustainable development within local development frameworks.

- Ensuring clarity, stability and consistency in policy at UK and London/regional levels. The main drivers and mechanisms in place are working towards the overall objectives of landfill diversion, higher recycling levels and greater resource efficiency. Clarity, stability and consistency, alongside improvements and refined incentivisations, are required for continued investment and progress in this area.

Policy 1. Inform producers and consumers of the value of reducing, reusing and recycling.

1. *What do you think are the key issues that need to be addressed in order to achieve this vision?*

The company has identified the main areas of opportunity in the general introduction section above.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The company supports the Mayor's objectives and agrees that these are in line with the main areas of opportunity as identified above.

3. What are your views on the Mayor's targets for reduction and re-use? Are they achievable or stretching enough?

The targets are ambitious. It is unclear what the target figures (10% by 2020, 20% by 2031) are based upon. Evidence suggests that waste volumes remain linked to economic growth (although there are also indications that there may be stabilisation) and there is therefore a risk that, as the economy picks up, so municipal waste volumes may grow (or flatline) at the beginning of the period when the Mayor's strategy is aiming for reduction.

Good work has been done on prioritising materials and methods for waste prevention via the now defunct National Resource and Waste Forum (e.g. the Household Waste Prevention Toolkit, now managed by WRAP, etc.) This work should be reviewed and updated for London, led by the GLA.

Evidence also shows that good and convenient household recycling services for multi-material streams help raise awareness of waste generation within the home. This can lead to stabilising or reducing overall waste volumes generated. Best value can therefore be delivered by 'piggy-backing' messages around waste prevention onto recycling campaigns.

Don't get hung up on measuring waste prevention, the link between waste production and economic growth remains inextricable and recent studies (e.g. by the European Topic Centre on Sustainable Production and Consumption) suggest that this will

remain the case. These studies suggest that the rate of waste arisings growth should stabilise and reduce, largely due to the drivers and services in place.

4. *What do you see as the key considerations for developing a successful London-wide reuse network?*

The company supports reuse where there is demand and clear market opportunities. Partnership delivery and coordination between public, private and voluntary sectors should be encouraged.

Reuse is generally constrained by the level of demand for resultant 'products'. All sectors should consider the viability of markets for re-use. If costs of preparation outweigh value then the economic or environmental benefits, or sustainability, are questionable. Warranties are also required that reused items are safe and items have a suitable life that makes reuse worthwhile. Service and regulatory standards (especially health and safety) should not be compromised in the delivery and development of reuse networks.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

WRAP (and previously Envirowise) has the remit to provide such mentoring. Good quality recycling service providers often also provide auditing and advice services in this area.

6. Any further comments in this policy area?

No.

Policy 2: Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

The primary reason for waste management and recycling services is the protection of human health and the environment. There is sufficient information to demonstrate the progress that continues to be made by local authorities and the waste and recycling industry in carbon reduction through the mechanisms and drivers currently in place and currently accelerating these benefits.

This is a complex area and there is a risk of introducing overly bureaucratic reporting requirements on all parties at a time when such indicators are being reduced at a national level. This will slow progress.

In the Mayor's Municipal Waste Management Strategy, policy 2 proposes that CO2eq emission performance standards should be set to inform the way waste authorities perform their role in managing municipal waste. As part of this policy, Proposal 2.3 is

'In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.'

We consider that the way that this proposal is being implemented is misconceived. While we agree that energy efficiency is an important consideration when considering energy generation from waste, there is a danger that proposal 2.3, as currently designed, will merely divert waste from energy recovery to landfill.

We have two specific concerns with the proposed approach:

1. **Avoided emissions from landfill**

   Proposal 2.3 treats waste like any other fuel which generates carbon dioxide derived from fossil fuels. This approach ignores the fact that energy recovery from waste also avoids the need to send that waste to landfill, where it would otherwise have released methane to atmosphere.

   We note that this approach is specifically justified in section 3 of Appendix 4b. Eunomia state that the emissions performance standard should only consider emissions from the thermal facility. This means that the calculation should:

   - *"Exclude any CO2 benefits of materials capture and subsequent reprocessing;*
   - *Exclude the emissions from any reject streams sent to landfill;*
   - *Exclude the parasitic load of fuel preparation facilities, but includes the 'parasitic load' of facilities generating energy;*
   - *Exclude direct emissions (including N2O) from fuel preparation facilities; and*
   - *Include the benefits of heat production and subsequent use when operating in CHP mode.*"

This is to ensure consistency with the Mayor's draft Climate Change Mitigation and Energy Strategy.

However, we do not agree that this approach is sensible.

Firstly, the avoided emissions from landfill are not actually listed above, but they are not included. The effect is that the take up of energy recovery facilities will be reduced and so the landfilling of residual waste will increase, thereby increasing the emissions of methane to atmosphere, albeit outside London.

Secondly, excluding benefits of materials capture and reprocessing means that one of the benefits of incineration plants, the recovery of metals which are otherwise difficult to capture, would be ignored.

Thirdly, excluding the parasitic load and direct emissions from fuel preparation facilities may encourage the use of energy intensive fuel preparation systems to ensure that the energy recovery plant achieved the emission performance standard. This may not be the most energy efficient option overall.

Treatment of heat

Table 6 of the strategy shows indicated electricity and heat efficiencies which would be required. Under the CHP options, it is noted that generation efficiencies for heat assume a load factor of 60%, to take account of the proportion of heat which is used.

This is the approach taken by the consultancy Eunomia in their report for the Greater London Authority entitled “Greenhouse Gas Balances of Waste Management Scenarios”. The argument used then was that, because heat demand varies throughout the year but heat would be supplied continuously, some of the heat exported would be wasted. This would be a valid argument for power plants based on gas engines, where the heat is waste heat, but it is not valid for plants based on steam turbines. This is because the heat exported would be based on steam extracted from the turbine. If the heat demand drops, then this steam would instead be used for power generation.

It is not clear from the draft strategy exactly how the export of heat would be considered, since the emission performance standard is based on power exported. However, we assume that the benefit of exporting heat would be considered. We would recommend that the calculations which are used in practice should take account of the source of heat, as well as the demand for heat, so that the operation of steam turbines or gas engines is correctly considered.

To summarise: The measurements used to inform the policy are flawed and have the effect of elevating landfill above Energy from Waste as landfill emissions are not calculated. Is it right that a policy would lead to landfill being higher than energy recovery in the waste hierarchy? Materials capture and reprocessing are excluded as being beneficial and suggest that metal recycling at about 2%-4% of municipal waste would be overlooked. The policy creates a perversity in excluding parasitic load and direct emissions for fuel preparation plants and is therefore loose in where it chooses to account for externalities and internalities.

The treatment of heat is not based on supply and demand relationships. Rather, it is based on an argument that negates the way power plant with steam turbines are used. Such plants compared to gas engine plant enable switching to electricity generation when heat demand is low and would otherwise be wasted. It is not clear from the draft strategy exactly how the export of heat would be considered since the emission performance standard is based on power exported and we recommend that the calculations used in practice should take account of the supply and demand for heat so the operation of steam turbines and gas engines is correctly considered.

8. Any further comments on this policy?

There is a real risk that setting a CO2eq standard for London that goes over and above national regulatory, planning and environmental requirements will disincentivise the provision of essential infrastructure by the unnecessary distortion of the market for recycling and waste treatment, thus hindering attempts to make substantial progress up the waste hierarchy.

The Waste Framework Directive puts a statutory obligation on Member States to implement the five stage hierarchy which puts recovery above landfill.

Policy 3: Capture the economic benefits of municipal waste management

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities.

Where this does not already occur or exist, The company views it as potentially a natural market progression, although we remain neutral as to whether contracts should be procured jointly or individually by councils. Local authorities will always

review opportunities for greater efficiencies in any given service. Where commonality of purpose exists and economies of scale and service are offered in the areas of recycling and waste management, then JWAs may offer advantages. Whether this offers real improvement and efficiencies will depend how contracts are written, bundled, procured and managed.

Key issues include the financial security and robustness of any JWA and resulting bankability of contracts, along with the constitution and governance of the JWA.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

The key role for local authorities with regard to waste management collection and disposal services is to commission and procure quality, cost effective and continuously improving services from the private sector. The private sector is best placed to provide cost effective and innovative solutions, infrastructure and services, and to manage the risks associated with large scale projects. The company sees no benefit in reversing this principle.

The role of the public sector in waste services should also be limited to responsibilities for municipal waste only. The public sector generally have neither the resources nor often the experience or expertise for any expanded role, due largely to the historic development of the waste sector over the last couple of decades. Partnerships should continue to be encouraged. It surely does not provide value to the taxpayer when local authorities get involved in commercial and industrial collections, for example, resulting in falsely subsidised collections and this negatively impacts on local competition.

The expense of outsourcing risk is counterbalanced by the expertise and fiscal certainty provided. Revenue sharing waste contracts (e.g. for recyclates and energy produced) are increasingly common practice.

Policy 4: Achieving high municipal waste recycling and composting rates.

12. *What do you see as key barriers in working to ensure recycling and composting is a straightforward part of Londoners lives?*

The company is generally supportive of the measures suggested to improve London's recycling and composting performance. It should be acknowledged that the diverse demographic make-up of London will always require differences in recycling and waste management systems. Individual authorities remain best placed to reflect this in matching local requirements to service options.

Composting of green materials will naturally be less relevant to many inner-London areas.

Convenient and 'hassle-free' recycling services, aligned with effective communications to customers will ensure good participation levels in recycling collections (as well as well-designed and operated bring schemes) and therefore the supply of quality materials for recycling. It is important to note that the market already provides for the production and marketing of quality recycled materials to reprocessors. By working with service providers, authorities can minimise exposure to market fluctuations.

13. What are your views on the recycling targets set by the Mayor – are they achievable or stretching enough?

Measures to encourage higher levels of recycling are laudable and the GLA is in a good position to coordinate such efforts working closely with local authorities and their contractors and partners.

Ensuring clarity, stability and consistency in policy at UK and London/regional levels is important. The main drivers and mechanisms in place are working towards the overall objectives of landfill diversion, higher recycling levels and greater resource efficiency. Clarity, stability and consistency, alongside improvements and refined incentivisations, are required for continued investment and progress in this area.

The targets are challenging and ambitious. It is unclear what objective evidence they are based on, nor why targets over and above UK requirements are required. In many areas they could be achievable, but any London-wide targets will require high-performing boroughs to over-achieve to compensate for poor performers. Rigid targets can often lead to materials being collected for recycling, regardless of economic or environmental benefit.

There are also substantial cost implications for such targets. There are currently diminishing returns above certain recycling rates for MSW and sustained high levels could also be affected by market fluctuations.

14. What specific role do you think the Mayor has to play in improving recycling across London?

See above response.

15. Any further comments on this policy?

The focus of The company with regards to recycling services is always on the quality of output (recovered materials). Evidence demonstrates that this can be achieved both via commingled collections and central sorting and processing at well-managed and resourced MRFs, and by kerbside segregated systems. The Mayor's strategy should therefore remain neutral on collection methods.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low carbon technologies.

16. Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?

The company supports this vision where practicable and economically and/or environmentally beneficial. It is consistent with the proximity principle.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

Key barriers include the availability of suitable sites at reasonable cost and identified for such use within the planning system, and the ability of the local planning system to actually provide relevant consents.

The company supports some of the Environmental Service Association's suggestions to overcome the latter by incentivising communities and authorities to accept such developments, including directing proportions of business rates raised back to local communities and bringing forward the negotiation of section 106 agreements to enable communities to assess community benefit in full and in advance.

18. Any further comments on this policy?

The CO2eq emissions performance standard as suggested in the current draft may well prevent infrastructure that is required to move London up the Mayor's waste hierarchy from actually being delivered, via the lack of 'technology neutrality', e.g.by potentially favouring unproven technologies over others regardless of true economic or environmental performance compared to existing and potential alternatives.

Policy 6: Achieving a high level of street cleanliness

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

The company supports policy and actions to improve street cleanliness, deliver high quality local environments and reduce fly-tipping and environmental crime.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking; are there any others he should be considering?

The company supports the Mayor's and local authorities' efforts in this area.

A response to the consultation on the Mayor's waste strategy

The following comments were compiled by the organisation in conjunction with feedback from its members in December 2010.

Of the six policy areas identified in the draft waste strategy policy area 1 and policy area 3 are the most pertinent to the reuse sector.

Our responses are given below according to sections in the document or by the questions prompted in the on line response forms on the website. Extracts from the strategy document are in italics.

Policy area 1: ***inform producers and consumers of the value of reducing reusing and recycling***

From vision to policy

The mayor will work with local authorities, the third sector, businesses and the waste industry to promote the reduction, reuse and recycling of municipal waste with the aim of decreasing the amount of municipal waste produced.

More clarity on use of the term "work with" is required to ensure actions are compliant with the intentions of the strategy. Examples of "work with" in terms of reuse could be:
To obligate the inclusion of reuse clauses in all future waste collection authority's waste contracts. Seek endorsement of the revised wording from the organisation

Policy area 1 from policy to action

Proposal 1.1 setting waste reduction and reuse targets.
The reuse sector supports the London wide target to reduce household waste by 10 percent per household of 2008/09.

The mayor will set a target to increase the amount of London's municipal waste that could be reused or repaired from 6000 tonnes each year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031.

The reuse sector expresses strongly that the reuse targets are in need of re-evaluation at this consultation stage for the following reasons:

1) The wording of policy 1 does not directly link to the investment needed to achieve the tonnage targets set. Policy 1 is focussed on engaging with people therefore the target that follows should be set on the number of people engaging in reuse. The tonnage target should be set against a level of investment.

2) The proportion of investment being made to the LRN is not relative to the growth expectation of the reuse sector. The reuse sector is quoted in the consultation document to be expected to handle 1% of the municipal waste stream yet this bears no correlation to the level of investment being available from LWaRB to redress the problem. While the LWaRB fund has pledged to award £8 million over the next 6 years, the London reuse sector's annual turnover is estimated at £6.7 million.

3) The tonnage target figure of 40,000 tonnes is not explained anywhere in the document, it would be useful to put into context as being primarily a factor of the municipal bulky waste stream. There is no indication of the composition of this tonnage, what proportion of the whole that it represents ie the scale of the waste problem and does not necessarily. The reuse sector cannot confirm that the figure of 40,000 tonnes by 2015 is realistic. The reuse sub-committee of the ORGANISATION Board are currently working on a tonnage analysis to check that the LRN projections are correlated to the capacity of the practitioners.

4) The target of 120,000 tonnes by 2031 is a figure that the reuse sector is not comfortable with because no assessment has been done on whether this amount of reusable waste exists and of its composition. Unless we are able to measure the source of the waste, availability of it for reuse and capacity of the sector to process it then the target is fanciful. Alternatively work needs to be done on projecting the anticipated tonnage available for reuse in the municipal waste stream and then set a target which the reuse sector can strive to achieve.

Proposal 1.2 supporting London wide communications campaigns that promote municipal waste reduction, reuse and recycling.

The stated vision that consumers understand and respond to the value of reducing reusing and recycling is a sound one. The strong opinion of the reuse sector is that this change will only be achieved by a sustained strategic marketing campaign that runs for 2 or more years. The reuse sector envisage the marketing campaign will influence a change in the underlying behaviour of the public towards reuse. There is no support for short term "appeal" style advertising that creates a knee jerk reaction to reuse. It is firmly understood by the sector that the success of this marketing campaign will be achieved from an undertaking first of all of market research to find out the triggers for reuse and the methods of increasing understanding and values of the public at large. Very little is known about the reuse customer base in London which at present is based largely on the welfare and charitable supply. The reuse sector believes that the extent of the customer base for reuse remains untapped. Comparisons with more advanced reuse behaviours on continental Europe are helpful.

The Mayor through Recycle for London with provide Zero waste places projects in London as a means to showcase best practice …

The location of Zero Waste places must coincide with deliberately placed reuse services to ensure the maximum effect of zero waste and to support the high profile message these places are intended to bring. The 2008 research identified a correlation between boroughs with reuse services located within them and high reuse tonnage showing that proximity is a key factor for success.

The proximity principle is one of the leading principles in European waste policy should also be emphasised in this respect for proper reuse it is usually essential to sort out products such as furniture and appliances in the earliest possible stage of the treatment chain there fore appropriate measures should be taken to establish an integrated network of reuse facilities based on the existing infrastructure which emphasises the management and control of reuse at the first point it becomes at risk of waste. In practice this means supporting a reuse methodology that starts at the collection from existing owner whether that be the domestic householder or the business.

Proposal 1.4 tackling barriers to providing effective reuse services. The Mayor will work with third sector organisations … to tackle barriers that make it hard for the third sector to deliver local authority reuse and recycling services.

The reuse sector is keen to emphasis the importance of the inclusion of proposal 1.4. There are numerous barriers yet to overcome in bringing reuse collection services into mainstream waste management services.

Proposal 1.4 b) working with waste authorities to link their bulky waste service, where practicable, with local reuse services when developing municipal waste contracts.

The use of the term "where practicable " is unambitious for a report that tries to communicate ambitiousness to achieve such a challenging transformation of waste in London. Therefore this limitation /restriction should be removed.

The use of the term "when developing municipal waste contracts" is limiting. This will restrict making progress to a fixed contracts timetable. THE ORGANISATION have investigated the contracts timetable for all 33 London boroughs, it reveals that in 2011 there are only two contracts due for re-tendering, in 2012 there are three, in 2013 there are three. Proposal 1.4 must not be restricted to such small opportunities to change services. THE ORGANISATION therefore recommend opening up the commitment to work with waste authorities to link their bulky waste service with local reuse services at any point where opportunities present themselves due to economic, environmental, social and political factors.

This proposal 1.4 lacks any directional guidance for waste authorities to move from current waste practices to new ways of arrange services with reuse as a mainstream service. It may require specific reference to examples of barriers, such as procurement rules.

Question from the online form: what are your views on the Mayor's targets for reduction and reuse? Are they achievable or stretching enough?
This question has been answered in policy area 1.1 above. The only remark to add here is that the setting of reuse targets should be high but achievable with ambitious commitment. It is not advised to set low targets that can be achieved with moderate effort and well within time. a consequence of low targets is that they do not attract further investment. I terms of reuse which is a higher achievement in the waste hierarchy this would not be consistent with the Mayors strategy.

Also in answer to this question the organisation believes that the reuse targets are not defined properly. A more sophisticated definition is required that shows there will be a system of collection and processing for reuse where the primary purpose is reuse followed by a commitment to recycling. The reuse and recycling service would be capable of processing xx tonnes of bulky products and materials for reuse and recycling.

On-line question: What do you see as the key considerations for developing a successful London wide reuse network?
The key considerations as far as the organisation is concerned are:

- Support by the Mayor of a central management service for reuse that will coordinate and integrate reuse services.

- Sufficient level of investment to front-line reuse practitioners. The level set aside for reuse by LWaRB in 2010 may not be sufficient in the long term if reuse becomes more widely practised by the public and businesses. In comparison with the level of expenditure on recycling there is a need for watchful caution that more commitment will be needed.
- Full commitment from the waste authorities to the LRN plan developed by the organisation
- Full commitment by recycle for London to a strategic marketing campaign on reuse that overcomes the likely ignorance, lack of understanding and appeal of reuse to the masses.

Policy 3 *capture the economic benefits of municipal waste management*

There is a lack of references to the creation of employment opportunities through the reuse network and indeed the wider waste management sector where green jobs will be in high profile. Therefore the strategy should place value on creating training and employment opportunities for London residents as a way to keep the local economy buoyant.

General comments

Business reuse comment

With regard to business reuse the organisation calls upon the mayor's strategy to be aware of the effects of the take back legislation that exists for producer responsibility of WEEE, plus any other developments in future along these lines for other consumer products, and make sure that reuse with its socially preferable options is not hindered purely for a lesser achievement of recycling.

The producer responsibility for take back and treatment of some end of life products has led to the producers entering the market to treat the totality of products in a centralised way. This has reduced access to reusable products and thus the activities of the social economy in repair reuse and recycling . Although it is right that producers should be financially responsible in respect of the take back it is not desirable for a strategy to allow producers to organise and control the entire chain from collection to treatment. This system is leading to attempts to shorten the technical lifecycle of a product going against consumer interests.

Social impacts

We believe that insufficient reference is given to the social impacts of the proposed policy area 1 in particular in terms of how they relate to the community reuse sector. In essence the achievement of higher reuse tonnage is largely but not wholly dependant on using reuse as a measure to alleviate poverty and to improve poor housing conditions and alleviate debt for low income families. These factors should be measured only to show the added value to the environmental benefit of reuse but also to demonstrate that the success of reuse is a function of the social impacts.

THE MAYOR'S DRAFT MUNICIPAL WASTE STRATEGY - CONSULTATION

The organisation welcomes this opportunity to comment on the Mayor's proposals for a waste management strategy for the capital.

Across the UK, charity shops raised around £170m in 2010 for vital local, national and international causes.

Role of charity retail in promoting re-use

Charity shops play a considerable role in promoting local re-use, particularly of donated textiles.

Last year, we estimate that about 360,000t of used textiles passed through charity shops. Pro-rated to shops, this means about 26,000t of textiles were donated to London charity shops. Of these, about 52% were sold in-store for direct, local re-use. The overwhelming bulk of the remainder were sold on for re-use or recycling elsewhere. Only about 2% found their way to the waste stream.

In addition, charity retailers re-use or recycle significant numbers of books, DVDs and videos, domestic goods and – increasingly – furniture and electricals.

Donations to charity shops are not waste. Re-use via sales in charity shops is, therefore, a waste prevention activity, right at the top of the waste hierarchy.

Comments on the Mayor's draft strategy

We have only brief, general comments, which we hope may be the start of a dialogue with officials.

Broadly, we welcome and support the strategy to move towards zero waste. But, such a strategy can only succeed if it reflects and respects the waste hierarchy. The strategy must, therefore, start at the top of the hierarchy, exploiting all opportunities to prevent waste in the first place.

There are charity shops on high streets across London, and they are ideally placed to promote re-use of goods. They are recognised re-users of goods and have instantly recognisable local and national brands.

Our regular consumer attitudes surveys note that a significant number of donors to, and customers of, charity shops have an environmental motive in mind when they enter charity shops.

And, the carbon benefits of re-using goods, such as in charity shops, are clear. A report[1] by consultants, Oakdene Hollins, for the Department for Environment, Food & Rural Affairs concluded that re-use of unwanted clothing could save up to 33kg/kg of CO_2e, compared to disposal, and 29kg/kg, compared to recycling.

For these reasons, we believe the charity retail sector in London can play a significant role in helping to achieve the Mayor's goals, particularly *Objective 1*. To that end, we would be more than happy to meet with officials, or take part in other fora, to consider how best charity retailers might contribute to making London waste-free.

[1] Recycling of Low Grade Clothing Waste: Oakdene Hollins Ltd, Salvation Army Trading Company Ltd, 2006 (http://www.oakdenehollins.co.uk/pdf/Recycle-Low-Grade-Clothing.pdf)

LONDON REMADE

Draft Waste Strategy Consultation Team
Greater London Authority
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14 January 2011

Dear Mayor

Mayor's draft municipal and business waste strategies

I am pleased to be able, on behalf of London Remade, to submit a series of remarks in response to the Public Consultation on each of the Mayor's draft municipal and business waste strategies.

In broad terms, we welcome the strategies, both of which appear well grounded in the evidence base and both of which seem to acknowledge two of the key issues for the future, namely the importance of waste prevention; and the connection between waste and energy/CO_2 emissions.

In general, however, we feel that there is a disconnect between the overall ambitions set out in the strategies and the proposals intended to achieve those ambitions. The size and complexity of the waste system in London is such that we believe that much stronger leadership action, from the Mayor and the Greater London Authority, will be required over the next few years if the scale of infrastructural developments and behaviour change that the capital needs are to be achieved.

We have set out our specific comments, below, for each of the policies in the two strategies.

Draft Municipal Waste Management Strategy

Policy 1 – Inform producers and consumers of the value of reducing, reusing and recycling

We welcome the focus on 'the aim of decreasing the amount of municipal waste produced' (rather than, for example, a recycling rate).

However, we are cautious about the value of merely 'informing' producers and consumers. A growing body of research into behaviour change (see e.g. 'Mindspace' from the Institute for Government) shows clearly that information is not enough. We would recommend that a more sophisticated array of behaviour change interventions will be required to achieve the kinds of targets set out in the strategy.

Proposal 1.1 – we welcome the setting of stringent targets for waste reduction and re-use: however, and following on from the above point, we are not convinced that the measures set out in the strategy have the necessary muscle to achieve the kinds of reductions set out in Proposal 1.1.

Proposal 1.2 – communications, the showcasing of best practice and a focus on boosting recycling in flats are all to be welcomed. A re-use network, too, is, in our view, a positive proposition. Again, however, our anxiety is that, given the scale of the waste challenge, the momentum behind 'consumerism' and the evolution of waste behaviour in recent years, that more robust measures will be required to bring about the intended changes. The increase in recycling rates that we have seen in recent years has been, as a number of commentators have suggested, 'the easy bit'. Future changes in waste behaviour are likely to be much tougher to achieve, and the strategy as currently presented seems not to acknowledge this.

Proposal 1.3 – we welcome the support for the Green Procurement Code which, we believe, has made an important contribution to improving London's waste performance and will continue to be able to do so in the future. We welcome, too, the idea of business mentoring – peer-to-peer learning has been repeatedly shown to be more effective than other forms of transmitting experiences.

We are also excited at the idea of a design competition. London has a particular concentration of businesses and universities that focus upon design, and is therefore in a position to make a contribution to 'designing out waste' that extends well beyond the city's borders. We are markedly less persuaded, however, that there ought to be a focus on 'packaging': a great deal of packaging reduction has already been achieved in recent years, and packaging's contribution to total waste is increasingly symbolic rather than real.

Proposal 1.4 – we welcome the suggestion that it should be made easier for the third sector to provide re-use support to local authorities. This has, however, been repeatedly attempted in the past, with only limited success. We would recommend that significantly more robust measures will be required if this change is to be achieved. We note the language used with respect to EPS (see below) and would suggest that similar language could be used with respect to the involvement of the third sector e.g. that Mayoral support 'will be withheld' from waste contracts that fail either adequately to involve the third sector or fail to demonstrate how the functions (broadly defined) that might otherwise have been provided by the third sector are being met.

Policy 2 – "Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change"

We welcome the overall thrust and intention of this policy. The EPS would appear to be an innovative, outcome-based approach with the potential to have an important impact. We welcome, in particular, the firm language used with respect to this policy: e.g. "the Mayor will set a minimum CO_2eq performance".

Policy 3 – "Capture the economic benefits of municipal waste management"

Whilst in principle we agree with the sentiment that London's waste needs to be transformed from 'a problem to be disposed of' to 'an opportunity to be exploited', we are less persuaded that the specific proposals under this policy will be able to achieve this transition.

In particular, achieving efficiencies in waste contracting (policies 3.1, 3.2 and 3.3) are likely, in our view, to be much harder than the draft strategy implies; and the evidence of the past few years suggests that investments required to develop the kinds of waste management infrastructure London needs (3.4 and 3.5) will not be easy to achieve either.

In general, and in particular with respect to policies 3.4 and 3.5, we would recommend that much stronger intervention will be required: language such as "seek to provide" and "help waste authorities" is inadequate. The Mayor should, in our view, adopt an 'invest to save' approach and use his powers with respect to waste management contracts to 'require' investment levels commensurate with the waste targets specified elsewhere in the strategy.

Policy 4 – "Achieving high municipal waste recycling and composting rates"

We welcome the thrust of this policy, and believe that the proposals set out under the policy comprise a sensible array of actions in pursuit of the targets set out in proposal 4.1.

We would note, however, that proposal 4.6 – "The mayor will work with waste authorities to provide incentives for Londoners to recycle and compost" – is, in its current form, inadequate. Research from around the world (see e.g. Defra's evidence base at WR1204) has shown that incentives can be one of the most powerful tools for bringing about changes in waste behaviour, among both householders and businesses. The specifics of those incentives – their manner, type, timing, scale and so forth – are crucially important. A robust, progressive and ambitious programme for introducing incentives would be very different from, say, a token effort. The strategy, as drafted, gives no indication of the intensity with which incentives might be used, nor what kind of incentives might be preferred.

Given their potential to play a major part in achieving the kinds of transformation in waste behaviour that the strategy acknowledges will be required, we would argue that much more detail is required here; and that that detail should be based on an ambitious and challenging incentives structure.

Policy 5 – "Catalysing municipal waste infrastructure in London, particularly low-carbon"

We broadly welcome the proposals under this policy.

Proposal 5.1 – it is essential that sufficient investment is undertaken to deliver improvements in London's waste management infrastructure. LWaRB's contribution is clearly important, and to be welcomed, but it is insufficient. In practice, investment will have to come from the private sector, and this will be funded primarily through income generated through waste management contracts. In the end, London's householders and businesses will pay for this investment, since all private sector investors will want a return on their investment.

There needs, therefore, to be greater transparency about this fact; and, since the majority of investment will only take place under the auspices of waste management contracts, there needs to be more explicit reference in the strategy to the role the Mayor can play. We would argue, as

above, that robust intervention is required to enable investment to come forward, and the Mayor is in a position to do this by requiring contracts to include explicit infrastructure delivery programmes.

Proposal 5.2 – we welcome the focus on waste's role as an energy source, and welcome, in particular, the emphasis on capturing the heat from energy-from-waste technologies

Proposals 5.3 and 5.4 – we welcome both of these proposals.

Policy 6 – Achieving a high level of street cleanliness

Attending to London's street scene is consistent with the Mayor's ambition of addressing the quality of life in London, and we welcome these proposals.

Closing Remarks

Overall, we would suggest that there are three areas which, if bolstered, could significantly improve the strategy:

- **behaviour change** – a more extensive and sophisticated approach to behaviour change will be required if the various targets in the strategy are to be achieved

- **Incentives** – incentives, particularly those aimed at householders, are highly likely to be required as part of the behaviour change programme just referred to, and need to be identified and explained in detail in the strategy

- **Contracts** – finally, it must be acknowledged that the entirety of London's waste is managed through a suite of municipal waste contracts, all of which provide mechanisms to address infrastructure questions, questions concerning the role of the third sector and so on. The Mayor should take a much more robust position with respect to those contracts in pursuit of the targets in the strategy, and the strategy itself should make this very clear.

Draft Business Waste Strategy

We welcome the publication of a draft business waste strategy. As is now increasingly appreciated, business waste is, in fact, a much larger proportion of the total waste stream, and progress towards a more resource efficient city must include the business waste component.

Policy 1 – promoting the financial and commercial value of a resource-efficient business

We welcome the intention behind this policy. Greater resource efficiency is likely to make good sense from both a business and an environmental point of view.

However, a substantial body of research suggests that the overwhelming majority of businesses are not aware of or attuned to the notion of resource efficiency; and, furthermore, that a wide range of

practical and psychological barriers prevent them from adopt more resource efficient practices. In our judgment, considerable effort will be required to bring about the kinds of changes in behaviour that will be necessary o meet the ambitious targets set out in the strategy.

Proposal 1.1 – supporting business to identify waste prevention opportunities is laudable, but we judge that considerable effort will need to be expended even to enable businesses to realise that they might need such support.

Proposal 1.2 – similarly, few businesses will, in our judgment, know what 'close the loop' means, and initiatives such as the Green Procurement Code may need to be significantly bolstered if progress is to be made against this proposal.

Proposal 1.3 – this proposal, to run campaigns, is – in our view – where most of the effort will need to be expended in the early period of the strategy. We would expect such campaigns to rely heavily on partnership working – with industry bodies, with business campaign organisations, with local authorities and with a specific sectoral focus – but none of this is mentioned in the proposal. We would strongly urge a more targeted and inclusive approach with respect to this proposal.

Policy 2 – Boosting re-use, recycling and composting participation in the commercial and industrial sector

We welcome this policy, the implication of which we interpret as being that industrial and commercial waste producers should begin to benefit from the same kinds of improvements in service infrastructure that have enabled householders to increase their recycling rate so dramatically in recent years.

Proposal 2.1 – we welcome this proposal, particularly the reference to collective contracting arrangements. We believe these will be appealing and cost-effective for businesses.

Proposal 2.2 – we agree with the suggestion of targeting the food-production sector in the capital, which is both large and a significant producer of waste.

Proposal 2.3 – focusing on multi-tenanted buildings and on large estates also appears to be a sensible suggestion; though careful attention will need to be given both to the legal issues (re. who owns and/or is responsible for commercial waste in shared facilities) and who promotes such schemes (champion businesses? Local authorities? Waste contractors? Different channels are, the evidence suggests, likely to have differing rates of success.)

Proposal 2.4 – improving storage and collection facilities again makes sense, but we are particularly concerned about how this might be achieved. We believe the strategy should have more detail on this important point.

Policy 3 – supporting the waste infrastructure market in London to grow and to deliver for businesses

We support the overall thrust of this policy, and consider proposals (3.1 to 3.6), both singly and collectively, to make a sensible contribution towards the achievement of the policy. We welcome, in particular, the attention paid to the need to enable/encourage (private sector) investment into waste infrastructure.

We would, however, note that there is no reference to the relationship between commercial and municipal waste management facilities. Whilst we acknowledge that there are significant legal and statutory distinctions between the two waste streams, our understanding is that for many waste management processes not only is the distinction entirely artificial but, more importantly, commercial viability can only be achieved if both streams are available (as a feedstock etc). Commercial viability is clearly the bedrock of investment confidence, so would expect the strategy to address this issue, in this context.

Policy 4 – drive improvements in resource efficiency in the construction and demolition sector whilst continuing to maintain good levels of re-use and recycling performance already achieved

We welcome this policy, in particular the suggestions that there should be a focus on 'designing out waste' at source.

Closing Remarks

Overall, we welcome the endeavour to address London's business waste at a strategic level, and much of the intention behind the draft strategy is to be applauded. We would recommend, however:

- **Behaviour change** – a greater acknowledgement of the barriers that prevent businesses from engaging with this agenda and, correspondingly, propositions for more effective techniques for reaching and communicating with businesses about resource efficiency

- **Linkages** – there needs to be a more explicit recognition, from the point of view of developing suitable waste management infrastructure, of the links between municipal and industrial & commercial waste streams

- **Partnerships** – since the Mayor has fewer delivery powers than is the case for municipal waste, there needs to be more explicit consideration of which partnerships should be associated with which initiatives in order to move this agenda forward.

We very much hope that these remarks prove useful to the team as they reflect on the draft strategies, and we look forward to seeing the final strategies in due course.

Yours sincerely



Colin Roberts - Chair

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LONDON REMADE

The Mayor's Draft Municipal Waste Management Plan

Comments on Public Consultation Draft

12 01 2011

1 INTRODUCTION

1.1 The opportunity to comment on the Mayor's Draft Municipal Waste Management Plan is appreciated and it is hoped that the comments below will assist in developing the Waste Management Plan.

1.2 It is noted that responses must be received by 14th January 2011 and can be sent by E-mail to viewsonwaste@london.gov.uk.

2 The Mayor's Vision

2.1 *Ultimately, the Mayor wants London to become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible?*

2.2 *The Mayor's vision is built upon his waste hierarchy, applied from the top down. The Mayor's waste hierarchy supports those activities further up the hierarchy that can achieve the greatest cost savings and environmental benefits over those activities further down it.*

2.2.1 The Mayor's vision is supported particularly as it recognises the importance of minimising the impact of climate change. However, it is suggested that the vision should also recognise that there is a growing scarcity of non-renewable natural resources. While this does not mean that the world is about to run out of natural resources many are becoming extremely short. This will lead to additional economic and environmental burdens. Resource efficiency is not only vital in conserving resources but resource use is ultimately reflected in the amount of waste produced. Simply put, less resource use means less waste. Non-renewable resource depletion places additional importance on closed loop recycling of at risk materials.

2.2.2 Therefore the vision for Mayor's waste strategy must also take account of long term economic, environmental and social sustainability.

2.2.3 The Mayor's Waste Hierarchy places the treatment of waste through a combined heat and power plant at a higher level than the treatment of untreated waste through a plant producing electricity only. While this is fully supported it is considered that recycling should be at a higher level than anaerobic digestion which in turn should be at a higher level than composting. This sends a clear message that paper and cardboard should

be recycled rather than composted. Anaerobic digestion should be higher than composting because it has a lower climate change impact, particularly where the resulting biogas is used as a transport fuel, injected into the gas grid or used in combined heat and power applications. As such it is low carbon, home grown, secure energy source. The resulting bio-fertiliser reduces the demand for a non-renewable resource which is rapidly rising in cost and has limited sources of supply. It also reduces the greenhouse gas emissions associated with the production and use of replaced mineral fertilisers. These issues will become increasingly important in future and it is suggested that they are fully accounted for in the preparation of the Waste Plan.

3 Objectives

3.1 *Item 1 - Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible*

3.1.1 Greater public education and awareness will be essential in achieving waste avoidance and waste reduction but is important that any support given to Waste Collection and Waste Disposal authorities as well as other organisations complements their actions. The Mayor should concentrate on areas where a London wide message can be delivered more efficiently by one organisation than a large number. This should be done through close cooperation with the organisations involved and existing lines of communication should be used for this wherever possible. It will also be important that that information about the environmental impact of products, services and waste are freely available and presented in a clear and understandable way. The prime objective is to encourage consumers of products and services to understand the environmental impact of their actions and for all waste producers to take ownership of the waste they produce.

3.1.2 It would be helpful to encourage and support the incorporation of sustainability, including waste management as a cross curricular subject in all levels of education. Support for teachers of all subjects with resources and ideas for lesson plans and innovative projects to help raise environmental awareness and inspire participation would be welcome. The aim is to make environmental sustainability an integral part of each subject and ultimately a logical lifestyle choice. Some Education authorities will already have some resources. Therefore it would be helpful to investigate existing best practice in order to perhaps create a London web based interactive educational resource to assist teachers. In this way it could be constantly refreshed with new material and ideas for projects.

3.2 *Item 2 - Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.*

3.2.1 The principle is fully supported. However, in order to achieve the objective there needs to be a clear and agreed baseline. To achieve this there must

be an accurate and acceptable method of measurement that comprehensively covers the full lifecycle of each waste management option and subsets of options. It is evident from the discrepancies in data used in the Mayors first and most recent draft documents that consistently accurate data is elusive. The Mayor needs an objective to create a clear, accurate, comprehensive freely available dataset for waste management options. This must be achieved in order to maintain the credibility and value of the Waste Strategy.

3.3 *Item 3 - Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.*

3.3.1 Again the principle is supported. However, the economics of waste management are often elusive and rarely concrete. Income from recycled material is subject to the vagaries of international and local markets and of course taxation. Income from energy is dependent on a variety of Government incentives. It must also be recognised that current economics of waste are heavily dependent on landfill tax.

3.3.2 The value of reuse and of recycled material depends heavily on the materials they are replacing. More economic certainty and greater incentives could be achieved if the current value of non-renewable resources reflected the fact that their use is not sustainable. There is a strong case for the Mayor to press the Government to raise the cost of non-renewable resources and reduce the cost of labour through changes in the tax system. In this way the economic benefit of improving resource efficiency remains with the UK economy rather than waiting for the laws of supply and demand to hand the economic benefit of rising prices to whoever extracts the resource.

3.3.3 There are also important issues relating to the security of supply of essential resources. Policies should recognise the wider benefits of 'urban mining' of such materials. Careful consideration should be given to the quality of recovered materials and the security of future markets. It should be recognised that current markets such as China may change their quality specifications and align them more closely with European standards. In addition with rapid increases in economic growth and consumerism, particularly in China, they will gradually source their materials from their own waste sources and reduce the level of imported material. It is therefore important to develop markets for closed loop recycled materials closer to home. While this will raise infrastructure issues it should also have wider local economic benefits.

3.4 *Item 4 - Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure*

3.4.1 There are many benefits in managing London's waste within its boundary. However, this objective should take account of environmental and economic

factors as well as the proximity principle. As an example, it may in some cases be advantageous for an AD plant to be sited say on a farm near to London where the gas produced could be piped back to London via the grid, the digestate could be used beneficially as a fertiliser locally on nearby land and the CO_2 used in green houses to produce fruit for the London market. Such a scheme would not only be sustainable but could be more financially viable as the cost of the site may be less.

3.4.2 If recycled material is to be fully processed within London, there will not only need to be a huge infrastructure but reliable markets for the products. Currently large quantities of waste paper are exported to China for processing because the market in the UK is not large enough. Another factor is that the quality of paper arising from comingled collections is perceived by UK and EU paper processors to be too low. If such issues cannot be resolved it could mean that methods of collection would need to be revised to enable processing within the Capital and would need to be addressed in the strategy.

4 Targets

4.1 *Item 1 - To achieve zero municipal waste direct to landfill by 2025*

4.1.1 This is supported subject to the proviso that landfill may be the best environmental and practical option for certain difficult and in some scenarios high carbon intensity wastes.

4.2 *Item 2 - To reduce the amount of household waste produced from 970kg per household in 2008/09 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household.*

4.2.1 This is a challenging reduction target set in the face of an economic model which relies on growth to achieve economic stability. In addition it seems likely that the size of households will reduce in future. Proportionally the amount of waste per person is higher in smaller households and this will affect the level of waste produced in the future and will make the target more difficult to reach.

4.2.2 Waste Authorities have a duty to collect most household waste free of charge. In addition the Mayor and local authorities currently have extremely limited powers in respect to reducing the level of waste produced. Waste Collection Authorities can take action to charge for Schedule 2 waste and can also act to reduce the level of commercial waste leaking into the household waste stream. However, it is not clear from the strategy what other actions will be taken to achieve the target.

4.2.3 There are initiatives that could be taken including the extension of producer responsibility particularly for products designed to be disposable and increasing taxation on resources. These would have a direct impact on the amount of waste produced but the Government would need to be persuaded to take action.

4.3 *Item 3 - To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 40,000 tonnes a year in 2015 and 120,000 tonnes a year in 2031*

4.3.1 This is a very specific target to increase capacity for preparation for reuse. However, it is not clear what action will be taken to utilise the capacity created. There need to be drivers to incentivise reuse and the initiatives referred to in 4.2.3 above could help.

4.3.2 The best reuse is that which occurs outside of the municipal waste stream and action should be taken to actively support and encourage this.

4.4 *Item 4 - To recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031*

4.4.1 Applying the recycling target to municipal waste rather than just household waste is logical. It will encourage Waste Collection Authorities to provide recycling services to their commercial waste customers. This will be particularly beneficial to small and medium enterprises. However, it should be recognised that achieving the targets will be a significant challenge. Waste authorities will need to achieve exceptional participation and capture rates for dry recyclables, kitchen waste and garden waste. If the resulting material is to be fully managed within London there are will need to be sufficient processing infrastructure and markets for the products.

4.5 *Item 5 -The management of London's municipal waste to achieve annual greenhouse gas emissions savings of approximately 1.2 million tonnes of CO2eq in 2015 1.4 million tonnes of CO2eq in 2020 1.6 million tonnes of CO2eq in 2031*.

4.5.1 The general comments in 3.2.1 are also applicable. There is concern about the accuracy, reliability and comprehensive nature of the data used to establish the baseline and to calculate progress. There should be accurate data for all stages and all methods of waste management to enable waste producers to determine optimum solutions and for accurate monitoring of progress towards the targets. The inclusion of all elements such as the impact of collection will help the optimisation of all aspects of the process. The climate change impact of collection often only allows for the energy expended during the collection process but it should also include the embedded carbon equivalents for the vehicle, plant, equipment and containers employed in the whole process. It should also include the associated carbon impact of depots and workshops.

4.5.2 The natural progression is for data to be compiled for resources. It is suggested that the Mayor lobby's the Government to make this a National objective.

4.5.3 It is currently not possible to recycle a significant percentage of plastic waste. Where this waste is directed to incineration processes it contributes heavily to greenhouse gas emissions. Therefore the recycling and sustainable marketing of this element of the waste should be prioritised.

Reducing the carbon intensity of residual waste will make it easier to meet the CO_2 equivalent performance for energy generation from residual waste. In order to achieve this objective it may be necessary to consider the design of the packaging and products that contribute to difficult to recycle plastic waste. There is a strong case to require that products, particularly those with a short life, to be capable of practical and economically viable recycling. This is another area where the Mayor could consider urging the Government to take action.

4.5.4 As recycling rates increase the carbon intensity of residual waste will rise unless mixed plastic waste can be recycled. It will be extremely challenging for waste to energy facilities to meet the efficiency targets with such waste unless the low grade heat can be effectively distributed. If the development of such high efficiency facilities is not possible and effective recycling of mixed plastic waste is not developed landfill may be more carbon efficient than combustion for high carbon intensity wastes.

4.6 *Item 6 - To generate as much energy as possible from London's organic and non-recyclable waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.*

4.6.1 It is felt that this target needs to be clarified to enable it to be effectively monitored and delivered. It needs to be specific about the thermal efficiency to be achieved.

John Pavitt

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The organisation is a trade body for the re-usable nappies industry. It was set up by independent providers and distributors of re-usable nappies to promote awareness of the key benefits of re-usable nappies, which include waste reduction, improved well being for babies and significant cost savings for parents.

Re-usable, or real, nappies are nappies that are washed and re-used, reducing both waste and cost. A recent Mintel report found that 5% of parents chose re-usable nappies.[1] Given the waste reduction that can be achieved through the use of re-usable nappies this means there is a lot of scope to reduce the amount of household waste produced by increasing the use of re-usable nappies.

The benefits of re-usable nappies

Re-usable nappies have many benefits over disposable nappies:

- **Costs to parents**: Re-usable nappies can save parents up to £600 per child[2] compared to disposable nappies. The savings per child can be even greater if the nappies are re-used for a second child.

- **Costs to local authorities:** waste collection and disposal is a significant cost burden on Local Authorities, who spend approximately £22 billion per year on this in England[3], according to figures from the Chartered Institute of Public Finance and Accountancy. Waste reduction, therefore, offers an excellent opportunity for cost savings in local government. This, again, means prioritising waste minimisation and re-use, as the less waste is produced, the less it will cost to manage it. If a 10% conversion rate was achieved across the UK, figures show that this would equate to Local Authority Savings of around £9.2 million per annum.

- **Environmental protection**: Using re-usable nappies, as opposed to disposable nappies, can have a significant positive impact on the environment by reducing the amount we throw away. Nearly 3 billion disposable nappies are thrown away every year – around 8 million per day – making up almost 4% of all household waste, which adds to the UK's landfill site problems.

  There are a number of problems with relying on **landfill** to dispose of waste: it represents an excessive use of land and is a potential source of water pollution; landfill produces environmentally harmful greenhouse gases and accounts for 38% of total methane emissions, and, according to the Environment Agency, the decomposition timescale for some of the materials and chemicals used in disposable nappies is more than 500 years.

  Re-usable nappies can have a much wider positive environmental impact, as shown in the Environment Agency's 2008 revision of their Life Cycle Analysis Report on Nappies. The report showed that re-usable nappies can be up to around 40% better for the environment than

[1] Mintel, Nappies and Baby Wipes UK, August 2010

[2] According to figures from 'What Mums Really Want', commissioned by Lifecycle Marketing, publishers of Emma's Diary, and conducted by independent research company Mum'sViews.

[3] CIPFA Finance and General Statistics 2008-09

disposable nappies.

- **Climate Change**: The fact that re-usable nappies can reduce the amount of material which is put into landfill also has positive effects in helping to reduce climate change due to the reduction in the amount of methane produced.

- **Compliance with EU legislation**: Not only are re-usable nappies more environmentally friendly, but they are also aligned with the priorities of the revised EU Waste Framework Directive – the document which sets the ground rules for waste management across Europe.

  At the heart of the Directive is the waste hierarchy, which the provisions of the Directive state should act as a priority order in waste prevention, legislation and policy. The hierarchy includes 5 priority levels:

  - Prevention
  - Preparing for re-use
  - Recycling
  - Other recovery - including energy recovery
  - Disposal.

  The waste hierarchy calls for waste prevention to be the top priority of Government policy and legislation, with preparing for re-use the second priority. Re-usable nappies prevent waste and are re-used – they can even be kept and used for future children or bought second hand – the two top priorities for waste management. In contrast, disposable nappies are poor fuel for incineration and are therefore mainly disposed of, the last of the options in the hierarchy.

Answers to specific questions

1. What do you think are the key issues that need to be addressed in order to achieve the Mayor's vision for waste management?

The organisation agrees that minimisation should be a top priority in waste management. Waste minimisation has a number of benefits:

- It has a smaller environmental impact than recycling, partly due to the energy involved in transporting goods to recycling centres and then recycling them.

- Preventing waste saves public money at a time of tightening budgets. Recycling, landfill and incineration all have costs associated with them; many of these costs have to be borne by local authorities, especially in the case of landfill. If there is less waste to be dealt with in the first place, this inevitably saves money.

- If the Government truly intends to create a zero waste economy then it needs to avoid the use of landfill as far as possible, with the eventual aim of moving towards a situation where landfill is not used at all. With some kinds of waste there are few other options for disposal as they are not suitable for recycling or energy production. Therefore, the most effective, and least costly, way to significantly reduce the amount that is sent to landfill is to prevent the waste being produced in the first place.

While we recognise the value of recycling, composting, energy from waste, etc for waste that truly cannot be prevented, we should not encourage only these activities without encouraging waste minimisation and re-use.

There should also be recognition of the role that re-usable nappies can play in waste minimisation. Disposable nappies represent up to 4% of household waste, and up to 50% in households where there is one child of nappy wearing age. As they cannot be recycled and tend to make poor fuel for incineration, they tend to end up on landfill sites. Therefore, re-usable nappies can provide an extremely cost effective solution to this problem.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

The organisaton agrees with the objectives set by the strategy, particularly the need to provide Londoners with the "knowledge, infrastructure and incentives" to change the way they manage municipal waste by encouraging waste minimisation, re-use, and recycling and composting.

However, we would be keen to see more detail on how exactly this objective will be achieved. There is a need to be clear in communications with the public about where different activities fall on the waste hierarchy and how their environmental impact differs. For example, many people do not understand the role of waste minimisation and or the fact that recycling has its own financial and environmental costs; they have a tendency to believe that producing waste does not matter so long as it is recycled, when this is not in fact the case.

There is also a need to be careful in the implementation of incentive schemes for recycling, as they can have the result of disincentivising waste minimisation, particularly if they are based on the volume of waste which is recycled, as with the RecycleBank scheme in operation in Windsor and Maidenhead. We would therefore encourage caution before implementing such schemes in London.

Such schemes can actually work to discourage the use of some re-usable products due to the fact that they would not count towards the amount of waste recycled, despite the fact that this is more environmentally friendly, and better meets the priorities of the waste hierarchy set out in the Waste Framework Directive.

In **Windsor and Maidenhead,** households are awarded reward points for recycling. The more they recycle, the more points they earn. Before the scheme was fully rolled out in June 2010, a trial period took place, during which residents in the trial increased their recycling by 35%[4]. This is a positive development, but does not take account of the fact that there would have been a greater environmental impact had products been re-used rather than being put in the recycling bin. The next stage, therefore, in Windsor and Maidenhead should be to encourage re-use alongside recycling as only by significantly greater use of both can a zero waste economy be achieved.

There are also practical steps which can be taken to provide knowledge and incentives for waste minimisation. For example, eleven London Boroughs provide voucher or cash-back schemes for re-usable nappies through the Real Nappies for London brand, which helps parents with the up-front costs (although re-usable nappies save parents money in the long term, they do have some initial start up costs). Examples of how this scheme could be improved include:

[4] http://www.rbwm.gov.uk/web/wm_recyclebank.htm

- The scheme being expanded to more London Boroughs
- Better promotion of the scheme to ensure that *all* new parents are aware of it
- Expansion of the scheme so that vouchers can be used at major supermarkets and other retailers, which would encourage more parents to make use of them.

The use of re-usable nappies could also be encouraged if they were used on maternity wards, rather than the disposable nappies which are used at present, as this would mean that parents realise at an early point that re-usable nappies are not as difficult to use as they may believe. This would also save hospitals money on cost of disposable nappies.

Voluntary organisations can also play a role by helping to ensure that people are fully informed of the financial and environmental benefits of waste prevention. If people are to understand the importance of waste prevention, and the steps which they can take to prevent waste in their own home, then education and information on this issue is vital. A variety of different organisations could have a role to play, including environmental charities, residents' groups, and groups which come into contact with young parents.

3. What are your views on the Mayor's targets for reduction and re-use? Are they achievable, or stretching enough?

It is encouraging to see a specific target set for waste reduction, as this will provide a way to measure the success of policies to encourage waste minimisation. However, the target of a 20% reduction in waste produced by 2031 is very stretching, and concern has been expressed by some stakeholders about whether this can be achieved.

Therefore, it will be necessary for the Mayor and the Greater London Authority to provide support to Local Authorities to help them achieve this target, including by providing them with information on all possible methods which could contribute towards this – including re-usable nappies.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

There are definite advantages to a CO2 equivalent approach to managing waste, as reducing carbon emissions is a key objective of all policymakers at the moment.

However, while we understand the difficulties in including calculations of the carbon spent or saved in waste minimisation and the transportation of waste, it is disappointing that they will not be included. This lack of inclusion is likely to advantage waste management techniques such as recycling, and present an incomplete picture of their carbon footprint, as it will not take into account either the carbon which could have been saved if the waste were prevented in the first place, or the carbon involved in transporting recycled goods.

We are sure that the Emissions Performance Standard model will be refined in the future, and would urge you to consider how these two factors can be included.

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

The recycling targets of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031 are certainly stretching, and some Local Authorities have expressed concern over whether or not they can be met. Our

concern is that, in setting such stretching recycling targets, the focus on waste minimisation as the first priority should not be lost.

Such stretching targets are likely to make the use of cash incentives for recycling more appealing to local authorities, and we would hope that any such schemes are designed in such a way that they do not discourage waste minimisation. It should be noted that, of course, reducing the amount of waste produced would make it easier to recycle 60% of that waste.

15. General comments on recycling and composting

As we have mentioned above, recycling is a good option when waste truly cannot be minimised, as it is better for the environment than sending waste to landfill; however it should never be seen as the first option for waste management. Some products cannot be recycled or even used to produce energy from waste and are almost certain to end up in landfill; therefore if the aim is to achieve zero waste to landfill, then the only option is to prevent the waste from occurring in the first place. Disposable nappies are an example of such products; the vast majority of them end up in landfill, and therefore the best option is to prevent as much of this waste as possible by encouraging the use of re-usable nappies.

This also means that we should not focus on recycling to the extent that messages about waste minimisation are lost.

Type of organisation

- ☐ London Borough
- ☐ Central Government
- ☐ Third sector
- ☐ Private waste sector
- ☐ Other

Please specify

Trade Association

Approximately how many people does your organisation employ?

- ☐ 0-50
- ☐ 51-250
- ☐ 251+

Doug Simpson
Environment Programme Officer (Waste)
Greater London Authority
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14 December 2010

Dear Mr Simpson

Waste Strategies Feedback

The workshop which you organised on 14 December was stimulating and well run. I am writing to provide feedback on the draft strategy documents, and some comments on the notes you circulated on 24 December to participants.

(I am a consultant and include a brief footnote on my areas of interest.)

Purpose of the Strategy Documents. It was stated that they are for companies and contractors involved in the waste industry. If this is the case the documents are much too long. Each strategy should include an executive summary of about 500 words, certainly not more than 1000 words. (The existing summaries are five times too long. Few stakeholders will read them, let alone understand them.)

Surely a strategy is being prepared because it is a fundamental duty of government to identify needs and problems, and devise and present solutions?

Middle management are bound to produce long documents like these two drafts. It is for senior management to whittle down the documents to the necessary brevity and clarity.

Policy 1 and 2 highlight problems but not solutions. Waste producers follow financial and practical incentives. There are two **realities** that the business waste strategies do not seem to reflect.

- The financial benefit of recycling to them is small. It is more important to them to increase their revenues by a quarter of a percent than to recycle. Waste management will (at best) be low down the Board Meeting agenda.
- The manager concerned with waste is a busy man and when he wants advice about waste he wants a 'one stop shop'. If he seeks advice from (say) a composting expert that expert must also be a generalist on other waste, glass, plastics etc and must be well-informed on the practicalities and costs of collection.

Organisation and arrangements GLC Waste Department and LWARB
It is not clear to outsiders how roles are divided between the two organisations.

The GLA (or LWARB) at present do not seem to have a contact point for each waste material or topic, ie someone who looks after the folder of information and provides a corporate memory and focus of knowledge. Fix and mention this in the strategy?

Construction waste.
Much more could be done to ensure that excavated material goes to reclamation. (Does the strategy differentiate between reclamation and landfill? Should it?

At the Workshop it was mentioned that architects should be encouraged to design buildings so that material waste is minimized. Architects are proud people who are already subjected to a great deal of regulation, and I fear the initiative may not be welcomed. May I suggest:

- LWARB could inspire good practice by means of an award scheme to publicize and extol successes, by architects, contractors or others.
- Architects and other professional firms would like to see their names published in a favourable light (and heralded on the LWARB website?).
- There could also be a wooden spoon award.
- Contractors may be involved to a greater extent than designers
- Incentives are already in place. Wasted material is wasted money. Thrifty owners of buildings and their surveyors already seek economical design from architects.

Glass Compaction at source (Bottles).
This is not at present mentioned in the strategy. Surely this type of issue should be? The GLA needs to present a view on this. The facts and factors can easily be set down.

Suggestions for helping large numbers of small waste producers.
LWARB has of necessity concentrated to date on helping a small number of large projects and waste producers. In the years ahead it needs to target much larger numbers of small waste producers. To do so it needs to be able to provide information and access to swift practical inexpensive advice. Case studies and exemplars need to be identified, written up, and heralded.

Conclusions.
- Rome was not built in a day.
- LWaRB has made a good start but needs to redirect its efforts.
- The two strategies need a lot of further work on them to make them comprehensible, credible, practical and effective.

Footnote: It is with three 'hats' that I write:
- My consultancy has a handful of clients with catering waste and we try and persuade them to do more composting and reduce their mixed waste.
- I have an interest in compacting glass bottles at source.
- I am active in local affairs in Hammersmith. I observe that many residents segregate their waste conscientiously but very few of our schools, pubs and restaurants make any effort to do so. Via our residents association I try to exercise influence to remedy this.

The Mayor's Draft Municipal Waste Management Strategy feedback form

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

We fully support the Mayor's vision for London and welcome the strong link made in the draft Strategy between quality of materials, economic value and environmental performance. Currently the UK is too reliant on export markets to accept the lower quality grades of materials produced by our collection and sorting systems. This has major disadvantages: reduced income, no security of markets and loss of employment opportunities in the UK.

Through export of our poorly sorted materials we lose control of these resources with unnecessary loss of value and employment opportunities where there is local demand for these materials if they are clean and useable. For example, 54% of paper and board collected in the UK was exported in 2009 despite unfulfilled demand from UK reprocessors. (Source: *CPI MPs newsletter January 2010*.)

Quality control is most effective and least costly when applied at the point of collection. In many European cities, this is achieved through the provision of a range of bins, one for each materials stream, placed either in communal collection points or in on-street locations. In London the majority of households receive individual waste collection services directly from their property. Because of this we were unable to adopt the European model and collection services for recyclate have diverged into two main systems: those in which householders place materials in a box which is sorted by collection staff on to a multi-compartment vehicle (source separation), and those in which householders place materials in a bin, box or sack which is then loaded on a compaction vehicle and sent to a facility for mechanical sorting (commingling).

Many local authorities in the UK, including over half of the London boroughs, have adopted a single stream commingled collection system in the belief this method would divert the highest quantity of materials from residual waste at the lowest cost. It was believed that we could compromise on quality as there would always be buyers in developing countries willing to accept our contaminated materials. There is now overwhelming evidence that single stream commingled systems:

- Do not divert greater amounts of recyclate than multi-stream and source separated systems
- Are substantially more expensive than other methods, particularly fully source separated systems
- Cannot achieve the quality standards required by the reprocessing sector – almost all UK reprocessors now have problems with materials supplied by MRFs from single stream commingled collections and report high levels of wastage that are not captured in the recycling performance figures reported to Waste Data Flow
- Are producing increasing quantities of low quality materials creating a serious risk that they will not find a market at all and will end up in landfill (see recent Institution of Civil Engineers report *State of the Nation: Waste and Resource Management*).

The ICE report suggests that '*local and central government should work with all interested parties to produce a series of output-based protocols'* thereby lending support to a proposal that UK reprocessors and those concerned with material quality, including ourselves, have been in favour of for some time.

Commingling is already 60% more expensive per tonne than source separation (*WRAP findings quoted on page 63 of the draft Strategy*) so investment in better sorting technology can only widen this gap and can still never approach the quality achieved through source separation.

We believe the solution is not to invest in more, and more expensive, sorting technology but to invest in better collection systems. An alternative solution, developed here in the UK in response to our specific local needs, is the use of multi-compartment stillage vehicles, which are used to sort recyclables from a box at the point of collection.

Stillage vehicles are inexpensive, robust and fuel efficient vehicles and the latest models facilitate the collection of a much wide range of materials, including food waste, plastic, cardboard, batteries and textiles in addition to paper, glass and cans, all collected on a single visit on one vehicle. It is just as convenient for the service user because the sorting is done by trained staff on the vehicle, not in the home.

We find it difficult to reconcile the draft Strategy's support for systems that "*maintain the best possible prices, highest quality use, and maximum resilience to market fluctuations*" (page 14) with the support being provided by LWRB for commingled collections through funding for MRFs (£8m). We would question why funding support is being given to new MRF facilities given that:

1) there is already an oversupply in the capital and
2) commingled collections have been demonstrated to be significantly more expensive and less environmentally effective than alternative methods.

We welcome the quality theme that runs throughout the draft Strategy, which recognizes the value of the embedded energy that is saved through closed loop recycling. We would like to see a commitment to the design of better collection systems that prioritise quality outputs as the means to achieve the potential environmental and economic benefits described in the document.

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

Understanding flats and apartments

We completely agree that some housing types, particularly high rise flats, need more investment and a wider range of services. However, the scale of the challenge is not as great as could appear from the document. The information provided on page 41 states that approximately 40 per cent of municipal waste comes from flats and estates and page 114 states that flats only recycle or compost about 5-10 per cent of the waste they generate. However, Figure 1 in "Appendix 4a cont" shows that less than 17% of London properties receive a communal collection which we take to be predominantly medium to high rise blocks. We assume, therefore, that page 41 includes all types of flats whereas page 114 is referring to tower blocks.

The percentage of waste set out by households in highrise flats for recycling and composting may be somewhat higher than 10%. The company, through its active R&D function, constantly collects data in order to inform our strategies and proposals. In our experience, highrise flats generate less total waste per household than most other housing types which needs to be taken into account when estimating recycling and composting rates.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

Our response is included in Question 13.

4. What do you see as the key considerations for developing a successful London-wide reuse network?

Our response is included in Question 13.

5. Do you have any suggestions of businesses that might mentor small businesses to improve resource efficiency?

6. Any further comments on this policy?

Cost of municipal waste management

Page 32 states that the 2008 baseline for the number of households in London is 3.2 million.

Page 60 puts the total cost to London of managing its municipal waste at £580 million.

This means that the average cost per household is £181.25 per annum, which appears high to us. Does this include street cleansing operations perhaps? We would expect the average cost per household for residual waste, food waste and recyclate collections, RRC operations and waste disposal to be closer to

£100 - £120 per annum, suggesting there are huge savings to be made through better system design over and above those already identified in the draft Strategy.

Inflated whole system costs are often caused by adopting a 'disposal-led' approach to waste management which relies on pre-treatment to divert waste from landfill and fails to exploit the potential for diversion from activities higher up the waste hierarchy. As a result, sorting, treatment and disposal costs are incurred which could have been designed out at the collection stage at lower cost.

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

Recycling and composting
This is an excellent approach to measuring the efficacy of different waste management strategies and one that the company has employed for a number of years. Providing local authorities with a calculation of carbon costs (predominantly from vehicle movements) against carbon savings not only allows our clients to compare different strategies but also reveals the scale of the carbon savings actually achieved which is usually around 25 – 30 times the carbon costs. If this information is communicated effectively, households participating in recycling and composting services can see that they are achieving a measurable reduction in their personal carbon footprint with minimal effort and without any reduction in their standard of living.

A major consideration, however, is that, as the Strategy states on page 95, "*waste authorities are often not fully aware of the final destination of materials collected for recycling and reprocessing".* In the absence of this information, it is impossible to calculate the carbon savings achieved. The CO_2eq approach, therefore, is dependent on materials being supplied to bona fide reprocessors who provide audited reports on the environmental performance of their processes if it is to be instrumental in channelling materials through "*routes which deliver the greatest CO_2 savings*".

We would like to see the Strategy state explicitly that materials with no known and verifiable destination cannot be credited with achieving CO_2 savings. This in turn will help to bring into effect one of the major themes of the Strategy concerning quality of material making it "*a commodity that is more desirable to the re-manufacturing sector"* and providing a welcome boost to many UK reprocessors concerned about loss of resources to a) operators in the Far East that do not adhere to the same standards of accountability and transparency and b) end uses that do not generate any environmental benefits (such as poor quality glass used as aggregates).

Another consideration, which will ultimately determined whether this approach achieves its objectives, is the underlying assumptions used which are to be based on the WRATE tool. For example, WRATE assumes that all collection vehicles produce the same quantity of emission whereas in fact the stillage vehicles deployed on source separated collection services have a much lower production carbon cost and consume around one third of the fuel used by standard refuse collection vehicles. We would ask the Mayor to ensure all underlying assumptions are transparent and open to challenge in order to avoid perverse outcomes. The workshops for waste authorities mentioned on page 99 of the draft Strategy could perhaps be extended to private contractors to facilitate this.

Energy generation
The CO_2eq approach is also a useful measure of how well energy recovery processes perform; i.e. how much energy is actually recovered compared to recycling and composting. As the draft Strategy makes clear on page 117, "*in most case recycling and composting does perform best in economic and environmental terms*"; even the most efficient recovery operations, with full utilisation of heat generated, can only ever recover a fraction of the embedded energy that can be saved through recycling and composting.

However, the sentence continues "*where energy generation performs better in environmental terms (achieves greater CO_2eq savings) than recycling, cost should be the deciding factor*." Our question here is – at what point in time? It is likely that the reason why energy generation would perform better would be lack of collection and/or reprocessing infrastructure and this is a temporary situation, particularly in the context of a plant with a 25+ year life expectancy.

Risk of overcapacity

Local authorities are under pressure to divert a much higher percentage of their waste from landfill and are developing a growing awareness that providing comprehensive collection services not only achieves this objective, but also generates significant savings in overall waste management costs. Specifications on new contracts almost invariably demand a collection service for recycling and composting that targets 80% - 90% of all household waste arisings.

Any analysis of the environmental performance of energy recovery compared to recycling and composting, therefore, should be based on the whole life of the proposed development, taking into account that over the coming years most, if not all, collection services will target the same comprehensive range of materials. The exceptions to this trend will be those authorities that have long term minimum tonnage guarantees to supply an incinerator or treatment plant and are unable to realise the cost savings available through recycling and composting.

The risk of overcapacity undermining the environmental and economic performance of waste management systems is already evident elsewhere in the UK and Europe.

- Waste management company, Veolia, is currently seeking a variation to its planning application to allow it to take waste from surrounding areas to feed its incinerator in Sheffield due to the increasing amount of waste diverted through recycling and composting.

- The introduction of new collection services in Bridgend has achieved a 57% reduction in residual waste resulting in under supply to the Council's energy recovery facility. The spare capacity is now being offered to other authorities.

- Germany is reporting a general overcapacity in incineration and is seeking to source residual tonnage from abroad to make up the shortfall.

- Denmark, once a model for a recycling society, has peaked at 50% recycling due to its sunk investment in waste combustion.

- Waste consultancy Eunomia recently presented findings on waste infrastructure to the Associate Parliamentary Sustainable Resource Group. They calculate that UK-wide, if all waste treatment projects with planning permission went ahead, only 7 million tonnes more capacity would be needed to meet our needs in 2020, and far more than this is already under consideration by waste firms.

This point is taken up on page 49 of the draft Strategy: "*The economic modelling suggested the collection and recycling or treatment of source separated wastes (such as the collection of food waste for treatment by AD) can be less expensive than residual waste treatment. This needs to be taken into consideration when developing new infrastructure to strike the balance between recycling, pre-treatment and residual waste infrastructure to avoid over-capacity*."

This recognises the importance of avoiding a situation that effectively caps the tonnage of waste that can be cost effectively dealt with higher up the waste hierarchy due to the development of treatment facilities based on outdated projections of future waste flows.

The Mayor's proposal to create a market in waste treatment facilities goes some way to reduce this risk as it frees waste authorities from the need to commit future residual waste tonnage in order to procure treatment capacity. The risk could be further reduced by expanding the definition of zero waste to limit the amount that can be sent to energy recovery in line with anticipated reuse, recycling and composting targets.

We believe that a 'zero waste economy' should be understood to mean that all waste is dealt with in accordance with the waste hierarchy and not simply 'zero waste to landfill' as this undermines the waste hierarchy and serves only to drive systems as far as the next level. The draft Strategy recognises that it is inefficient to recover energy from materials that could be recycled or reused. A broader definition of zero waste would help to focus waste management activities on resource recovery, not landfill diversion.

There are also two areas of the draft Strategy that we suggest could be amended and clarified:

1) page 48: "*the greatest savings come from reducing the amount of waste sent to **landfill***" should read "*the greatest savings come from reducing the amount of **residual waste***". All residual waste options are expensive, not only landfill;
2) page 52: "*Demand for thermal treatment capacity is expected to decline **from** 2025 as recycling and composting performance increases, reducing the quantity of mixed waste requiring treatment*". Surely demand is expected to decline well **before** 2025 given existing trends and the impact of this Strategy?

Carbon neutrality and biomass

In energy conversion systems, carbon neutral is a term often applied when biomass is used to generate heat and/or power because the CO_2 released through combustion is the CO_2 absorbed during growth. This is a valid description, albeit not entirely accurate as it does not account for the energy used during planting, harvesting, processing and transport and to produce fertilizers and pesticides.

On pages 53 and 131 of the draft Strategy, this term is applied to food waste which in this context is understandable as food waste is pure biomass. We do not, however, recognise the term as applied on pages 39 and 137 to energy recovery. This seems to propose that it is acceptable for energy recovery from waste to be as carbon intensive as energy generated from fossil fuels, thereby achieving no net carbon reduction other than avoided methane emissions from landfill. As most methane emissions from landfill are either flared or captured, this appears environmentally ineffective with the principle benefit remaining the diversion of waste from landfill in order to comply with Landfill Directive targets rather than achieving any real environmental gain. We are not sure that whether we have understood this correctly.

Elsewhere in the document the role of biomass in reducing CO_2 emissions is highlighted, for example page 58 states that "*producing SRF with a high biomass content achieves the greatest CO2eq savings and opportunities for securing ROCs*". On page 98, pre-treatment is proposed to refine the input waste to increase the level of biomass of the output SRF to meet the minimum CO_2eq performance. This section then advises that waste authorities "*need to focus on targeting higher CO2eq impact materials such as plastic and textiles in their recycling collection systems to reduce the non-biomass content of residual waste for energy generation*". This appears to recommend a disposal-led strategy which, as discussed in Question 6, inevitably leads to higher costs and sub optimal outcomes. Is the draft Strategy proposing that collection system should be designed to benefit energy recovery despite the significantly greater cost savings and environmental benefits to be achieved through recycling and composting compared to even the most efficient energy recovery operation?

Performance offset for AD

We do not fully understand the proposal that "*waste authorities sending organic waste for AD will be able to offset its CO_2eq performance against meeting the CO_2eq performance for energy generated from residual municipal waste*" (page 99). This seems to suggest that there is a CO_2eq performance standard that can be met but which is to be relaxed for those authorities that are sending organic waste to AD – we expect this to be the majority within a few years. As plants that generate energy from residual waste remain in operation for decades we believe only the very best designs and most efficient technologies should be permitted to serve London regardless of the performance of other activities that make up the wider waste management system.

8. Any further comments on this policy?

9. What do you think are the key issues in establishing joint procurement contracts for waste authorities?

There are two proposals in this section of the draft Strategy – joint procurement through partnering with neighbouring authorities and centrally procured framework contracts.

Joint procurement through partnering:

We agree that there are economies of scale to be achieved through partnering and have seen this on large scale contracts that we operate elsewhere in the UK. However, there is a limit to the efficiencies that can be made; the Kelly Review looked at this issue in 2005 and observed the gain was only found for aggregation up to a total of around 70,000 households and thereafter unit costs did not improve. Waste

authorities should therefore have a clear idea of the benefits they are targetting through partnering and ensure that the resources needed to achieve those benefits are in place ahead of procurement.

Consideration should be given to a number of issues including:

- Co-operative working arrangements – a number of authorities that have attempted to undertake joint procurement of waste management contracts have failed due to underestimating the resources and costs involved in consulting and negotiating with partners and keeping all parties informed of progress throughout the procurement process.

- Allocation of costs – cost per collection varies according to mutiple factors such as housing type, accessibility, density of housing and traffic conditions and it can be difficult to identify the rates attributable to each partnering authority. This is relatively easy to disentangle on a static contract; however if a menu of options is required that may or may not be taken up by one or more of the partners, costs soon become dependent on the action taken by all the other partners and the potential outcomes can multiply to a level of complexity that undermines the procurement process.

- The terms and conditions of transferring staff - as much as two thirds of the cost of operating a typical waste collection service is made up of staff costs, with vehicle, depot, container purchase, management and back office costs making up the other third. If employees on a range of terms and conditions are co-located at one central depot, a multi-tier pay structure is created that can damage moral and employee relations. The partnering authorities may prefer to harmonise terms and conditions but should be aware that this is likely to swallow up most of the cost efficiencies achieved through partnering.

- Autonomy of service design – in order to achieve economies of scale, partners may have to compromise on service design. It is clear from the draft Strategy that the Mayor supports a move towards provision of similar services across the city. This is a seemingly attractive proposal but will incur costs if existing infrastructure needs to be replaced in order to bring services into line with a single service model.

  The freedom of local authorities to implement different collection systems encourages innovation in service design and allows for evaluation and comparison of different service models. There is a danger that too much emphasis on standardisation of services could lock local authorities into a sub-optimal system and restrict their ability to innovate and to tailor services to suit local needs. We would prefer the emphasis to be on standardisation of service levels rather than the methodology employed.

Framework waste contracts
Many of the points above made regarding allocation of costs would also need to be considered in the context of establishing framework waste contracts. Staff costs, depot provision, housing density, distance from collection rounds to waste treatment facilities, even the amounts and types of waste generated, will vary from borough to borough and will change continuously over time.

The draft Strategy indicates that more detailed information will appear in the LWRB 2011/12 Business Plan; it is therefore difficult to comment further on this proposal at this stage.

10. What support might waste authorities most need from the Mayor in order to deliver and operate their own waste facilities?

Revenue from material sales
We recognise that the proposal to help boroughs run their own facilities is intended to ensure that they benefit from the revenue generated from materials sales. However, we would like to take this opportunity to explain that contractors providing source segregated recycling collection services do not keep the value of materials; the source segregated business model is built on maximising materials income and offsetting this against the costs of collection. This is why it is so much more cost effective for local authorities to provide a source segregated collection service rather than a commingled collection service – and, again, it is just as convenient for the service user because the sorting is done by trained staff on the vehicle, not in the home.

As a private contractor, the company negotiates best prices for high quality materials from UK reprocessors, estimates the tonnages to be achieved in each material category and offsets the anticipated income against our contract price. We are then fully incentivised to drive up performance and exercise tight quality control at the point of collection to ensure we realise the income that we have already passed on to the authority in our bid. Nevertheless, some authorities prefer a revenue sharing arrangement which is built in to several of our contracts and also works extremely well.

Council owned and operated sorting facilities
If the recycling collections are undertaken by a private contractor and delivered to the local authority for sorting and onward sale, the collection contractor incurs no risk on the quality of the materials collected. To address this problem, the collection contract would need to include strict contamination thresholds above which penalties would be applied, plus an effective means of measuring contamination in loads delivered to the facility.

Depot ownership
A key factor that determines the degree of competition among contractors for waste management contracts in London is ownership of land for a depot. If none of the bidders owns a depot or the local authority provides a depot, competition will be strong. If, however, one bidder owns a suitable depot, it will have a significant competitive advantage, which will seriously affect the interest and level of engagement of all other bidders. Competition could therefore be enhanced through a reversal of the trend for local authorities to dispose of assets that could be used as depot facilities.

11. Any further comments on this policy?

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

Service design
The majority of recycling and composting services, particularly those offered to low rise households, are quite straightforward. Residents are asked to place their materials in a box or a bin and to place this outside their property on the day of collection. Difficulties can arise if residents do not have enough container volume, storage space or if they are unsure which materials can be accepted.

<u>Containment volume</u>
Containment should reflect the volumes of recycling and composting that the service is designed to achieve. For example:

2 x 55 litre boxes collected weekly = 110 litres per week
1 x 25 litre food waste bin collected weekly = 25 litres per week
1 x 180 litre residual waste bin collected fortnightly = 90 litres per week

In this example, the provision of 135 litres of recycling and composting containment alongside 90 litres of residual waste containment reflects the expectation that 60% recycling and composting will be achieved through the service arrangements. Resident have sufficient recycling and food waste containment to fully participate in the service and are encouraged to do so by the limited containment available for residual waste.

It should be noted that households tend to fill up the space available for residual waste. We serve neighbouring authorities with identical services with only one difference – the size of the residual bin. The authority using 240 litre residual bins collects 20% more residual waste than those with 180 litre bins.

<u>Knowing which materials to recycle</u>
Resident do get confused sometimes about which materials they should put out for recycling, particularly which plastic items, as schemes vary depending on the markets identified for this complex material stream. A box based source separated system addresses this problem simply and efficiently; the collection staff simply leave any items not currently included in the collection scheme in the box with a polite pre-printed card stating why.

Storage
Using boxes facilities a source separated collection scheme which can be provided on a weekly basis for less than the cost of a fortnightly commingled service, reducing the space required inside the home for storage.

Boxes are also more versatile than wheeled bins for recycling. They can be stored indoors or outdoors and can be stacked to save space.

Flats
The draft Strategy makes the point that households living in highrise flats achieve a much lower recycling rate than those with individual collections and suggests that a 'dirty MRFs' solution might be considered for this property type (page 117). We believe this should be avoided in the interest of:

- Providing equality of service provision
- Consistency in maximising the value of our waste
- Education about the value of recycling and the high cost wasting materials

Dirty MRFs salvage very little of value and we believe investment in collection infrastructure and services would achieve better and more cost-effective outcomes.

Flats recycling offers an opportunity for collection systems that are closer to those employed in other European cities whereby single material bins are collected on different days of the week. In the UK, we often use three of five compartment vehicles in order to reduce the number of traffic movements needed to service these properties.

However, services to flats have not kept pace with improvements in doorstep recycling and consequently considerably less is being spent per household on flats recycling and correspondingly more on waste disposal. Doorstep services to low rise properties often include free garden waste collections paid for through Council Tax receipts, making the gap in service provision even wider.

The best performing services are those that engage with landlords, agents, caretakers and residents to site and size containers and adjust collection frequencies to maximise the often limited space available. This demands a sustained effort on the part of local authorities and their contractors, with specialist waste teams often best placed to carry out the survey and communications work. However, given the disparity in service provision and spend per household, we believe this is justified and will ultimately be cost effective.

Transparency and reporting
Many residents are still not entirely sure about the benefits of recycling, which means they do not get the satisfaction from participating in the service provided that they would otherwise feel. Media reports of UK waste discovered in landfills in developing counties undermines the ethics and appeal of recycling.

We therefore welcome the commitment to quality evident in the draft Strategy as this has the potential to re-establish public confidence and encourage more engagement in recycling. The CO_2eq approach will ensure that local authorities and contractors are more conscious and more transparent about where materials are sent, how they are processed and what they are ultimately used for.
Local authorities in London could consider adopting the initiative instigated by the Somerset Waste Partnership by providing an End Use Register detailing tonnages, end uses and carbon savings achieved through recycling and composting. This would provide useful feedback to residents participating in recycling and composting collection services, and would encourage all parties involved in handling the materials to be transparent and accountable.

Standardisation of services
The draft Strategy states that some residents complain that variations in services cause them a degree of confusion. It is true that there has been a great deal of variation but this is now rapidly converging as new contracts generally specify a full range of materials to be collected. There is still some variation on the range of plastics collected but this is due to lack of processing facilities which the draft Strategy addresses through proposals for a closed loop mixed plastic recycling plant for London (page 106).

Whilst the materials collected are becoming standardised, collection systems remain diverse. As discussed in Question 9, we believe that retaining the power to tailor local services and, importantly, to innovate is

essential to driving improvements in quality and performance. Through the distinctly individual approach taken in the UK to service design, we have developed services that suit our housing types and lifestyles (for example, many European cities do not provide doorstep collections) and are now outperforming many of our European counterparts through collection policies such as source separation, food waste collections and reduced frequency residual waste collections. We would like to see new ideas continue to flourish in London and care taken not to stifle innovation by locking our services in to a 'one size fits all' model, particularly those based on adopting capital intensive technology designed for different environments to our own.

Incentive schemes

Incentive schemes are a hot topic at the moment and appear to offer a win-win solution for both residents and local authorities. However, this approach does raise a number of questions such as - Is it necessary? Is it fair? Is it cost-effective? Does it send out the right message? We would like to suggest that a cautious approach is taken to such schemes as there are a number of limitations and potential risks to consider.

Rewarding the correct use of waste collection services could undermine a culture of personal responsibility to the wider community and it exaggerates the effort involved. We would not, for example, tackle street litter by rewarding those who use litter bins and abolishing powers to fine those who do not. The vast numbers of people who already recycle diligently, motivated by the good of the community and not for personal gain, could become discouraged by learning that residents elsewhere are being given what are purported to be substantial rewards and could start to question why they are not being 'paid' in the same way. We hope that if more of these schemes are to be introduced they will generate benefits for the community or local charities rather than individuals.

The number of local authorities now achieving upwards of 50% recycling and composting rates clearly demonstrates that incentives are not necessary to drive up participation. The best performing schemes are successful because of service quality and design - weekly dry recyclable and weekly food waste collections combined with fortnightly residual waste collections have been proven in both rural and urban environments to achieve that highest recycle rates and lowest residual waste, while dramatically reducing costs.

The schemes currently managed by RecycleBank do not offer value for money for a number of reasons:

- Local authorities do not gain any financial benefits from increasing recycling. The savings realized through reduction in residual waste treatment costs are used to offset the costs of the scheme rather than benefitting the local authority directly, as should be the case.

- The system is expensive, necessitating purchases of weighing technology and new bins with chips fitted (ca. £20 per bin x 100,000 households = £2 million pounds). This is in addition to the estimated £6 per household per annum it costs to actually run the scheme which amounts to nearly £20 million per annum if scaled up across the whole of London.

- The rewards themselves are questionable. Residents are not really offered free vouchers. They are offered vouchers along the lines of "£5 off when you spend £50" which is clearly a very standard marketing ploy. The consumer taking up this offer is just as likely to be £45 worse off instead of £5 better off.

- The benefits of the system are not proven. For this to happen, the performance of the systems in operation needs to be transparent and auditable, with particular attention paid to measuring any increase in contamination and the impact on residual waste tonnages. This information is currently not being made available.

- The system is open to abuse. It is simply not possible to quality control materials presented in a wheeled bin for health and safety reasons. Rewarding by weight makes the system even more likely to attract items that should not be in the recycling bin.

We understand that alternative schemes are being considered, such as those that involve rewarding reductions in residual waste and those that reward communities rather than individuals.

A community based incentive scheme designed to drive up recycling performance in high rise flats does have potential. Measuring performance on a site by site basis would be less intrusive than measuring at an

individual household level and would enable feedback to residents about how much reward they have collectively generated and how it will be used. Nevertheless, this is still an expensive way to influence behaviour and there are other less costly options available.

We hope the Mayor will encourage local authorities that are investigating incentive schemes to look carefully at the investment and operating costs and to undertake a full appraisal of all options available that would meet their objectives before committing to a reward-based incentive scheme.

13. What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?

Reduce waste arisings from 970kg/phh/pa in 08/09 to 790kg/phh/pa by 2031 (20% reduction)

We believe that more can be done sooner to reduce overall waste arisings.

Separate weekly food waste collections

We have been measuring the impact of separate weekly food waste systems since we first introduced them in 2003/4. Our findings have since been confirmed by independent studies undertaken by WRAP and others. The key finding is that the amount of residual waste reduces by more than the amount diverted into the food waste collection and recycling. We have eliminated moisture loss as a significant factor and believe that a fundamental change in behaviour takes place with the introduction of a separate weekly food waste collection whereby participating householders become more aware of the quantity of the food they waste and the proportion of this that was actually avoidable (as opposed to unavoidable waste such as bones and peelings). As a result of this, many householders modify their purchasing habits reducing their avoidable food waste along with the packaging in which it is contained.

Fortnightly residual waste collections

A comprehensive weekly recycling and food waste service targets 80 – 90% of all household waste. It is therefore entirely appropriate and acceptable to reduce the frequency of the refuse collection to fortnightly or less. This sends a strong message to residents about the importance of recycling and encourages full use of the recycling and composting services available.

Combined effect

There is a great deal of evidence – for example in Somerset, Bridgend, North Somerset, Bexley and Cotswold - that source segregated weekly food waste collections together with fortnightly residual collections result in a reduction in residual waste of between 50 and 60% of which around 20% has disappeared from the system altogether. A major reduction in waste arisings, therefore, can be achieved by these measures alone leaving scope to meet and exceed the 20% target put forward in the draft Strategy.

Households not suitable for wheeled bins

We have recently implemented fortnightly residual waste collections in an area where most properties are not suitable for wheeled bins, using sacks instead. Alongside a comprehensive weekly recycling collection and food waste collection, the service has been well received and it performing at the same levels as other similar services that use wheeled bins. This may be of particular interest as it suggests that there is scope to implement fortnightly residual waste collections to an even larger percentage of households than is modelled in the Appendices.

Garden waste

As the draft Strategy points out on page 34 "*many outer London boroughs have benefitted from organic waste collection services to boost their overall recycling and composting rates*". Often these are free, universal garden waste collection services which attract more waste into the system than existed previously. The costs are relatively high, the environmental benefits questionable and local authorities are permitted to report a seemingly high recycling and composting rates achieved through means that are not available to more urban authorities.

A better approach to garden waste collections is to make a small annual or per collection charge. This restricts use while continuing to provide an affordable service to those that need it. It also encourages more home composting and reduces overall waste arisings.

Increase reuse from 6,000 tpa in 08 to 40,000 tpa in 2015 to 120,000 tpa in 2031

This is a challenging target and we cannot authoritatively comment on its achievability. However, we can comment that it can only be achieved by taking a much longer term approach to funding and growing the necessary capacity. Reuse organizations are usually reliant on short term funding, with all the uncertainty and burden of reporting this entails. Longer term arrangements would enable the reuse sector to build infrastructure and capacity and to develop a range of services. The draft Strategy reports (page 20) that the London Waste and Recycling Board is already making investments to help increase waste reuse. We welcome this investment and the ambitious target set for reuse activities.

Recycling/compost 45% by 2015, 50% by 2020 and 60% by 2031

How far can we go? The company operates a number of waste collection systems similar to the Bexley service design and is achieving 65% recycling and composting rates with this model. Fortunately, Bexley has proved that weekly box collections for recycling and weekly food waste collections, together with fortnightly residual waste collections can also be highly effective in London – in fact it is the highest performing system in use here.

This means that all households with individual collection points can easily recycle or compost as much as 70% of their waste and this service pattern can be rolled out relatively quickly.

The average is brought down by non participants and households with communal collection points (and of course is affected by RRC performance, street cleansing arisings etc). We strongly agree with the draft Strategy's proposal that services to flats should be as good as those offered to households with individual collection points. Communal collection points are ideal for siting a suite of collection containers, clearly labeled or colour-coded to avoid confusion. We recognize that space is often limited and that determining the optimal container size and collection frequency requires investment in surveys and consultation with stakeholders. However, it will be more equitable and ultimately more cost effective and environmentally beneficial to provide the infrastructure and services necessary to match the range and quality of services provided to low rise properties.

On this basis we find the targets a little under ambitious and think that 60% by 2020 and 70% by 2031 is stretching but achievable.

14. **What specific role do you think the Mayor has to play in improving recycling across London?**

15. **Any further comments on this policy?**

16. **Do you think the London should be working towards a vision where it manages most of its waste within its boundaries?**

We would like to see a clear indication of when this has been achieved – it is similar to the question, "when does a waste cease to be a waste?" Does a tonne a paper that has been collected and sorted within London count as 'managed' or must it be sent to a London paper mill for this to happen? The draft Strategy proposes support for a closed loop recycling plant for mixed plastic, for example, but it is not clear whether this will be limited to a polymer and colour sorting operation or whether it will include additional reprocessing stages.

If the objective is to reduce transportation costs and emissions, then avoiding the need to export low quality materials to the Far East through employing better collection systems would have a far greater impact than, say, insisting that all food waste should be processed in AD plants located within London. The same farms that supply London with food may be able to achieve a higher gas yield (through mixing with farm slurry) and be able to use the solid and liquid products directly on their own land.

London should be responsible about dealing with its waste and should seek to maximise its value, but we do not think it is advisable to employ the principle of managing within our boundaries too rigidly if there are sound economic and environmental reasons to consider alternative solutions.

17. **What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?**

18. **Any further comments on this policy?**

19. **What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?**

20. **What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?**

21. **Any further comments on this policy?**

25. **Type of organisation**

- ☐ London Borough
- ☐ Central Government
- ☐ Third sector
- ☒ Private waste sector
- ☐ Other

Please specify

_____

_____

26. **Approximately how many people does your organisation employ?**

- ☐ 0-50
- ☐ 51-250
- ☒ 251+

Thanks for taking part!

AMDEA™
The Association of Manufacturers of Domestic Appliances

Draft Waste Strategy Consultation
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14 January 2011

Dear Sir/Madam

Mayor's draft Municipal Waste Management Strategy

AMDEA is the UK trade association for large and small domestic appliances; heating; water heating; floor care and ventilation. We represent manufacturers at UK, European and International level; with government and EU political institutions; in standards and approvals; with non-governmental organisations; with consumers and in the media. AMDEA protects and promotes its members' interests in all these fields.

All our members are fully committed to reducing waste and encouraging recycling but we have some member companies with a particular interest in the segregation of food waste as they manufacture domestic food waste disposers (FWD). FWD can grind practically all food waste into minute particles that are easily carried away by the wastewater system, directly to wastewater treatment where the majority of sludge is treated by anaerobic digestion. We are aware that one of our member companies has submitted a detailed commentary on the draft strategy and we fully endorse this.

While AMDEA's main interest in this strategy is the food waste aspect, our members' products are also subject to the WEEE (Waste Electrical and Electronic Equipment) Regulations and it is possible that impending changes to these Regulations will have an impact on Local Authorities. In these times of severe reductions in funding for public services it is important to understand the implications for the domestic waste stream and for consumer attitudes to recycling.

We have commented on those questions that we feel are most pertinent to our industry.

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1. What do you think are the key issues that need to be addressed in order to achieve this vision?

It is essential to learn lessons from other large municipalities that are currently at the forefront of waste management innovation while appreciating that London is a very old and densely populated city with ageing infrastructure.

In terms of household waste collection there are two key issues: the difficulties faced by residents in high rise or terraced properties with limited waste storage capacity and the difficulties faced by Local Authorities with limited budgets, increasingly onerous targets for waste segregation, public health commitments and political pressure to deal with what is arguably the most important service that they provide to their taxpayers.

In order to enable participation by the maximum number of Londoners the options have to be simple and convenient with minimal impact on residents' lifestyles if they are to be successful. Promoting separate kerbside collection of food waste is difficult as householders are unhappy about storing food waste inside the house yet may have no storage capacity outside. This is exacerbated by those boroughs that have fortnightly collections, particularly in the light of recent adverse publicity about urban foxes and other threats to public health.

At the end of 2010 we saw major disruption of domestic refuse collection in some areas with some collections suspended for several weeks. Fortunately the health risks were mitigated by the severe temperatures which caused the problems but nonetheless putrefying food waste attracts vermin in addition to breeding bacteria. Persuading householders to participate in separate kerbside collection of food waste requires more frequent collection - in some areas of Barcelona, household waste is collected daily, while parts of Somerset cope with a weekly food waste collection that has a relatively good take-up but is not feasible in more densely populated areas. Additional kerbside collections congest residential streets with heavy goods vehicles, generate polluting emissions and increase fossil fuel consumption - in some London Boroughs the waste is transported considerable distances, adding to these effects.

We agree that consumers should be encouraged to reduce the need for disposing of unused food but there will always be a residue and it is vital that London has policies to manage this waste stream. In addition, food waste has potential value - the organic matter can be retained and treated for re-use in agriculture as well as being a valuable source for renewable energy.

Where storage space is limited and collection infrequent, one approach is to remove food waste from the household waste stream at source. A domestic food waste disposer can be a valuable tool for residents wishing to maximise their recycling options. They are a simple and environmentally friendly way for residents to segregate virtually all food waste in their kitchen and are an attractive option for those who struggle with waste segregation (those in high rise buildings, the elderly, infirm, busy, without storage space or just not interested).

One aspect of London's population is that it is highly mobile so even if a resident in one Borough is a committed waste segregator, if they move to another Borough they face a different scheme with different collection schedules and segregation regimes. And the new resident in the vacated property will face the same issue. However FWD units once installed will last at least a decade and remain installed when tenants or owners move. Their performance does not deteriorate with age and they are themselves 95% recyclable.

The addition of food waste to the wastewater system increases biogas production and enhances the nutrient content of organic fertiliser. By weight, AD is the most common method of treating sewage sludge. The fertiliser nutrients contained in the food waste are retained in the digestate, the majority of which (over 85%) can be recycled as nutrient-rich soil improver.

2. Do you think these are the correct objectives, is there anything additional that the Mayor should be focusing on?

We support these objectives but would emphasise the desirability of maximising use of existing infrastructure (such as the sewerage system) and avoiding the carbon impact of further construction of energy hungry processing plants. Transporting food waste via the sewer system to existing waste water treatment works with their established anaerobic digestion plants eliminates the need for additional construction, as well as road transport. The majority (by weight) of London's sewage sludge is already treated by AD and that proportion is increasing.

A particular example of a successful approach to domestic refuse collection is Surahammar in Sweden where the municipality has saved on costs of kerbside collection, transporting the waste to a treatment site, and waste treatment, while the waste-water treatment plant has incurred no extra costs; the biogas output has increased by 46%; and the sewage system has recorded no increase in odour, blockages, or build up of fats, oils or grease. Overall Surahammar's waste strategy has decreased the tonnage of waste to landfill from 3600 tonnes in 1996 to 1400 tonnes in 2007.[1]

With reference to encouraging the re-use of items, while we support the concept we are wary of encouraging refurbishment and re-use of electrical appliances. We are concerned about the implications - not only the safety aspects but also the desirability of prolonging the life of items that use a lot of energy. In the past 10 years the energy efficiency of many large domestic appliances has improved to such an extent that a 10 year old fridge freezer will use at least twice as much electricity as a modern one. It is actually better environmentally to dispose of this appliance via a WEEE processing station rather than to continue its use. There are also particular issues around the environmental impact of older refrigerant gases where appliances may be damaged.

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

The targets are ambitious but potentially achievable if policies are sufficiently adaptable. However, individual Boroughs already have widely divergent policies for dealing with household waste and they will need assistance (and funds) to implement a range of solutions. FWDs offer a rapid and cost-effective solution that could significantly affect the success rate of reaching these targets in London.

It is worth noting that while post collection separation of dry-recyclables is a cost effective means of working towards a *zero waste economy,* the yield of reusable or recyclable materials is seriously limited by contamination from wet, putrescible food waste. In contrast FWD remove food waste at source. Another argument in their favour is that users consistently express high satisfaction rates. They are not a solution for everybody: some households will tolerate food

[1] Evans, T D; Andersson, P; Wievegg, A; Carlsson, I (2010) **Surahammar – a case study of the impacts of installing food waste disposers in fifty percent of households.** Water Environment Journal. **241** 309-319

caddies, some with gardens adopt wormeries or compost heaps/bins but for many people the FWD is an ideal solution to reducing their household waste.

7. What do you think about a CO_2equivalent approach to managing waste? What are the pros and cons and considerations that must be taken into account with this approach?

We welcome an approach that includes calculations of the wider implications of collection regimes.

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives.

All processes must be simple and convenient. Composting is not an option for flat dwellers or those in terraced housing with no amenity space. Likewise recycling is difficult without storage space.

If the waste streams become mixed, or there is cross contamination, the cost of separation increases the carbon cost of processing and reduces their market value.

It is also essential that taxpayers believe that their money is being well spent. Waste collection is the one service that affects all Council tax payers and they are therefore particularly averse to the imposition of new conditions/costs. However, many residents are already committed to recycling and merely need not to be discouraged. The challenge is to persuade those residents that will not and to assist those that cannot to achieve participation in waste reduction and segregation.

16. Do you think London should be working towards a vision where it manages most of its waste within its boundaries?

While is is praiseworthy that London should reduce its impact on the rest of the country it seems unlikely that most waste will be managed within its boundaries. Indeed it could be argued that if sufficient energy is generated by London waste this could advantageously be used elsewhere. However it cannot be disputed that minimising the distances that waste is transported has to be a key priority.

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The housing density and large proportion of flatted properties; high volumes of traffic; high land prices; a shortage of available sites; ageing infrastructure; and wide variations in personal wealth are all factors that affect London's ability to contain its waste management.

We would suggest that managing London's waste within its boundaries is not a priamry objective.

In conclusion AMDEA would reiterate that householders need simple, convenient and affordable solutions to the challenge of dealing with domestic waste.

Encouraging people to reduce their waste is laudable and the present economic climate is likely to encourage many to assess their profligacy - offering simple solutions for dealing with unavoidable waste is the key to achieving the objectives in this strategy.

Yours faithfully



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By email (viewsonwaste@london.gov.uk) and post

10 January 2011

Re: Draft Waste Strategy Consultation

London First welcomes the opportunity to present its views on issues regarding waste, as part of the consultation on the Mayor's draft Municipal Waste Management Strategy and draft Business Waste Management Strategy.

London First is a business membership organisation with a mission to make London the best city in the world in which to do business. Our membership includes over 200 of the capital's leading employers across diverse business sectors. We work with the business community to identify issues, and develop solutions, to keep London a competitive and thriving business centre.

World class infrastructure is vital for London's and the UK's economy. The London First Infrastructure Commission, set up last year to understand in more detail the needs of London's business, published its final report *World class infrastructure for a world city* which you might have seen. The report makes 35 recommendations which will improve the way we plan, deliver and operate our transport, water, energy and waste infrastructure, for the economic good of London and the UK.

London First is a company limited by guarantee. Registered Office: 3 Whitcomb Street, London, WC2H 7HA. Registered in England: No. 2756521

I enclose a copy of the report (also available on our website – www.londonfirst.co.uk/infrastructure2), and append the relevant sections, but of particular pertinence to the Mayoral waste strategies, are the following recommendations:

- **The reluctance by local authorities to grant planning permission for waste facilities increases the costs of their development and undermines the Mayoral strategy of London becoming self-sufficient in waste disposal by 2031. Planning powers for waste in London therefore sit best at the Mayoral level and the referral threshold for planning applications for waste treatment facilities should be reviewed and reduced to support the development**
- **The Government must ensure that its reforms to national and local planning frameworks for infrastructure maintain timeliness and predictability for infrastructure providers as well as improving democratic accountability.**
- **The Mayor should play a greater strategic role in the planning and delivery of London's infrastructure:**
    - **first, as a pan-London client in regulators' periodic reviews. The Mayor, given his own regulatory functions of land planning and the role his other strategies play in London's economic development, should be a statutory consultee in the economic regulators' periodic reviews. Given the Mayor's electoral mandate, his views on the levels of provision that London needs should carry particular weight. The economic regulators should have a duty to comply with the Mayor's position, or, if deemed inappropriate, to explain why; and**
    - **second, there should be greater coordination between investment programmes in different sectors. The Mayor should make representations on London's overall needs to IUK as it updates its National Infrastructure Plan and IUK should, similarly, have a duty to comply or explain.**

Please do not hesitate to contact me if you would like to discuss any of this further.

Yours sincerely,

David Leam

David Leam
Executive Director, Policy

Excerpts from *World Class Infrastructure for a World Class City*

Waste

Each London borough collects domestic waste and is responsible for its disposal, either directly (12 from the 33) or, in the case of the other boroughs, through one of five regional consortia. The framework for disposal is driven by EU legislation and UK government policy. The historic reliance on landfill outside London is shifting as a result of increasing taxes on this method of disposal.

The London Plan establishes broad policy for the provision of waste facilities across the capital. The location of individual facilities is a matter for the boroughs in their local development frameworks. The Mayor has set out projected levels of municipal and commercial waste and the proportion of it to be managed in London by each borough. Based on this, and the most recent data from the Environment Agency, London is forecast to export 3.5 million tonnes of waste to other areas of England in 2011, falling to 2.6 million in 2016, 1.8 million in 2021, 0.9 million in 2026, with the aim of 'self-sufficiency' (no exports) by 2031.

Taken together, waste collection and disposal in England represent the third largest local government expenditure after education and social care. Costs excluding capital investment are forecast to increase from £3.4 billion in 2010-11 to £4.3 billion by 2014-15.25

There is currently substantial private sector and PPP investment in new waste disposal facilities within London, with further proposals in the pipeline. The transaction costs for large schemes can be high. For example, the energy from waste plant that Cory is developing in east London at Belvedere took nearly eight years to gain approval, with two public inquiries and two judicial reviews, and at a cost of millions of pounds to the company.

The Mayor's waste strategy supports small-scale waste disposal, in keeping with his strategy for decentralised energy (energy from waste being an important potential source). Such schemes can also face delay and high costs because of the reluctance of local authorities to give planning permission to new sites.

It is unclear from the evidence that we received whether planned capacity will be sufficient to meet London's forecast needs or there will be a shortfall. However, any shortfall will lead to London's waste authorities facing higher disposal charges and will thus serve to stimulate further entry. The planning system can be a significant barrier to the provision of such capacity. While the Mayor has the power to take over applications for waste facilities that are of potentially strategic importance - those that would treat over 20,000 tonnes of waste per annum and affect more than one borough - this would not necessarily cover the smaller scale waste from energy facilities that he wishes to encourage.

Recommendation: The reluctance by local authorities to grant planning permission for waste facilities increases the costs of their development and undermines the Mayoral strategy of London becoming self-sufficient in waste disposal by 2031. Planning powers for waste in London therefore sit best at the Mayoral level and the referral threshold for planning applications for waste treatment facilities should be reviewed and reduced to support the development.

Improving land use planning policy for infrastructure

Complaints about the UK's planning system, in particular the high transaction costs, have in recent years been voiced frequently by businesses and by a range of independent commentators. Planning consistently ranks as one of the main concerns of companies looking to invest in UK infrastructure. It has also been cited by the OECD as a drag on UK productivity.

Independent reviews of planning and transport by Kate Barker and Rod Eddington recommended reforms to the planning system for major infrastructure projects, which were taken up by the previous Government through the Planning Act 2008. The Act included: the creation of National Policy Statements (NPS), to set out national policy on a particular area of national infrastructure; a definition for Nationally Significant Infrastructure Projects (NSIP); and the introduction of the Infrastructure Planning Commission (IPC) to speed the process of reviewing NSIP.

The Government has set out its commitment to a planning system for major infrastructure which is "rapid, predictable and accountable". To this end it has made two major commitments. First, to abolish the IPC and return planning decisions regarding major infrastructure projects to Ministers in order to maintain democratic accountability. The IPC will be replaced by April 2012 with a Major Infrastructure Planning Unit which will form part of the existing Planning Inspectorate. Second, NPS will be subject to more detailed parliamentary scrutiny.

Not all infrastructure that is important to London is sufficient in scale to be captured by the NPS framework. The Government is planning a radical restructuring of local planning policy which may involve both a reduction in the right to appeal over local planning committee decisions and a rebalancing of the planning powers from the Mayor of London to the London boroughs. We are concerned that both of these moves could make it more difficult in practice to gain permission for facilities of London-wide importance likely to be unpopular with some local residents.

Recommendation: The Government must ensure that its reforms to national and local planning frameworks for infrastructure maintain timeliness and predictability for infrastructure providers as well as improving democratic accountability.

London-wide strategic planning

Re-establishing a London-wide tier of democratic government, through the GLA, led by the Mayor of London and scrutinised by the London Assembly, has led to a step-change in the quality and accountability of strategic planning for the capital since 2000.

The Mayor currently is involved in London's infrastructure delivery in four principal ways: the London Plan, the long term spatial development plan for London which sets strategic planning policy for the city; his transport strategy and control of the principal delivery agency, TfL; his other relevant statutory strategies where he possesses a mix of powers and resources, such as the economic development strategy (EDS); and through his powers of exhortation, lobbying providers and policy-makers.

A number of points were made to the Commission about lack of coordination between the Mayor's plans and those of the utilities; and between the separate utilities in London. We believe the Mayor's role in coordinating city-wide infrastructure provision should increase.

Recommendation: The Mayor should play a greater strategic role in the planning and delivery of London's infrastructure:

- **first, as a pan-London client in regulators' periodic reviews. The Mayor, given his own regulatory functions of land planning and the role his other strategies play in London's economic development, should be a statutory consultee in the economic regulators' periodic reviews. Given the Mayor's electoral mandate, his views on the levels of provision that London needs should carry particular weight. The economic regulators should have a duty to comply with the Mayor's position, or, if deemed inappropriate, to explain why; and**
- **second, there should be greater coordination between investment programmes in different sectors. The Mayor should make representations on London's overall needs to IUK as it updates its National Infrastructure Plan and IUK should, similarly, have a duty to comply or explain.**

The Mayor's draft Municipal Waste Management Strategy: London's Wasted Resources

1. Background

About London Sustainability Exchange (LSx)

London Sustainability Exchange is an independent charity that works to accelerate the transition to a sustainable London, by providing organisations and networks of individuals with the motivation, knowledge and connections they need to put sustainability into practice.

Our aim is to:

- Increase sustainability literacy in London
- Develop and influence policy and practice regarding London
- Learn from and broadcast good practice from everywhere

2. Introduction

Our response is primarily informed by a working "Executive" lunch entitled *Better by design - Enabling Londoners to boost recycling in the home through new technologies*[1]. Held in December 2010 in association with the Food Waste Disposer Group (FWD) and the Association of Manufacturers of Domestic Appliances (AMDEA) it set out to explore how new waste technologies for London's housing stock can help to tackle household waste, improve recycling rates and maximise the value of waste material.

Our response is also informed by LSx's direct experience delivering our **behaviour change programme** of work, including:

- the London Councils funded 'Energise London[2]' initiative
- the ERDF funded 'EcoVate[3]' project
- other projects tackling wider issues such as health and well-being, including Well London[4]

Involvement in these have given us insight into public attitudes and behaviours towards public services, a knowledge of the relative effectiveness of different elements of campaigns and projects, and, crucially, an understanding of how best to effect lasting change in behaviours.

3. Overview

Based on our recent work, our key recommendations can be summarised as follows:

- Information and publicity that raises awareness of the value of waste reduction should not be considered sufficient to catalyse change in behaviours of either producers or consumers. Individual campaigns, as well as the overarching strategy, must more accurately reflect the perceived benefits and costs related to waste reduction according to the target audience as opposed to policy makers.
- Increasingly technological solutions exist which greatly facilitate both the separation and collection of waste types for both householders and waste authorities as well as

[1] http://www.lsx.org.uk/news/events.aspx?id=3440
[2] http://www.lsx.org.uk/whatwedo/behaviourchange_page2575.aspx
[3] http://www.lsx.org.uk/whatwedo/ecovate_page3262.aspx
[4] http://www.lsx.org.uk/whatwedo/Well%20London_page3396.aspx

4. Recommendations

Policy 1:

Our key concern is the assumption within The Strategy, that being made aware of the value of reducing, re-using and recycling municipal waste, directly leads to a response and action. The policy states:

"Overall these proposals [1.1-1.4] will help reduce the amount of municipal waste generated by informing producers and consumers of the value of waste reduction, reuse and recycling" (pp76)

Evidence:

Key lessons from behavioural economics and social psychology [5] [6] indicate that there is a value-action gap and that it is a mistake to assume that people will act differently based simply on increased knowledge of the benefits of the outcomes. A successful campaign requires a combination of approaches to tap-into public values and to successfully bridge the value-action gap. *"Providing the practical information that Londoners need to recycle more"* (pp79) is not sufficient to drive change and there is crucial difference between *"promoting smarter, better informed purchasing and less packaging in products design"* (pp77) and actually catalysing a change by removing the barriers and actively incentivising a shift in behaviour.

Londoners need more than information and marketing. They need to have recycling programmes **designed around their needs**, habits and lifestyles and **in collaboration and consultation with them**, not just based on the needs of local authorities and contractors. While we appreciate that the subsequent policies address practical considerations that affect the interaction of householders with services, we think it is crucial that the true value and effect of marketing campaigns is understood and that they are not relied upon solely to create change

Recommendations:

- That actions and policies resulting from Policy One (informing producers and consumers of the value of reducing, reusing and recycling municipal waste) are fully integrated into the rest of the policies, delivered simultaneously with improved services and other recommendations resulting in the strategy.
- The Policy could be significantly strengthened by effective measurement of performance against behavioural goals, especially in areas such as high rise flats where recycling rates are low
- Promoting the reduce, reuse recycle message is accompanied by thorough participatory consultation with communities across London to create a service they can access.

Policy 4:

The Strategy states that to get from vision to policy that *"The mayor will work… to provide municipal waste recycling and composting collection services that are accessible and as consistent as possible across London, and provide an incentive for householders and businesses*

[5] A. Darnton, 2008. *Behaviour change knowledge review.* Defra and GSR 2008
[6] New Economics Foundation, 2005. Behavioural Economics: Seven principles for policy makers. NEF

to use these services." (pp. 113). LSx welcome the fact that many of these policies (4.2, 4.3, 4.4, 4.6, 4.7 and 4.9) improve or increase access to facilities, provide better incentives for accessing existing facilities and sharing knowledge amongst authorities so that this process is accelerated. This is a crucial enabling mechanism to accompany and support public engagement through campaigns.

We would recommend more emphasis on the role that use of new technologies can have in making recycling or composting *"a straightforward part of Londoners' lives"* (Vision, pp113). There are technologies that support both householders and communities to recycle and compost by **reducing the effort required by the individual**. The Mayor can directly support these by making it easier for developers to incorporate these technologies and highlighting the London-wide benefits and synergies with other London-wide strategies.

Evidence: Case Study – ENVAC's Wembley City project

Envac UK[7] was commissioned by Quintain Estates and Development to design and install the UK's first ever automated waste collection system. Waste and recyclables are collected through a network of underground pipes and are deposited, already sorted into dry recyclables, organic waste and non recyclables, at a single waste collection centre. The system can move waste underground up to 2km from its point of disposal, dramatically reducing vehicle movements and promoting a cleaner and safer environment in which to live and work. Residents separate their waste in specially designed bins installed in each home. Waste at the collection station is sucked through a cyclone, where it is separated from the transport air. The waste then falls down into a compressor where it is compressed, and fed into a sealed container. The transport air is released via a flue (after passing through dust and cleaning filters and silencers). When full, the container is taken away by waste removal trucks. Envac and Quintain worked with the London Borough of Brent to ensure that collected materials are compatible with Brent's waste management strategy, and that Brent's waste removal contractor, Veolia, would be able to service the collection centre.

- Recycling rates among residents in the first part of the development show that between 40 and 45 per cent of all waste is recycled – higher than Brent's 2006/07 rate (21 per cent) and exceeding Brent's current recycling targets
- The need for heavy waste transportation in the area has been reduced by around 90 per cent, due to the fact that waste collection activity is minimised. This Reduces $C0_2$ emissions Reduces the cost of waste removal Improves and enhances local environments

The London Borough of Brent now encourages housing developers who are looking to build housing in the borough to consider the option of including the ENVAC system on site.

Recommendations

- Government should place incentives for councils and companies in the private sector to implement and promote these types of technological improvements.
- There is a need to hold discussions early in the planning process and bear in mind duration of contracts, e.g. waste authorities are working to 25-year contracts.
- There is a need to make it easier for developers to incorporate new technologies in their developments. E.g. higher building codes may represent barriers to take-up.

[7] http://www.envacgroup.com/web/Start.aspx

Policy 5:

We acknowledge that improved infrastructure has a crucial role in improving the efficiency of dealing with waste and recycled materials and agree that the Mayor must play a pivotal role in developing the capitals waste infrastructure by working with and uniting the relevant authorities and partners across the capital. However at the moment we feel a major stakeholder not currently engaged in the waste process, or indicated in the Strategy, is the **water suppliers**.

Evidence: Case Study - Food Waste Disposers (FWDs)

FWD[8]s are devices that can be fitted under the kitchen sink. This technology quickly grinds food waste into small particles and then flushes them into the main wastewater system. It is not a new technology and is used by many people in the UK but take-up has not been systematic unlike in Sweden and the USA for example. FWDs:

- Provide a sustainable food waste solution for a variety of situations where people are unable or unwilling to participate in separate kerbside collection or home composting, including those living in flats and high-rise buildings as well as the elderly and infirm.
- Reduces traffic on the road network, particle emissions and the use of additional fossil fuels because output is transported and treated using existing (water sewerage) channels and infrastructure, unlike kerbside collection.
- Have a good carbon footprint requiring minimal energy and water use. The technology is fully compatible with current water infrastructure.

The waste water infrastructure in London could potentially transport a proportion of biological / organic waste without any additional load on it, reducing the need to develop new infrastructure so intensively (as indicated in 5.2, pp 133). It would also facilitate the composting rates in flats and high-rise blocks, another key target of The Strategy (4.4, pp113). Currently the water industry remains opposed to this technology, based on concerns over sewerage capacity and blockages[9] although the FWD group highlights research that refutes this[10]. It might be that a geographically specific approach needs to be taken.

Recommendation:

- That the Mayor and London's waste stakeholders develop better relationships with water suppliers, specifically to address the perceived costs of promoting technologies that use the sewers as a means of transport to process treatment centres.
- Subsequently an evidence based solution must be reached that takes a cost-benefit analysis approach to identifying how infrastructure and technology can best be developed to improve the waste infrastructure.
- Communicating benefits more widely - Evidence on environmental benefits and cost savings is strong and a greater push is needed to promote awareness of new technologies to more effectively 'sell' the benefits and cost savings to key decision makers.

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[8] http://www.food-waste-disposer.org.uk/
[9] http://www.water.org.uk/home/policy/positions/waste-macerators-position-paper
[10] http://www.food-waste-disposer.org.uk/the-science

Submission to the Mayor's Draft Municipal Waste Management Strategy for London

If London is to achieve a 20% reduction in waste produced by households by 2031 nappies must be part of the plan. Single-use nappies comprise not only a significant waste stream but also, like reusable shopping bags, play an emblematic role in influencing consumer behaviour. If the Mayor is truly looking to revolutionise cultural norms, washable nappies must be taken seriously.

Currently just 6.7% of London households produce about 170,000 tonnes of nappy waste every year (1) and (2). Is it right that Londoners spend £22 million (@£128 per tonne) each year on the disposal of single-use nappies when there is a zero waste alternative? It seems only fair and responsible that London spends at least a small percentage of this £22 million on giving parents information about the alternatives to the heavily marketed and easily available single-use nappy. Especially when those that do use washable nappies say real nappies save them money and they prefer them.

There are things some boroughs do already that encourage real nappy use. Fortnightly waste collections make it less easy to throw away disposable nappies and tend to lead to an increase in real nappy use. But in order to ensure their residents are informed about the benefits and availability of real nappies boroughs need to recognise that their residents do not always access ante and post-natal services within their borough but may access them in other parts of London and this is why a pan-London real nappy scheme is essential.

The Mayor's Municipal Waste Management Strategy needs to endorse real nappies and support Real Nappies for London's ambition to become a pan-London scheme

Many people ask why government of any kind should intervene in the nappy market. However the disposable nappy industry effectively gets subsidised to the tune of £22 million by Londoners as they bear the cost of the collection and disposal of single-use nappies. Not only this, the supermarkets use disposable nappies to compete for customers, forcing the price below the actual cost. People who shop at leading supermarket chains therefore subsidise the stocking and sale of this product. Both of these factors enable the disposable nappy industry to spend a huge amount on marketing and advertising including the sponsorship of the Bounty pack, which is given out by midwives to all new mothers. A leading disposable nappy company also sponsors the National Childbirth Trust (NCT), a charity of enormous influence on new parents.

Since July 2007 Real Nappies for London, in partnership with 14 local authorities and the North London Waste Authority, has been working with real nappy suppliers to increase awareness and use of washable nappies. We have also been offering a real nappy help line to residents applying for the Real Nappies for London voucher. We therefore have a strategic view of what works and what doesn't across London.

What we have found is that the most trusted source of information for the target group – expectant parents – is the midwife. We have to ensure that midwives across London are telling expectant parents about washable nappies at ante-natal classes. It is not possible for commercial enterprises to promote services/products at ante-natal classes but midwives can and do promote Real Nappies for London because it is an impartial source of information, supported by local authorities. It is also very efficient and possible for RNfL to be visible on all maternity units as there are only 36.

Another advantage of a pan-London scheme is that RNfL has feedback via its web site and communication with real nappy suppliers and users of where information is being received and leads to interest in real nappies. We can also see where web site hits to borough pages on the RNfL web site are below average and target those areas.

The mayor should support the growth of real nappy businesses

Once residents know that there is an alternative to disposables they need to find out where they can buy them. The disadvantage of the growth of nappy sellers on-line is that choosing real nappies can become overwhelming for first-time users. The RNfL web site (3) serves as a central source of impartial information and signposts people to where they can buy real nappies locally so they can see and touch them and get some advice as part of the buying experience.

This year RNfL is planning a high profile Real Nappy Week with its suppliers to bring real nappies to local high streets via 'pop–up' shops. The aim is to make real nappies seem as normal as disposables.

Another way to 'normalise' real nappies is for nurseries to use a nappy laundry service. This is working well in several nurseries in Islington and Hackney, both public and private. Local Authorities also need to be careful that contracts with waste collection companies do not disincentivise waste prevention. It should be more economical for a nursery to use a nappy laundry service but where disposal costs are not paid for directly the nursery does not recognise/receive the cost benefit.

London, like other densely populated metropolitan areas is an ideal place to establish a network of nappy laundry services. One of the barriers to real nappies is washing or at least the perception of it, especially for those living in small flats with no outside drying space. This is where nappy washing services have a role to play.

Long-term vision

It is crucial to understand that the disposable nappy industry is based on growth. When the birth rate is static the market is saturated. New single-use products are constantly developed to extend the time toddlers spend in nappies. This is not the kind of product that works with the Mayor's ambition for a zero waste London. What we have to acknowledge is that if nothing is done to challenge the disposable nappy industry, nappy waste is only going to grow and grow. The real nappy industry is not just important in reducing waste but actually preventing this waste stream continuing to grow.

If we can continue to increase the use of washable nappies in London, there is a real possibility that by 2031 cotton nappies will be used in maternity units – saving the NHS a lot of money on clinical waste costs. London could have local nappy laundries serving households, nurseries and maternity units based on canals, using grey water from canals and ozone to sterilise. Hydro electricity could power the driers. The nappies could be transported on bikes or small

electric vehicles and on barges. This is virtually a zero carbon option too. They could be using fair-trade organic cotton nappies. Each nappy would be used at least 100 times and at the end of its life recycled. Currently the market for this recycled cotton is £600 per tonne.

In order to get to this point we have to continue what the Women's Environmental Network (WEN) and pro-active London boroughs started in London over ten years ago, to continue to develop and support the real nappy market and ramp up the momentum. If the Mayor supports real nappy businesses London could become a world leader in this area.

(1) This estimate is based on 205,000 live births in London in 2009 x 874kg from birth to potty Source EA Report 2008
(2) 874 kg is weight given in EA update of 2008 and a correction to the 512 kg given in 2005 Nappy Life Cycle Analysis http://publications.environment-agency.gov.uk/pdf/SCHO0808BOIR-e-e.pdf
(3) www.realnappiesforlondon.org.uk

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BSDA's response to the Mayor's Draft Municipal Waste Management Strategy

The British Soft Drinks Association is the national trade association representing the interests of the UK's manufacturers, factors and franchisors of soft drinks, including fruit juices and bottled waters. Member companies make up over 90% of the industry, with annual retail sales in excess of £13 billion.

The Vision

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

BSDA believes that the Mayor's Vision for London is a positive step towards reducing the amount of municipal waste generated and to increase recycling and composting. We welcome the fact that the Strategy recognises the need to look at the waste management system as a whole, via a lifecycle approach. We also are encouraged by the fact that the Mayor acknowledges the importance of achieving significant CO_2eq savings through diverting waste from landfill.

Soft drinks companies take environmental protection very seriously and have already done a great deal to move up the waste hierarchy by reducing packaging through lightweighting; reusing secondary and tertiary packaging and making products more recyclable. The current LATS targets tend to encourage local authorities to collect heavier materials rather than the lighter, more valuable materials such as plastics and aluminium. These materials are more easily recycled and have greater carbon savings. This issue needs to be addressed.

Schemes such as 'Every Can Counts' focus on finding ways to collect cans from workplaces, leisure facilities and educational establishments and can help to increase recycling rates. It is important that schemes such as these are more prevalent and successful in order to improve the recycling rates.

Householders are confused by the inconsistent kerbside recycling collection systems, which can vary considerably between different local authorities. Having a more standardised approach would go some way to increasing recycling rates. Introducing a deposit system would have a negative impact on the household recycling system. Investments and efforts need to be concentrated on improving the systems that are already in place, rather than introducing new ones that may not be effective.

Education and improving public awareness of recycling is also very important. Changing the behaviour of the consumer is key to increasing recycling rates and preventing waste from entering the waste stream in the first place. It is also vital that individuals are made more aware that packaging is an important delivery system and a means of protecting a product. Without such packaging there would be far more product wastage. There needs to be a consistent message to consumers.

Infrastructure is currently not available to separate and deal with mixed plastics effectively. BSDA welcomes the Mayor's approach to investing in more recycling facilities. However, it is important that these facilities are made available before local authorities start to accept mixed plastics. Currently if bottles are collected with other plastics it is not economically viable to separate them out. This reduces the availability of rPET for use in manufacturing new bottles thereby increasing the demand for virgin PET.

The Objectives

The Mayor has identified the following objectives to help achieve his vision:

- **To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.**
- **To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.**
- **To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.**
- **To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.**

2. Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?

BSDA welcomes the majority of the Mayor's objectives to help achieve the vision. In particular, it is very important to change consumers' behaviour through education and through having the facilities available to encourage reuse and recycling.

Initiatives such as WRAP's *Love Food Hate Waste* and Keep Britain Tidy's *Love Where you Live* campaigns can help to increase consumer awareness and BSDA believes that the Mayor has a role to play in getting these messages across.

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

BSDA members are committed to reducing the waste they produce. One of BSDA's ambitions in our Sustainability Strategy is for members to send zero manufacturing waste to landfill by 2015 and to improve the sustainability of soft drinks packaging. Members have already done a great deal to lightweight their bottles, use rPET in their packaging and reduce the amount of waste produced.

Soft drinks companies are working with RECOUP to increase on-the-go recycling initiatives to ensure facilities are available for consumers to recycle materials purchased and used out of the home. This ensures that more materials are recycled rather than being disposed of in the residual waste stream.

It is important that waste is prevented from entering the waste stream in the first place. BSDA supports the Strategy's policy to set waste reduction targets. However, meeting and exceeding any reduction and reuse targets relies on increased participation from householders. This would be more easily achieved if a consistent waste and recycling collection system was offered across all London boroughs through collecting key materials such as a plastic bottles, paper/card, glass, aluminium and steel cans and food/organic waste. Collecting these materials would avoid confusion, reducing the amount of waste being thrown into the bin and would also improve the quality and quantity of the recyclate available to be reused.

Policy 3: Capture the economic benefits of municipal waste management

11. Any further comments on this policy?

BSDA again welcomes these proposals. Developing more dedicated plastics recycling facilities would ensure that plastics were sorted and reprocessed effectively. Encouraging the collection of materials such as lightweight, contaminated mixed plastics, which require considerable resources for cleaning, could hinder the aim to reduce greenhouse gas emissions unless the infrastructure exists to deal with the materials.

Currently if bottles are collected with other plastics it is not economically viable to separate them out. Therefore if all plastics were collected together, before the facilities existed to separate them, it would significantly reduce the availability of rPET for use in manufacturing new bottles and would result in an increased demand for virgin PET. If mixed plastics are to be collected for recycling, a great deal of investment would be required to ensure that facilities were available to sort these materials.

It is important to only collect plastic bottles until the infrastructure is in place to deal with the other materials.

Policy 4: Achieving high municipal waste recycling and composting rates

15. Any further comments on this policy?

We do not believe that schemes such as those proposed by the Campaign to Protect Rural England to introduce mandatory deposit systems in the UK will be effective. Particularly as this will only target a very small proportion of the overall litter problem. It is far more effective to concentrate on improving the current kerbside collection scheme and introduce more on the go recycling facilities to increase the recycling of products both in and out of the home.

The introduction of a mandatory deposit scheme would imply a considerable financial and regulatory burden for retailers. They would be required to manage the sorting, storage and collection of containers once they have been returned, which would pose a particular problem for smaller convenience stores. There are also health and safety implications arising.

CPRE's report (undertaken by Eunomia) estimates that the set-up costs would be £84 million and the running costs £700 million a year, and these may well turn out to be under-estimates. Research from Perchards stated that set up costs would be in the region of £450 million with annual costs of £1.4 billion being more likely.

In Germany, which according to Perchards is a better fit to the UK than the Nordic figures used in the CPRE report, the single use deposit scheme almost tripled the burden on the German economy and generated approximately a third of all recycling costs for only about 7.3% of the volume of post consumer waste.

In view of these enormous costs, we do not believe that mandatory deposit and returns are the most effective or cost effective way to collect waste packaging. Concentrating on improvements in kerbside collection and on the go recycling would produce much better results. A recent RECOUP report (*2010 UK Household Plastic Packaging Collection Survey*) stated that the proportion of plastic bottles collected in 2009 rose from 39% to 45%, with the overall volume collected increasing by 20% proving that the recycling rates are increasing.

The introduction of a mandatory deposit system would divert valuable material away from existing local authority collection schemes, potentially making kerbside collection less economic to operate and thus reducing, not increasing, the level of recycling. Kerbside collection schemes are simpler to operate, going with the grain of consumer behaviour rather than against it, which is why they are recognised to be more effective.

The soft drinks industry works actively with WRAP, RECOUP and local authorities to support the installation of bins and collection systems for on the go collection for recycling. This is a constructive way in which the industry can make improvements to the infrastructure for waste and recycling that the country needs.

Policy 5: Catalysing municipal waste infrastructure in London, particularly low-carbon technologies

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

The key barrier in delivering a waste sector in London capable of managing its own waste is the available infrastructure. Significant investment is needed in facilities to reprocess and dispose of waste.

As stated in BSDA's response to question 11, the lack of available of infrastructure to sort mixed plastics means that the majority of plastics are bulked together and exported to countries such as China. Soft drinks companies often have to buy rPET from overseas due to quality and supply issues with rPET in the UK.

Policy 6: Achieving a high level of street cleanliness

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

There needs to be an increased provision of facilities for the public to recycle materials whilst on the go. Soft drinks companies are working with RECOUP to increase on-the-go recycling initiatives to ensure facilities are available for consumers to recycle materials purchased and used out of the home. This ensures that more materials are recycled rather than being disposed of in the residual waste stream.

Sometimes the issue is not the availability of recycling bins, but how often they are emptied. Bins are not emptied frequently enough leaving consumers with no option other than to litter or put materials in to waste bins. This issue needs to be addressed.

Keep Britain Tidy's initiative *Love Where You Live* should help to raise awareness and encourage consumers to respect their surroundings more and to reduce litter in their environment. Encouraging businesses to work together to tackle this problem is a positive step and BSDA believes that involving large companies is important in helping to reduce the amount of litter on the streets.

About your organisation

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Organisation type: Trade Association

We employ 8 members of staff

Coca-Cola response to the London Mayor's Draft Municipal Waste Management Strategy consultation

January 2011

Background on Coca-Cola:

Coca-Cola in Great Britain is made up of two separate companies: Coca-Cola Great Britain (CCGB) and Coca-Cola Enterprises Ltd (CCE). We work closely together but play different roles. This is known collectively as the Coca-Cola System:
CCGB is responsible for marketing and developing new and existing brands.
CCE manufactures and distributes soft drinks for both The Coca-Cola Company and other brand owners.

The product range includes over 80 products, made up of sparkling soft drinks, still and sparkling fruit juice drinks, isotonic sports drinks, still and sparkling water and energy drinks.

- We have around 27% of the soft drinks category in the UK.
- In 2008 we sold around 4.4 billion packs in a variety of packaging formats – aluminium cans, glass and plastic bottles – and portion size – from 150ml cans through to 2 litre bottles.
- CCE is one of the largest users of packaging in Great Britain. We used a total of 205,365 tonnes of packaging in 2009.
- Our most successful brand, *Coca-Cola*, is also the biggest grocery brand in GB[1].
- Our high quality drinks are sold the length and breadth of GB in over 100,000 outlets.
- Throughout Great Britain we have a network of manufacturing sites, logistics operations and sales offices, employing about 4,600 highly skilled people to supply and service those customers.
- In **London** we have 2 manufacturing sites (at Edmonton and Sidcup), 2 head offices (at Uxbridge and Hammersmith) and a regional distribution depot and vending machine service centre at Enfield. In total we employ over 1,400 people in London.

Like any big business, the way we act affects the world in which we operate. We understand that it's our responsibility to make sure we do business in a way that is sustainable and makes a positive contribution to the environment and society.

As part of our Corporate Responsibility and Sustainability *2020 Commitment*, we have pledged to reduce the impact of our packaging; maximise our use of renewable, reusable and recyclable resources; and recover the equivalent of 100% of the packaging we place on the market.

[1] This is on annual sales figures for 2010, when Coca-Cola posted the largest branded sales of over £1bn in 2009. The figures were compiled for The Grocer magazine's Britain's 100 Biggest Brands annual survey. March 2010.

Waste reduction in our own operations:

- 100% of our waste at our Sidcup and Edmonton manufacturing sites gets recycled or recovered (nationally 99.6% of our waste at our sites gets recycled or recovered).
- Nationally, over the last four years we have achieved reductions in the amount of waste sent to landfill from our manufacturing sites from 313 tonnes in 2007 to less than 10 tonnes in 2010.
- All sites – including both our London manufacturing sites at Edmonton and Sidcup - have recycling improvement plans. This includes a range of initiatives to reduce waste, focusing on waste segregation systems: Employee communications including staff training, awareness campaigns, audits and bin labelling to minimise the risk of cross contamination of waste streams have also been developed.

Recycled-content in our product packaging:

- 60% recycled content in our aluminium cans.
- 44% recycled content in our glass bottles.
- We were one of the first companies to adopt the '*Recycle Now*' logo for our recyclable and widely collectable packaging. This was before other industry schemes that have, subsequently, been introduced.
- Working to achieve 25% recycled PET in our bottles by 2012

Waste reduction in our product packaging:

Committed to light weighting our packaging:

- We've supported the Courtauld Commitment by working with WRAP on industry-leading new lightweighting and packaging design, to help reduce the amount of packaging waste becoming household refuse. We have successfully light weighted our iconic Coke glass bottle, 500ml PET bottle and most recently our 330ml aluminium can. Our new can design will save 15,000 tonnes of aluminium across the EU each year (1,147 tonnes in GB), cutting carbon emissions by around 87,000 tonnes (6,730 tonnes in GB).

Helping consumers to recycle:

Recycle Zones:

- Recycle Zone is a 3-year on-the-go recycling scheme, in partnership with WRAP (the Waste and Resources Action Programme) and RECOUP.
- Recycle Zones is a consumer campaign designed to encourage and provide facilities for consumers to put their finished cans and plastic bottles in special recycling bins when out and about. They are placed in places such as shopping centres, theme parks, airports, railway stations and universities.
- It is a fully joined up waste recovery system in a closed-loop system.
- Across Great Britain we have, to date, placed over 100 Recycle Zones and collected and reprocessed over 235 tonnes of material for recycling.
- In London there are 7 Recycle Zones: At the London Eye, Sea Life Centre, University of Greenwich, The Mall shopping centre in Walthamstow, the Spitalfields Estate and Wembley Arena. They have collected 38 tonnes of material for recycling.
- In addition, Coca-Cola Great Britain has partnered with Westminster City Council to install 260 recycling units throughout the West End, as part of its commitment to help London stage a 'green' Olympics Games in 2012.

- To date more than four tonnes of recyclable material are collected every day, with a tonne collected daily on Oxford Street alone. This means that over the course of a year, the bins are expected to collect around 1,500 tonnes of recyclable material.
- There are currently three examples of 'high street' Recycle Zones – in Southampton city centre, Peterborough city centre and Westminster – as outlined above. A further city centre Recycle Zone will launch in Swansea in the next few months.

Support for Keep Britain Tidy campaign:

- We have been a member of the DEFRA ministerial-led steering group to help formulate what a 'Responsibility Deal' around litter reduction could look like.

Event recycling:

- Throughout Summer 2010 volunteers from Coca-Cola Enterprises attended music festivals (such as *V Festival*, *Creamfields, Isle of Wight Festival*) to collect cans, bottles and lids to help to keep the festivals free from landfill, and turn festival goers into active recyclers.
- Visitors to the festivals were able to see the recycling process in action as their bottles were crushed into bales, to be used as tables and chairs during the festival. They were then sent on for recycling once the festivals closed.
- The focus of the programme (which connected with nearly 500,000 members of the public) was to change recycling behaviours every day by demonstrating the valuable second life of recycled material.
- In total over 20 tonnes of recyclable material was collected throughout the summer.

Our London 2012 Olympic Games sustainability plans:

- The Coca-Cola Company is a Worldwide Partner of the London 2012 Olympic Games, as well as a Presenting Partner of the London 2012 Olympic Torch Relay, and a Partner of the London 2012 Paralympic Games.
- We have a history of using the Olympic Games to showcase new environmental initiatives and practices. At Vancouver 2010, we delivered a carbon-neutral, waste-neutral sponsorship plus a range of environmental initiatives including recyclable fixtures and signage and staff uniforms manufactured from recycled plastic bottles.
- We are determined to build on this record of achievement and will have a series of initiatives to announce in the months to come. In addition, we want to use the Olympic Games to inspire our consumers to live more sustainably, taking the small steps that could make a big difference to our planet.

RecycleBank:

- RecycleBank is a scheme which is designed to increase kerbside recycling rates by offering participating households rewards for their recycling efforts.
- We have been involved in the initial national trial in The Royal Borough of Windsor and Maidenhead, and in Halton, Merseyside, where residents participating in the programme could redeem their RecycleBank Points to select from a variety of everyday rewards – including money off vouchers for Coca-Cola brands.

We welcome the opportunity to respond to this consultation. This response is on behalf of both companies and represents our view across GB, including devolved administrations such as the London Mayor and London Assembly. We have answered those questions most appropriate to the 'Coca-Cola System'.

The Vision:

The Mayor's vision is that London will become a world leader in municipal waste management, utilising innovative techniques and technologies to minimise the climate change impact of municipal waste and to fully exploit its massive economic value. The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

1. What do you think are the key issues that need to be addressed in order to achieve this vision?

Overall, we welcome the Mayor's Vision for London. We are encouraged by his recognition of the need for a low carbon agenda. It recognises the need for business growth, while emphasising the need for a clear waste prevention programme. This will be underpinned by more and more business efficiencies and improvements in technology and ways of working, at source. In particular, we support the Mayor's calls for local authority recycling rates to be based on lightweighting, which recognises the overall carbon impact of products, rather than the current position which incentivises weight-based results.

The Mayor has acknowledged the need to tackle all parts of the 'System' - both upstream, with greater producer responsibility, designing out waste and reducing it as much as possible; and downstream, with greater investment and understanding for the need for an improved recycling reprocessing sector

However, there are some key issues he needs to address in order to achieve this Vision – as detailed below:

Need for improved household collection and recycling systems:

- From a Coca-Cola perspective improvement to the kerbside recovery and sorting system is the most important change required. We estimate that more than 70% of our packaging is disposed of at home. Yet despite high levels of recyclability of our product materials (95% are recyclable), consumers are confused by the inconsistent systems and standards of kerbside recycling collection, which vary between different local authorities. We believe that this contributes to relatively poor participation rates across London and nationwide.
- While we accept the principle of devolved political local authority responsibility for recovery, we believe that a stronger lead needs to be taken by the Mayor and by central Government. We believe that all local authorities should collect 5 key materials (glass, plastic bottles, metals, paper/card, food/organic). The Mayor should encourage these recyclables to be sorted at kerbside by collection staff into multiple streams.
- The (re)introduction of a deposit refund scheme is not the way forward and cuts across the existing household recycling system. Also, it would be costly, consumers habits have changed from the past and there is limited evidence that recycling rates would increase.

Need for behaviour change by producers:

- We are committed to ensuring that our product materials can be recycled (over 95% of our packaging is recyclable and can be put back into bottle-grade material) and we say so on the packaging, but there are a number of products that claim to be 'recyclable' when they are not, particularly in plastics, which often are low-grade.

- We would call for the Mayor to work with DEFRA on clearer guidance on how the word ‘recyclable’ can be used by producers.
- There is also a need for a wider communications change to how the word ‘recycling’ is used for household collections. Until there is a well-established and genuine closed-loop recycling system, we would argue that household recycling services should be called ‘collections’, rather than ‘recycling’.

Support for improvements to the reprocessing industry:

- We will support the plastic reprocessing industry through an investment and management programme.
- We welcome the Mayor’s commitment - through the London Waste and Recycling Board – to invest in the recycling infrastructure, but for this investment to be most efficiently used, we would urge the Mayor to be clear with local authorities that the amount of quality and quantity of household collections needs to improve in the Capital.

Lobby DEFRA to reform the Producer Responsibility system:

- The packaging Producer Responsibility system (Packaging Recycling Notes – PRNs and PERNs) has had significant success in increasing recycling rates in this country and we have been paying into it to help make these changes.
- However, the system now needs reform. We would encourage the Mayor to lobby DEFRA to engage producers in this review
- We are prepared to pay more – proportionally to our size - into the existing scheme to improve the recycling system. Yet, to make best use of these increased funds, reform of the current local authority household recycling system is needed.
- We would like to see the funding given over to the packaging export system to be used to support local authority recycling.

Recognition of the need for lowest carbon packaging:

- As outlined above we fully support the Mayor’s commitment to low carbon being the key objective of his strategy. We believe that high-levels of recycling is generally more material resource efficient.
- Technological advances in product development such as lightweighting need to be recognised more – the current LATS incentives system, for example, undermines this goal. It should instead incentivise low carbon waste management practices - for example recycling aluminium cans and glass.
- We need to celebrate the considerable efforts that have already gone into reducing waste: Our own logistics and stock-management efficiency operations, in coordination with customers, have driven down packaging wastage and is a model for how waste can be tackled through efficiency.

Joined up policy coordination between the Mayor and central Government:

- We would urge the Mayor to champion joined-up policy making across his administration and with it, better policy coordination with central Government. The issue of Waste covers a number of departments and we would ask how the Mayor sees London being plugged into a UK-wide strategy – and with it scalable change.

- The need for better policy coordination is necessary to ensure duplication or inefficiency isn’t created between competing bureaucracies.

Harnessing best practice experience:

- Coca-Cola has experience from other countries, particularly in the EU, that have enhanced recovery schemes. We would propose taking learnings from these kerbside collection systems to deliver consistent and cost-effective means of mechanisms to drive improvements in recycling rates.

The objectives:

The Mayor has identified the following objectives to help achieve his vision:

- *To provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.*
- *To minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.*
- *To unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of clean energy from waste.*
- *To manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.*

2. <u>Do you think that these are the correct objectives, is there anything additional that the Mayor should be focussing on?</u>

We have a genuine interest in making a positive difference to the waste and recycling system in this country. We welcome the Mayor's objectives to help achieve his vision – in particular the measuring of carbon of products and the wider point of the need for a low-carbon agenda. A more holistic way of looking at this issue should be for the waste agenda to be encompassed as part of a wider carbon reduction programme, of which low carbon should be the end goal to be achieved. This will ensure a wider environmental benefit that is measurable and has a clear central mission. It also recognises the need for business growth.

A low carbon model recognises the energy being used, in producing, distributing, retailing products, consumers transporting products to their home and then consuming them. Efficient, low carbon products, which reduce their carbon footprint in a holistic and joined up strategy is going to have a much greater and realistic chance of succeeding. In turn, this approach by London will positively contribute towards the UK's international climate change objectives.

We would urge the Mayor not to promote a self-sufficiency agenda, which constricts the possibility of a strategic waste management infrastructure through the imposition of geographical boundaries.

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment:

Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling:

3. What are your views on the Mayor's targets for reduction and reuse? Are they achievable, or stretching enough?

Coca-Cola is fully committed to designing out waste in our products. Not only have we successfully light weighted our iconic Coke glass bottle, 500ml PET bottle and most recently our 330ml aluminium can and improvements in glass and plastic bottle blowing technology has meant a more efficient and less carbon-intensive product. Both of our London manufacturing sites (at Edmonton and Sidcup) have a zero waste to landfill policy. 95% of our packaging is recyclable, meaning that we take our producer responsibility seriously of ensuring that we put packaging on the market that is recyclable. We are committed to designing out waste in our products. We are signatories to Phase I and Phase II of the Courtauld Commitment.

We are encouraged by the Mayor's approach to championing lightweighting and would urge him to reiterate this approach to ministers at DEFRA and DCLG. Currently there is no particular incentive further up the product chain for it to be collected and processed. There needs to be a clearer strategy with local authorities around its LATS targets. There is a built-in advantage for local authorities to collect heavier materials rather than providing an incentive for a waste stream based on their carbon benefit. This contradicts the Government's broader low carbon strategy and the need to encourage greater collection of other, often more lightweight materials, such as plastic and aluminium.

To help to support our moves towards consistently producing low carbon, lightweighted materials, we have called on DEFRA to encourage businesses to set up carbon analysis structures. We believe that will help drive better packaging, with a low carbon agenda as a goal.

We are a good case study of how this approach can work and make substantial differences to a business's carbon footprint:

> 'In 2008 we were the first soft-drinks company to calculate the carbon footprint of our products. This work was done in partnership with the Carbon Trust. When we calculated the carbon footprint of a product, we accounted for the emissions from every aspect of a product's lifecycle. This included emissions from growing the ingredients and making the packaging to the transport, sales and consumption of our drinks and final disposal of the empty container. For a standard 330ml can of Coke the carbon footprint is 170 grams of CO2. For a 330ml glass bottle of Coke the footprint is 360 grams. This shows how much difference a product's packaging material and weight can make to how much CO2 is emitted during its life. It also shows that the single most important thing a consumer can do to reduce the carbon footprint of our products is to recycle the bottle or can. For example, recycling an aluminium can reduces its carbon footprint by about 60%'.

We back, in principle, the Mayor's proposal of setting a waste reduction target, as it shows a commitment to long-term and measurable reductions in waste.

However, to some extent the percentage levels for reduction are irrelevant if all London boroughs do not offer consumers a chance to recycle at home 5 key materials of recyclable plastics, paper/card, cans, glass and food waste. If this is not available then consumers will continue to put these materials in the landfill bin. Equally, the unintended consequence of setting recycling-targets without systems changes around sorting could be that further contamination could result. Local authorities may push for waste reduction levels, but without properly sorting at the kerbside, the collected material is mixed together and ends up further down the process either being diverted back to landfill or sent to China for processing for low-grade recyclates.

We see the value in businesses and government working together to increase recycling levels and would encourage the Mayor to link in with central Government to see how a coordinated communications plan could work. There is a danger that different messaging going out from the Mayor's Office/the GLA and central Government could cut across each other and reduce its overall effectiveness in communicating to consumers.

Policy 2 - Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change:

7. What do you think about a CO2 equivalent approach to managing waste? What are the pros and cons, and considerations that must be taken into account with this approach?

As we've outlined above we are supportive of a low carbon waste agenda being part of a wider carbon reduction programme and see the carbon measurement of products as key to showing the overall, rather than perceived, impact.

The Mayor's proposals would need to keep to the waste hierarchy and we would question whether the Mayor's feels that this type of proposal could operate at a London-level – is a national level more appropriate and scalable? We would ask what products will and won't be included and how the policy will be deployed?

Policy 4 - Achieving high municipal waste recycling and composting rates:

12. What do you see as the key barriers in working to ensure recycling and composting is a straightforward part of Londoners' lives?

We would suggest that the situation needs a fully joined up Government approach – the Mayor and the GLA need to work with the London boroughs, central Government and businesses, such as ours, who produce packaging put on to the market in the form of consumer goods.

The full recycling system needs to be joined-up and holistic. Any proposals to motivate and encourage recycling levels need to be done with a low carbon footprint at the forefront. Some tactics which have the best of intentions to increase recycling levels, may result in the unintended consequences of a higher carbon footprint – the introduction of a deposits system is a good example of this.

We would encourage the Mayor to tap into the expertise that exists in leading businesses, such as ours.

We have best practice experience on environmental public policy, particularly in waste reduction and enhanced recycling recovery schemes, not only here in GB, but in other EU countries, that we would be prepared to share with the Mayor.

The issue of how to support London consumer recycling as a straightforward part of their lives, should be divided into 'household', 'business waste' and 'out of the home' recycling systems, as they have different challenges and opportunities:

Household recycling:

While we accept that household food and drink waste is now only a small part of the waste stream, Coca-Cola estimates that more than 70% of our packaging is disposed of at home. Yet despite high levels of recyclability (over 95% of our packaging is recyclable) we believe that the current fragmented collection and recycling system, which often differs from neighbouring borough to neighbouring borough is inefficient and confusing to consumers. This is acknowledged by the Mayor: "one of the key complaints Londoners regularly cite when asked about London's environment is the confusing nature of recycling services"[2].

To add to the complexity and confusion for consumers, the use of the words 'recyclable' and 'recycling' are being stretched to such an extent that consumers are now unsure on how the system actually works. There are a number of products on the market that claim to be 'recyclable' when they are not, particularly in plastics. Recycling these mixed plastics is expensive and the resulting output is only low-grade plastics, which are used for secondary uses rather than for their original purpose. Also, these mixed plastics contaminate the waste stream, adversely impacting recycling rates for those plastics which can be used for a closed-loop recycling system. We would call for clearer guidance on how the word 'recyclable' can be used on packaging.

There is also a need for a wider communications change to how the word 'recycling' is used for household collections. We would argue that kerbside recycling services should be called 'collections', rather than 'recycling'. The use of the word recycling leads consumers to believe that everything that is put in their recycling bins and bags is recycled, when it is not - contamination meaning it is often redirected to landfill.

We have experience of supporting recycling consumer campaigns – we helped establish and fund the Dutch "Plastic Heroes" campaign, which has had a very positive impact on recovery rates for Plastics in The Netherlands.

We believe that all local authorities should collect 5 key materials: Glass, plastic bottles, metals, paper/card, food/organic. We would urge the Mayor to encourage all London boroughs to follow this framework and ask central Government to implement this scheme nationwide.

The benefits of this proposal are:
1. These materials are potentially high value and through a genuine closed-loop recycling system can be recycled back into the packaging stream. Food waste can go to anaerobic digestion plants to create energy.

Other countries that have prioritised the consistent collection and reprocessing of high quality material have far more successful reprocessing streams.

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[2] The Mayor's Draft Municipal Waste Management Strategy consultation. Public consultation draft. October 2010. P36.

Plastic bottles, for example, have a high recognition factor for consumers – they would, to some extent, expect plastic bottles to be recycled. An example is Belgium where they have an excellent record in ensuring the collection of plastic bottles, which are then reprocessed to form material used for future bottles.

The Mayor should encourage local authorities to sort recyclables at the kerbside into multiple streams – this already happens in 12 London boroughs, as diverse as Hackney, Southwark, Kingston and Bromley[3].

It is important for separation to happen at the kerbside, as it helps to reduce contamination rates. It will ensure materials of sufficiently high quality are recycled – as prescribed in the revised EU Waste Framework Directive. This rationale is accepted by both WRAP and the Welsh Assembly Government.

We are concerned by reports of overall collection and sorted quality of current recovered plastics packaging material being reported as poor and deteriorating, plus cross-contamination of other waste recycling streams. There are increasing instances of delivered bales being rejected or rebaled with better quality material before being exported. If this situation were to continue we are concerned some processors will have a greater reliance on the export market to ensure target achievement.

Our experiences are that the quality and quantity is not coming through the system. A good example is rPET, which we currently do not purchase in GB due to the failings of the value chain in this country.

2. It establishes a basic, floor standard for local authorities, rather than prescribing exactly what they can collect over and above these materials, if they so wish. This would not stipulate how local authorities operate and we accept different areas need to tailor their collection systems according to existing partnerships with the waste management sector. However, we need to come together to drive increased standardisation and hence higher participation rates if we are going to establish a genuinely joined-up recycling regime in this country.

Directly incentivising consumers to recycle at home: We have been working with RecycleBank on rewarding consumers to recycle at home. We have been involved in the initial schemes operating in Windsor and Maidenhead and in Halton in Merseyside, and have since agreed to sponsor a multiple occupancy trial in Windsor and Maidenhead. A number of London boroughs have shown an interest in being involved and discussions with an Olympic borough have taken place, but to date RecycleBank have not yet engaged any one of them to commit to taking the scheme in their boroughs. We await news of their latest negotiations with interest.

'Business Waste':
Coca-Cola would welcome a voluntary code for commercial and industrial sources (pubs, clubs, restaurants etc) that encourages segregated collection of glass by colour (single biggest recyclable material they use) and maximises the opportunity for the material to have a closed loop secondary source.

[3] The Mayor's Draft Municipal Waste Management Strategy consultation. Public consultation draft. October 2010. P35.

'Out of the home':
1. 'On the Go' recycling: We will continue to support 'on the go' recycling options and have a credible record in helping to tackle this specific challenge. We support the *Recycle Zone* initiative, is a 3-year on-the-go recycling scheme, in partnership with WRAP (the Waste and Resources Action Programme) and RECOUP. In London we have 7 Recycle Zones in places such as the London Eye and Wembley Arena. They have collected over 38 tonnes of recyclate.

The partnership with Westminster Council has resulted in 260 recycling bins in operation, throughout the West End, collecting more than four tonnes of recyclable material every single day. The units were installed in March 2010 as part of its commitment to help London stage a 'green' Olympic Games in 2012 and leave a lasting environmental legacy for the city. The partnership was inspired by research conducted by Coca-Cola revealing that more than half of Londoners (56 per cent) want to recycle when away from their homes but 97 per cent think that is made more difficult by a lack of facilities.

2. Events recycling: In 2011 we will build on the success of our award winning "Event Recycling programme" by launching it at further major music and sporting events. Our focus will remain upon educating and influencing consumers to recycle every day and make good decisions at the point of packaging disposal.

3. Olympic legacy commitment: We believe the importance of the Games goes beyond our operations at the venues themselves and provides a unique opportunity to encourage lasting changes in behaviour. Reducing littering and promoting recycling are issues which are already high on our priorities in the UK so we intend to use our marketing expertise to promote recycling 'On the Go' both at Olympic venues and through the wider community.

We are also working closely with LOCOG on communicating the recycling message throughout the 2012 London Games. LOCOG has well-developed plans to ensure that a world-class recycling infrastructure is in place in all Olympic venues. We are working with them to understand how we can support this effort through our communications.

13. <u>What are your views on the recycling targets set by the Mayor - are they achievable or stretching enough?</u>

We support increased recycling rates, but these must be couched within the overall desire to reduce carbon emissions and quality recyclate is produced. Due to the way in which the current system seems to benefit material being collected by weight this works against a more holistic low carbon agenda, where lightweighting should be championed and actively promoted in policy formation. A genuine closed-loop recycling system also needs to be created, where quality is at the forefront of household recycling operations. Meeting increased recycling rates will not count for much if the same poor quality recyclate is being produced from household collections.

The current inconsistent and mixed collection system that operates by the London boroughs (and across the UK) works against the quality agenda.

The Mayor needs to tackle this with the measures we've outlined in answer to Question 12 to ensure that the recycling rates he wants to get London up to are achievable and make a worthwhile difference to recycled material outcomes.

There is also a key consideration around producer responsibility. If the Mayor wants to get to his proposed recycling targets he needs to lobby central Government around the producer responsibility scheme: Much has been achieved by shared producer responsibility at moderate cost. For 16 years we have paid into the scheme. We are in favour of reforms to the existing system rather than wholesale change. This is because, in principle, we are in favour of higher targets for materials recycling. We believe that higher targets pushes demand and additional funding through the market mechanism. This works best when there are longer-term deals. This creates certainty and supports investment and pricing through to local authorities. Therefore, we were disappointed by DEFRA's decision to freeze the UK Packaging Recycling Targets for 2011 and 2012. This has already resulted in prices dropping, meaning less producer responsibility funds coming through to help local authorities. Other EU countries see the benefit of progressive and stretching targets. Equally, we do not see this as an overly burdensome intervention on our business.

However, we have concerns with how the system works for specific materials – particularly plastic. Plastic is a multiplicity of mixed polymers of all shapes and sizes. It has no single use when mixed together in collection and need extensive sorting before those streams, which can be recycled, can be separated. The situation at the moment is that contamination levels are high due to the market of mixed plastics being collected together. We would encourage the Mayor to lobby DEFRA around both ensuring that producers put out onto the market materials that are genuinely recyclable and look at what reform of the producer responsibility scheme could look like and how that could benefit our reprocessing industries in GB.

14. <u>What specific role do you think the Mayor has to play in improving recycling across London?</u>

We believe that the Mayor has a strong role to play in improving recycling across London and using London as a best practice example of what could happen across the rest of the country.

The Mayor should set the recycling framework in which the London boroughs should operate. For example, influencing the boroughs to collect at least the 5 key materials we've outlined above, advocate the separate sorting of these materials at the kerbside by the local authority, with one overarching communications plan.

The Mayor should highlight and facilitate best practice, praising positive actions taken by producers in recycling and waste reduction.

Offering a strategic London-wide infrastructure plan is a crucial role for the Mayor. In particular, through the LWRB, he should be have a clear vision on what an improved reprocessing sector looks like, both inside and out of London, who are best placed technologically and cost-benefit, to get the best quality recyclate for London's recycling.

15. <u>Any further comments on this policy?</u>

<u>We do not believe that the (re)introduction of a consumer deposits refund scheme is the right way forward:</u>

We believe that it makes more sense to utilise the GB kerbside collection system than to build a separate infrastructure in stores/supermarkets or new collection points. Improving this system by designating that 5 key materials must be collected and recycled by local authorities will make a much greater impact.

The carbon footprint of consumers driving to stores with packs is significantly greater than improving the effectiveness of the current kerbside systems.

Evidence from other countries demonstrates a limited uplift in recycling rates resulting from a deposits scheme. For example, Germany has a deposit system for beverage packaging but has equivalent recovery rates to Belgium which has no deposit but an effective and standardised kerbside system.

Deposit systems cost significantly more than effective-at-home schemes to administer (due to the investment in standalone infrastructure). The Mayor accepts this argument, saying a deposits refund scheme would "require disproportionate investment in requisite infrastructure"[4], yet goes on to advocate a nation-wide scheme, which would ultimately cost the London consumer and London businesses.

The Campaign to Protect Rural England (CPRE)-commissioned report by Eunomia Research and Consulting in Summer 2010 claimed that a UK-wide Deposits Refund Scheme (DRS) would cost £84 Million to set up and around £700 Million per year to run. We believe this is optimistic. According to research from *Perchards* set up costs would be "around £450 Million and annual costs of some £1.4 Billion are more likely"[5]. This is a massive extra cost burden to put on the sector and does nothing to ensure competitiveness and a low cost-manufacturing base.

Also, the data collected by Eunomia was based on cost information from Nordic sources and from New Brunswick. It is questionable whether these are the most relevant sources. According to industry experts Perchards, the German experience would be a better fit to the UK model. The eight European countries supermarkets and manufacturers – including those countries quoted in the Eunonia research – operate both a DRS for non-refillable containers and refillable bottles. However, here in the UK supermarkets never stocked refillable bottles, and consumers generally lost the habit of returning their empty beverage containers to the corner-shop two generations ago.

We would urge the Mayor not to pursue a pro-deposits position and accept that the cost-benefit evidence does not show recycling levels would be significantly improved by the introduction of a deposits scheme. Instead, a more consistent household recycling collection system should be introduced.

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[4] The Mayor's Draft Municipal Waste Management Strategy consultation. Public consultation draft. October 2010. P122.

[5] Perchards are a consultancy specialising in monitoring and analysing policy on packaging and packaging waste, WEE and batteries. The quoted £ figures come from "Perchards challenges Eunomia's report on a UK deposit-refund scheme and suggests and alternative way forward" press release. 21 September 2010.
The Eunomia report hardly mentions Germany, whose costs are most relevant to the UK. In the Nordic countries, deposit-bearing non-refillables gradually replaced refillables over many years. Germany introduced deposits on non-refillables in 2003, and although its infrastructure was better suited to container returns than the UK's, the initial investment costs were €726 million. Translated into sterling and scaled down for our lower population, that would be equivalent to £450 million in the UK, more than five times Eunomia's estimate. Collecting through the German DRS costs nearly 5p per container. That's 2½ times the cost of collecting through the German kerbside collection system, which is itself much more expensive than the UK's. Collecting 28 billion containers in the UK at 5p each would cost £1.4 billion a year. This would be paid by consumers through higher prices and unclaimed deposits.

Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon technologies:

17. What do you think will be the key barriers in delivering a waste sector in London that is capable of managing the bulk of its municipal waste within its boundaries?

While levels of plastics recycling have increased significantly in a relatively short space of time (collection rate for PET for recycling rose from 39% to 45% last year, according to the Recoup 2010 Household Plastics Packaging Collection Survey) and investment in UK reprocessing capacity to convert recovered bottle plastic into clean recyclable material has occurred, it is still a relatively immature industry.

We purchase more rPET and recycled aluminium for cans than any other company in GB but we have to source it from abroad due to the current infrastructure problems outlined. Meeting the recycling targets which both Coca-Cola and the Mayor aspire to requires improvements and investment in the current infrastructure.

We also approve of the Mayor's desire – as outlined in the *Draft Business Waste Strategy for London* consultation - to use his "influence over London's planning regime to ensure that new waste treatment infrastructure is not delayed."[6] It is our understanding very few current UK Material Recycling Facilities (MRFs) have the ability to sort non-bottle plastics or handle bailed mixed plastics. Therefore any new sorting technology will require some time to come online - possibly three to four years - and would be subject to space availability in current sites and to find new sites. With these planning aspects in mind we would urge the Mayor to contribute to the debate around the Government's recently announced Localism Bill.

To help to improve the situation in this country and because we significantly value the ability to use GB-produced rPET we are prepared to support these improvements through an investment and management programme in the plastic reprocessing industry. The quality of material collected and then processed needs to improve. That is why we would urge the Mayor to establish a basic, floor standard for the types of materials collected at kerbside and then sorted. This will help to ensure UK manufacturing and processing sectors benefit from the plastics manufactured and used here, rather than being shipped abroad, quite often to China, for processing. To benefit from a Producer's Export Recycling Note (PERN) plastics are seen as one (unlike metals which are subdivided into steel and aluminium). We do not consider this to be fair to domestic reprocessors, because exported materials need much less work done to be awarded a PERN. According to recent research by WRAP[7], exports of recovered plastics increased from 548,000 tonnes in 2007 to 711,000 tonnes in 2009.

This is now a barrier to creating an effective and sustainable closed-loop system in this country. Exporters are able to place material on a boat to China, when the GB reprocessing industry could benefit if given the right amount of support. That is why we are calling for PERN funding to be used to support local authority kerbside recycling.

[6] The Mayor's Draft Business Waste Strategy for London consultation. Public consultation draft. October 2010. P75

[7] The Plastics Market Situation Report 2010, Realising the value of recovered plastics – an update. WRAP. August 2010.

Policy 6: Achieving a high level of street cleanliness:

19. **What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?**
20. **What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?**

We have a strong involvement in promoting high levels of street cleanliness in London (and across the country). We feel that there are three constructive ways to deal with litter:

1. Through the provision of out of home recycling facilities:

   Making it easy for consumers to recycle helps to cut down on litter. Our research found that more than half of Londoners (56 per cent) want to recycle when away from their homes but 97 per cent think that is made more difficult by a lack of facilities.

   To address this we have established 'Recycle Zones' – a consumer campaign designed to encourage and provide facilities for consumers to put their finished cans and plastic bottles in special recycling bins when out and about. 7 Recycle Zones exist in London (nationally we have over 100 Recycle Zones and collected and reprocessed over 235 tonnes of material for recycling) in high footfall areas such as at the London Eye, Sea Life Centre, University of Greenwich, The Mall shopping centre in Walthamstow, the Spitalfields Estate and Wembley Arena.

   The biggest Recycle Zone in London is in the West End, where we have 260 recycling bins in operation, collecting more than four tonnes of recyclable material every single day. We aim to collect around 1,500 tonnes in a year.

   At the Olympic Games we are committed to reducing littering through the promotion of recycling. We intend to use our marketing expertise to promote recycling 'On the Go' both at Olympic venues and through the wider community. We are also working closely with LOCOG on communicating the recycling message throughout the 2012 London Games. LOCOG has well-developed plans to ensure that a world-class recycling infrastructure is in place in all Olympic venues. We are working with them to understand how we can support this effort through our communications.

2. Incentivising consumers to recycle:

   A good example of this is the work we do at festivals and events - volunteers collect bottles and cans are crushed into bales, to be used as tables and chairs during the festival. At these events we have created a Coca-Cola 'swapshop' that exchanges used bottles for recycled PET merchandise, reminding festival-goers of the value of an empty bottle or can. In total over 20 tonnes of recyclable material was collected nationally, throughout the summer. In 2011 we will roll out this scheme to more events and festivals, continuing to educate consumers around the benefits of recycling.

Some organisations such as the CPRE have argued that a deposits scheme would incentivise consumers to recycle. The evidence does not bear this out - recycling rates do not significantly increase in those countries, such as Germany which has the scheme, versus those countries that don't, like Belgium. And it would make no difference to litter. Drinks containers make up less than 0.5 per cent of all litter.

3. Employee volunteering:

We have been a member of the DEFRA ministerial-led litter steering group to help formulate what a 'Responsibility Deal' around litter reduction could look like. This included employee volunteering. The employee volunteering scheme is going to be launched in March 2011 and will be open to all Coca-Cola Enterprises employees.

Support for Thames 21:
Our employees at our Hammersmith Office have supported Thames 21 for past 6 years. Last year we were involved in 4 events where colleagues volunteered for litter picks along the Thames riverbank. We also make a donation to Thames 21 each year as well. Next year we are looking at working with them on conservation projects as well.
In 2010, our Sidcup factory employees volunteered with Thames 21 to clean up the local River Cray.

Local litter pick action:
As part of their local 'Corporate Responsibility In Action' Week in October 2010, volunteers from our Sidcup factory, in conjunction with their local council – Bexley – took part in a litter pick of one the major roads that goes through Sidcup, the Edginton Way.

We welcome the opportunity to discuss all of these issues in more detail with the Mayor. We believe that these voluntary actions – emphasising recycling, incentivising consumers and employee engagement are good models to promote a litter-free environment. There is a strong 'Big Society' aspect, with Coca-Cola taking its producer responsibilities seriously and using the power of our marketing expertise to enthuse consumers and make it easier for them to do the 'right thing'.

About Your Organisation:

22. Name:

James Clark.

23. Organisation:

Coca-Cola Enterprises Ltd & Coca-Cola Great Britain.

24. Address:

Charter Place, Uxbridge, Middlesex, UB8 1EZ.

25. Type of organisation:

'Other' (producer, distributor and marketer of soft drinks)

26. Approximately how many people does your organisation employ?:

'251+'
(we employ 4,600 people nationally, of which 1,600 are in London)

Keep Britain Tidy response to '*The Mayor's Municipal Waste Management Strategy'*

Keep Britain Tidy is passionate about cleaner, greener places.

Our vision is for a cleaner, greener England respected and enjoyed by all.

We campaign AGAINST litter and neglect for better cared for and more attractive places.

We HELP by providing knowledge, advice and support.

We LEAD by inspiring policy and practical action.

19. What are the key considerations the Mayor should be making in promoting high levels of street cleanliness?

Keep Britain Tidy believes that the Mayor should act as a strategic conduit in order to bring together local authorities, land managers, civil society organisations and the private sector in a cross sector partnership. It is only through such an approach that the Mayor can co-ordinate local authorities, contractors, civil society organisations and networks to their maximum effect.

Keep Britain Tidy has a long history of joint work with the Mayor's office since its inception through, initially, Capital Standards and latterly through the Keep Britain Tidy London Network. We welcome the Mayor's proposal to develop a programme of work with Keep Britain Tidy and look forward to developing our relationship moving forward to help deliver the proposals contained within this consultation paper.

Keep Britain Tidy supports proposal 6.1 to work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping. We are supportive of the work of the London Borough of Lewisham through their Love Clean Streets online reporting system and its application outside of London in Leicester and Oldham amongst others. The use of such online systems supports the concept of a common standard for monitoring and managing local environmental quality. Furthermore, such technology will potentially increase engagement with harder to reach groups such as young people.

Keep Britain Tidy welcomes proposal 6.2 to work with local authorities to improve enforcement of environmental crimes, including litter and graffiti. This proposal builds on the good work already undertaken by the Keep Britain Tidy London Network Enforcement, Litter and Graffiti Working Groups in sharing good practice on a variety of issues including enforcement.

Whilst broadly supportive of the proposed minimum Service Level Agreement for enforcement by local authorities in London, we are concerned that such an approach runs the risk that such an agreement may only exist at the lowest common denominator. This is due to the different strategies used by local authorities to tackle littering. This is particular the case where a local authority may focus resources on education and awareness raising rather than enforcement. The recent significant reduction in the Revenue Support Grant for local authorities over the forthcoming Comprehensive Spending Review period also makes such an agreement challenging.

Keep Britain Tidy supports proposal 6.3 to encourage boroughs to recycle or compost their street cleaning waste where practicable. There are a number of local authorities undertaking such work both inside and out of London and Keep Britain Tidy would be happy to facilitate the sharing of such best practice through its London Network and national Keep Britain Tidy Network. Furthermore, we support proposal 6.4 to work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events. Once again the Keep Britain Tidy Network would be happy to facilitate the sharing of such best practice through both local authorities and contactors together.

Keep Britain Tidy welcomes any proposal to reduce the amount of litter such as that contained in proposal 6.6 regarding working with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London. However, it is worth noting that the 2009/10 Local Environmental Quality Survey of England (LEQSE) revealed a downward trend in the incidences of supermarket carrier bags to 4% of sites. While plain plastic carrier bags continue to be found on more sites (8% of sites). Therefore, we would recommend that the proposal is targeted at those sources from which unbranded plastic bags originate to ensure maximum impact.

Keep Britain Tidy welcomes proposal 6.10 to work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network and would recommend that this proposal includes a programme of engagement with those local authorities in which tube stations are located to ensure litter problems are also addressed at the entrances to tube stations where there is an increased likelihood of disposal of smoking related litter prior to entering the tube system. This could include the provision of bins and smoking bins but ongoing maintenance agreements and clear lines of responsibility between tube network maintenance contractors and local authorities is vital to ensure the long term success of such initiatives. Similarly relationships should be developed to consider the locating of bins adjacent bus stops to make it easy for the public to dispose of their litter.

20. What do you think is the Mayor's role in promoting a litter free environment? Are these the right actions for the Mayor to be taking, are there any others he should be considering?

The Mayor is a highly visible and influential figure in both London and across the UK, and Keep Britain Tidy actively encourages his continued support and encouragement for a renewed effort to reducing the amount of litter on London's streets. Given the Mayor's wide remit we would also urge such an influential figure to take a cross-cutting policy approach to tackling wider local environmental quality issues and to recognise the wider policy impacts of high quality places in terms of improved health, happiness and wellbeing in addition to its potential economic benefits.

Keep Britain Tidy supports proposals 6.7 (to work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting non-stick and degradable gum in London) and 6.8 to work with London boroughs, tobacco companies and tobacco retailers to develop a London wide smoking-related litter reduction programme. Furthermore, we would recommend that proposals 6.5 to 6.9 in this consultation paper should be closely aligned with the Love Where You Live message currently being developed by Keep Britain Tidy on behalf of Defra.

Love Where You Live is a Government supported cross sector litter related message which aims to substantially reduce the amount of litter in England by 2020. It has

evolved through 2010 through a Defra led, Keep Britain Tidy supported process. The Love Where You Live brand is under pinned by a set of six high-level principles which can be used by all sectors. These principles were developed through a multi sector Challenge process and subsequently successfully "road-tested" at the first England wide "National Litter Convention" in December 2010.

The six principles are:

- Encourage personal responsibility and positive action
- Take responsibility for keeping your own immediate area clean
- Work in partnership with neighbours to reduce litter
- Raise awareness and education about the prevention of littering
- Make it easy for people not to drop litter
- Become an active ambassador for clean place

Love Where You Live can be supported by any organisation and any individual. These can range from business, local authorities, land managers, civil society organisations and individuals.

Love Where You Live has been developed to enable public sector organisations to develop their own local versions of Love Where You Live. For example, the Love Where You Live message could easily be adapted by the addition of London into the message such as "*Love Where You Live London*" or "*Londoners – Love Where You Live*". The dovetailing of the Mayor's strategy for tackling litter and Love Where You Live could deliver efficiencies for the Mayor's office by reducing development costs by supporting a message already in development at the national level.

Keep Britain Tidy strongly supports proposal 6.5 to work with the London Organising Committee of the Olympic Games, the Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever, in advance of the Olympic and Paralympic Games. Keep Britain Tidy continue to supporters of the Changing Places legacy programme within LOCOG. Furthermore, since 2007 we have led the Capital Clean Up Campaign with the aim of improving levels of local environmental quality both before and after the Olympics. This campaign has grown year by year with over 200 events taking place in 2010. The campaign culminated in an awards ceremony for the most successful events at City Hall in June 2010 with Lizzie Noel (Mayoral Advisory on Social Action & Volunteering) presenting the awards. The day of activity proposed in the consultation will build on the work of Capital Clean Up but long term strategic support is required from the Mayor to build on the first three successful years of Capital Clean Up.

21. Any further comments on this policy?

To deliver high levels of street cleanliness it is essential that local authorities continue to monitor the impact of management activities post-National Indicator to ensure standards are maintained. This monitoring should include on the street surveys but also measures of public perception of local environmental quality issues across London. We would urge the Mayor to lead on a new localist monitoring framework which respects the notions of localism but also allows Londoners to be aware of street cleansing standards across London. This would follow on from the reports currently included in the Mayor's State of the Environment Report.

Education is a key part of any strategy to tackle local environmental quality problems and Keep Britain Tidy would recommend that this strategy makes reference to supporting programmes in schools. Keep Britain Tidy advocate that the Mayor supports the Eco-Schools programme which is an international award programme

that guides schools on their sustainable journey, providing a framework to help embed these principles into the heart of school life. Over 14,000 schools are registered as an Eco School which promotes pro- environmental behaviours to over five and half million pupils across England. Joining the Eco-Schools programme is free and it makes tackling sustainable issues manageable and easy for all schools, whether they are children's centres, nurseries, primary schools, secondary schools or schools with special status. Once registered, schools follow a simple seven-step process which helps them to address a variety of environmental themes, ranging from litter and waste to healthy living and biodiversity. Schools work towards gaining one of three awards – Bronze, Silver and the prestigious Green Flag award, which symbolises excellence in the field of environmental activity. Keep Britain Tidy believes that the Mayor's support for Eco Schools will support not only the waste strategy but a number of other Mayoral environment strategies.

For more details please contact:
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Consultation on the Mayor's draft Municipal Waste Management Strategy

Response from the Food and Drink Federation

This submission is made by the Food and Drink Federation, the trade association for food and drink manufacturing. Food and drink is the largest manufacturing sector in the UK (about 15% of total manufacturing output) turning over almost £73bn per annum; creating GVA of around £22bn; employing around 440, 000 people; and contributing around 2% of the UK's total GDP.

FDF encourages all local authorities to act in a more consistent way towards collection of household packaging waste and thereby removing one of the current obstacles to achieving higher recycling rates, maintaining the quality of recyclate and developing new end markets.

Policy area 4: Achieving high recycling and composing rates resulting in the greatest environmental and financial benefits

We call on the Mayor to encourage more convergence of recycling systems adopted by local authorities since the current divergence is only frustrating consumers. A more robust policy towards kerbside sort, whereby recyclables are sorted at kerbside by collection staff into multiple streams, in line with WRAP's own conclusions and the stance taken by the Welsh Assembly Government would be beneficial. This will be necessary in order to protect the quality of recyclate and in turn create sustainable value in the new end markets needed to absorb the greater quantities and types of materials that will be collected as a result of the higher targets. However, we encourage the recycling of certain materials only where there is a clear environmental and economic benefit in doing so and not for example lightweight, contaminated, mixed plastics.

Aside from collection higher recycling and composting rates will also mean more investment will be needed in the nation's sorting infrastructure. It also important that sorting facilities for packaging and other wastes, whether these be local authority or privately run, maximise the potential to take C&I as well as domestic waste according to an integrated approach.

The Mayor could help support consistent communication to improve public awareness that recycling has its own environmental impact, that recyclate needs to be kept as clean as possible and that packaging materials that are not currently worth recycling usually have environmental merits in other areas.

- **Proposal 4.9: The Mayor will ask government to consider implementing a national deposit system for cans and bottles.**

Whilst FDF strongly support moves to reduce litter and increase recycling rates we are not convinced that a deposit scheme on selected drinks containers is the best way of doing this. Keep Britain Tidy's litter survey in 2008 found that drinks containers make up only 0.4% of overall litter meaning that the costly approach proposed in this report - £700 million a year to run, on top of set up costs of up to £100 million - would be a very expensive way of tackling a

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very small proportion of UK litter, especially as 60% of used packaging is already being recycled via established recycling schemes.

There is also a serious risk that it might undermine existing efforts by local authorities to improve recycling through household collection schemes – where the revenue earned is an important part of keeping those costs down. Individual retailers would have no way of forecasting the volumes they would need to deal with, as people would be free to return containers anywhere. This could further complicate the logistics of collection and accounting. We think these issues need to be looked at very carefully, particularly in present economic circumstances, when many are looking to reduce rather than add to operating costs

Policy area 6: Achieving a high level of street cleanliness

- **Proposal 6.4: Work with a range of partners, including London boroughs and the private sector, to provide on-street recycling opportunities and to recycle waste from London's events.**

Our members have a good record in promoting high levels of street cleanliness. Coca-Cola has set up a number of 'Recycle Zones' which provide on-street recycling facilities. This scheme enables consumers to recycle finished drinks cans and plastic bottles while out and about and also helps cut down on litter. Currently there are 7 Recycling Zones in London located in some of the busiest areas.

- **Proposal 6.7: Work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting non-stick and degradable gum in London.**

FDF and its gum manufacturing members are actively involved in The Chewing Gum Action Group (CGAG), chaired by DEFRA, and have invested considerable funds in successful programmes to educate consumers and decrease chewing gum litter. CGAG is a cross-industry cross-governmental forum established to find an integrated solution to the issue of gum litter. Whilst CGAG members are keenly interested in non-stick and degradable gum development, our experience indicates that the long term solution to gum litter must be centred on behavioural change, through education (prevention rather than cure).

CGAG run annual chewing gum litter campaigns which involve supporting successful local authorities (LA's), who apply to be partners, and receive paid-for advertising towards their anti-chewing gum litter campaigns.

The awareness raising campaigns, include visuals, poster adverts as well as wider activities (campaign launch activities, additional materials and local business partnerships). Chewing gum litter is monitored in target areas within these Local Authorities throughout, and after the campaign. The 2010 campaign results show reductions in chewing gum litter of up to 84% in one LA and an overall reduction of 50% in chewing gum litter.

Additional support from the Government should be directed towards funding the provision of more enforcement officers to ensure the litter fines are properly highlighted and enforced. We believe that this will help support education messages that are already being communicated to consumers about good disposal of litter. Additional funding may also be considered to support the provision of additional bins in high footfall areas to enable consumers to dispose of their litter responsibly.

It is also worth noting that manufacturers promote responsible disposal of gum through on-pack messages, company websites and advertising which remind consumers how to dispose of the waste paper and chewed gum responsibly.

Furthermore, industry as a whole is committed to the systematic introduction of more environmentally friendly gum bases in its products that are safe and meet consumer quality, benefit and performance requirements. Manufacturers are researching the issue of a less adhesive and/or degradable gum and progress is being made.

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, employing around 440,000 people. The industry has an annual turnover of over £72.8bn accounting for 15% of the total manufacturing sector. Exports amount to almost £10bn of which 79% goes to EU members. The Industry buys two-thirds of all UK's agricultural produce.

The following Associations are members of the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
GPA	General Products Association
MSA	Margarine and Spreads Association
SB	Sugar Bureau
SMA	Salt Manufacturers' Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKHIA	UK Herbal Infusions Association
UKTC	UK Tea Council

Within FDF there are the following sectoral organisations:

BCCC	Biscuit, Cake, Chocolate and Confectionery Group
FF	Frozen Food Group
MG	Meat Group
ORG	Organic Food and Drink Manufacturers' Group
SG	Seafood Group
VEG	Vegetarian and Meat Free Industry Group
YOG	Yoghurt and Chilled Dessert Group

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The Queen's Walk
London
SE1 2AA

11 January 2011

Dear Sirs,

Thank you for giving us the opportunity to comment on the Mayor's draft business waste strategy. We broadly support the Mayor's four policies and the associated actions and we would like to draw your attention to an initiative which might contribute to achieving some of the Mayor's aims.

A central element of our activities is to help businesses to work together to reduce costs through shared services which contribute to creating a more sustainable environment.

One of our initiatives is our "Zero to Landfill" scheme which we believe could be a model for other districts to follow throughout London to manage waste more efficiently and in a more sustainable manner. It is a real example of localism in action.

The scheme recently won the Mayor's Best Value Award for London BIDs and we hope that the Mayor might consider it as part of any wider strategy for business waste management.

In recognition of government legislation and the need for efficiency and effective business practices, we created this major carbon cutting and cost cutting initiative - 'Zero to Landfill'.

Launched in April 2010, this leading scheme sees one joined-up service for all business waste needs and is a world-first for a commercial city district. Our service takes all waste streams to sustainable solutions and nothing to landfill. Paper, cardboard, plastic, and tin, make up around 90% of the waste from any typical office and to encourage stakeholder commitment this mixed recycling offer is free. Other services guarantee a minimum of 10% cost savings; general waste, glass, food waste, confidential waste, WEEE and hazardous waste.

Through economies of scale we have created a cost-efficient solution to urban waste. The service also makes a positive contribution to freight congestion and air pollution through joined up collections; our recycling service alone has removed 100 trucks from the district every week. We give businesses carbon-saving data back for reporting purposes and brand image. 'Zero to Landfill' is designed to help local businesses collectively reduce their carbon footprint by a minimum of 10% by 2015.

Below are some measurable outputs to date:

Recycling

- By March 2010 we had 210 businesses signed onto recycling, giving businesses an estimated financial saving of over £345,000 over the 18 months of the project
- 70 tonnes of material recycled each month
- 74% of businesses have rated the service as very good
- Daily collection with higher level of service than any other provider
- Decreased congestions and emissions – our electric collection vehicle has replaced 100 recycling provider trucks per week.

Zero to Landfill

- 90% of office waste collected free of charge
- All waste steams competitively priced – guaranteed minimum 10% cost savings
- Businesses provided with carbon saving data

We would be happy to discuss this initiative in more detail with you.

Yours sincerely

13 January 2011

Dear Sir,

The Mayor's Waste Strategy Consultation

The organisations is a global membership organisation that promotes and advances civil engineering around the world. It is a leading source of professional expertise in transport, water supply and treatment, flood management, waste and energy. It has over 83,000 members throughout the world, including over 60,000 in the UK.

The organisation's vision is to place civil engineers at the heart of society, delivering sustainable development through knowledge, skills and professional expertise.

The organisation supports and represents members residing and working across the region. Civil engineers are at the heart of London's infrastructure and through the organisation we speak with one voice giving you access to impartial advice and informed opinions.

We are pleased to enclose herewith our comments on the policies for the Municipal Waste Management Strategy. With regard to the Business Waste Strategy we are generally supportive of the Mayor's policies and will not comment further at this stage.

As a one of the leading professional bodies in London we would be pleased to be a part of any further consultations on theses strategies and their implementation.

Yours faithfully,

London's Wasted Resource: the Mayor's Draft Municipal Waste Management Strategy [download]

The Mayor has identified 6 policy areas that he will work in to deliver his vision for London's waste. Each of the policies is summarised below for your comment.

Policy / Proposal	Organisation's position
Policy 1: Inform producers and consumers of the value of reducing, reusing and recycling	
Proposal 1.1: Setting waste reduction and reuse targets	Although targets have a role it should be recognised that London sits within a bigger economy controlled by national legislation. The Mayor's proposal to work with government is supported. The organisation believes that resource management needs to cut across all government departments and regional bodies if we are to achieve integrated solutions.
Proposal 1.2 Supporting Londonwide communications campaigns and initiatives that promote municipal waste reduction, reuse and recycling	We fully agree that London wide communications are required. Not only should the communications campaigns recognise the ethnic diversity of London but they must also recognise the transient nature of a significant part of the population, who may originate from all across the UK as well as coming from abroad. This means that communications will need to constantly refreshed. Communication plans must also recognise the very high proportion of the London population that live in shared and leased accommodation who have little control of the management of the waste in their buildings. Perhaps there should be a specific campaign aimed at landlords and buildings management companies. Communication plans should also make residents aware of the need for infrastructure to manage and process the waste they produce. Most importantly it is essential that communications relate to projects on the ground; consumers will rapidly disengage from the process if the infrastructure (bins, boxes, recycling points etc) are not in place when they are being asked to do something.
Proposal 1.3: Reducing the amount of municipal waste entering the waste stream	Although the Mayor's proposals to encourage the use of the Green Procurement code and to work with small businesses is supported it is difficult to envisage how they will make a significant contribution to reducing municipal waste as the majority of the components of the waste stream will have originated fro outside London.
Proposal 1.4 Tackling the barriers to providing effective reuse services	The Mayor's proposals are supported.
Policy 2 – Setting a CO2eq standard for municipal waste management activities to reduce their impact on climate change	
Proposal 2.1: The Mayor will work with waste authorities to apply the Mayor's waste hierarchy in delivering their municipal waste management	The use of CO2eq as metric for waste management services is supported, however the exact details of how the system is to be used needs careful

functions in a way that achieves the greatest possible CO2eq savings.	consideration. It should also be appreciated that a significant part of London's municipal waste infrastructure is already built or in procurement
Proposal 2.2: Using Defra's Waste and Resources Assessment Tool for the Environment (WRATE), the Mayor will set a lifecycle CO2eq EPS for the management of London's municipal waste. The EPS will be set to achieve the greatest climate change mitigation benefits from London's municipal waste at least cost.	We fully support the need to manage the CO_2 impacts of waste services, and are not opposed to a gradual shift from weight-based targets to carbon-based targets as the next round of European Directive targets are set. In the meantime, we support a requirement on waste authorities to formally assess their services using WRATE and to be accountable for their performance in this regard.
Proposal 2.3: In addition to setting the EPS, the Mayor will set a minimum CO2eq performance for energy generation from London's residual municipal waste. The minimum CO2eq performance will ensure energy generated from this waste will be no more polluting than the new base load energy generation it replaces.	We do not believe that that waste authorities should be directed to implement services and technologies by reference to the most modern gas power station in order to achieve the best practicable environmental option. This is an inappropriate benchmark for waste facilities and services that can only lead to high cost and potential risk with new and unproven technologies. Whilst comparison with gas fired energy generation may be considered appropriate for environmental purposes, a mixed energy economy is preferable to mitigate the risks associated with volatile gas supplies. The environmental 'cost' may be considered an appropriate price to pay for certainty of generation.
Proposal 2.4: The Mayor will work with the Environment Agency and WRAP to develop a web-based 'ready reckoner' tool that waste authorities can use to determine the CO2eq performance of their municipal waste management activities easily, and compare them against the EPS and minimum CO2eq performance for energy generation.	The ready reckoner tool is likely to be of very limited value in the detailed design of new waste infrastructure
Proposal 2.5: The Mayor will work with the Environment Agency and waste authorities to ensure that achieving the EPS and minimum energy generation CO2eq performance will not have any significant adverse impacts on other environmental considerations, including air quality and biodiversity.	Supported
Proposal 2.6: The Mayor will encourage waste authorities to join TfL's Freight Operator Recognition Scheme (FORS) to help make the transport of waste safer, greener and more efficient.	Supported
Policy 3: Capture the economic benefits of municipal waste management	
Proposal 3.1 The Mayor, through the London Waste and Recycling Board, will identify and implement efficiencies in municipal waste management in London. This will include, but not be limited to, working with London Councils and waste authorities to explore the opportunities to establish joint waste authority procurement contracts that would bring about economies of scale.	Inter authority working should be supported. Given the limited availability of land in London the need to build waste management/resource recovery facilities within prescribed political boundaries makes no sense.
Proposal 3.2 Establish a framework of waste collection contracts from which waste collection authorities can draw down services.	In our view this is not a good proposal. Although in theory frameworks should reduce procurement costs in fact they do not, as with time they have to be constantly be revisited. Frameworks also limit innovation which all authorities need to look out for to meet the changes that the changing waste and resource landscape require.
Proposal 3.3 The Mayor, through the board, will work with London Councils and Capital Ambition to develop model municipal waste contracts for waste authorities to use.	There are model contracts already in existence and again boroughs should have the opportunity to innovate to suit local needs.

Proposal 3.4 The Mayor will, through the London Waste and Recycling Board, seek to provide investment to help waste authorities and the private sector establish waste management facilities that achieve the greatest reductions in greenhouse gas emissions including facilities for reuse, upcycling and closed loop recycling.	This proposal is fully supported as investment in some early stage technologies is difficult to obtain without some support for bodies like LWaRB
Proposal 3.4 The Mayor will, through the London Waste and Recycling Board, help waste authorities that are interested in building and operating their own waste facilities to develop those facilities, particularly where they are able to work in partnership with other waste authorities.	This proposal is supported
Policy 4 – Achieving high municipal waste recycling and composting rates	
Proposal 4.1: The Mayor will set recycling and composting (including anaerobic digestion) targets for London's municipal waste of 45 per cent by 2015, 50 per cent by 2020 and 60 per cent by 2031	The organisation would like the Mayor to consider CO2eg targets to be used rather than tonnage targets to ensure that materials with the highest carbon benefits when reused or recycled (eg aluminium, textiles) rather than the heaviest. However the measurement systems and evidence base needs to be established before realistic targets are set. There is no value in setting local CO2 targets when the rest of the UK and Europe are still focused on weight based targets.
Proposal 4.2: The Mayor, through the London Waste and Recycling Board's best-practice coordinator service, will work with waste authorities to develop cost-effective and easily accessible recycling and composting services to all London households and small businesses. The aim is to showcase good practice and identify opportunities to deliver high quality, consistent and cost-effective collection services achieving high rates of recycling and composting.	Supported
Proposal 4.3: The Mayor will work with boroughs and the London Waste and Recycling Board to help boroughs provide recycling and composting collection services for small businesses, comparable with those services provided for households.	Supported
Proposal 4.4 The Mayor, through the London Waste and Recycling Board, has allocated £5 million to fund infrastructure measures to increase recycling or composting rates from flats, particularly those offering social housing.	Supported
Proposal 4.5: The Mayor will work with waste authorities to increase recycling and composting at local Reuse and Recycling Centres (RRCs).	Supported but given the limited number of RRCs and the low car ownership in London consideration should be given to extending the number of accessible local recycling points across the metropolis.
Proposal 4.6: The Mayor will work with waste authorities to provide incentives for Londoners to recycle and compost.	There are good examples of incentives in practice eg Windsor & Maidenhead, and proven examples should be adopted rather than creating new, untried schemes. The Mayor should seek incentives higher up the waste hierarchy, aimed at minimising waste production through good design and rewarding re-use.
Proposal 4.7: The Mayor will work with waste authorities, TfL and the private sector to provide "on-the-go" recycling bins across London.	Supported. London has a significant transient population not only workers from outside London but also tourists, both domestic and international.
Proposal 4.8: The Mayor, through the London Waste and Recycling Board's best practice coordinator service, will fund Capital Waste Facts, which collates municipal waste collection services and information across all London boroughs.	Supported

Proposal 4.9: The Mayor will ask government to consider implementing a national deposit system for cans and bottles.	Supported
Policy 5 - Catalysing municipal waste infrastructure in London, particularly low-carbon	
Proposal 5.1: The Mayor, though the London Waste and Recycling Board, will secure investment for waste infrastructure in London	This investment is very important particular for local, innovative schemes.
Proposal 5.2: The Mayor, through the London Waste and Recycling Board, will catalyse waste infrastructure in London, particularly those using low-carbon technologies.	Supported
Proposal 5.3: The Mayor will work with waste authorities to manage as much of London's municipal waste as possible within London to achieve regional self-sufficiency targets as set out in the London Plan.	Supported
Proposal 5. 4: The Mayor, through TfL, will encourage the movement of waste via sustainable modes of transport.	Supported. The organisation have worked with various groups to look at intermodal transport opportunities for the movement of wastes particularly in London. For this proposal to be effective it needs to be integrated with other planning strategies e.g. the protection of wharfage.
Policy 6: Achieving a high level of street cleanliness	
Proposal 6.1: The Mayor will work with London Councils and the London boroughs to develop a mobile and online reporting and recording system for litter and fly-tipping.	Supported. Fly tipping is a concern to the organisation, particularly construction waste, and concerted efforts to eliminate problem by closer co-operation of all agencies are vital
Proposal 6.2: The Mayor will work with local authorities to improve enforcement of environmental crimes, including litter and graffiti.	The organisation have no particular comment on this and the remaining policies on street cleanliness
Proposal 6.3: The Mayor will encourage boroughs to recycle or compost their street cleaning waste where practicable.	
Proposal 6.4: The Mayor will work with a range of partners, including London boroughs and the private sector, to provide on-the-go recycling opportunities and to recycle waste from London's events.	
Proposal 6.5: The Mayor will work with the London Organising Committee of the Olympic Games, Capital Clean-Up campaign, Thames 21 and other voluntary organisations to undertake the biggest clean up ever.	
Proposal 6.6: The Mayor will work with London Councils and the London boroughs to develop a road map towards a plastic-bag-free London.	
Proposal 6.7: The Mayor will work with gum manufacturers and London boroughs to reduce the blight of chewing gum on London's streets by piloting degradable gum in London.	
Proposal 6.8: The Mayor will work with the London boroughs, tobacco companies and tobacco retailers to develop a Londonwide smoking-related litter reduction programme.	
Proposal 6.9: The Mayor will apply to the Chewing Gum Action Group for funding for a behaviour change programme on chewing gum litter for London in the years leading up to 2012.	
Proposal 6.10: The Mayor will work with Transport for London and London Underground to empower Londoners and visitors to be more responsible with their rubbish while on London's transport network.	

Additional Response

The organisation would wish to see the Mayor incorporate in his policies the concept of the need to incorporate provision for waste and resource management in all developments, not only in the planning stages but also within the buildings regulations. Provision must be made for householders to be able to separate and store their waste; collection vehicles to reach premises; space provided for recycling points; provision made for re-use and recycling centres as well as local compost and treatment facilities. We would recommend the ICE's "*Code of Practice - Planning for resource sustainable communities: waste management and infrastructure"* is adopted.