

**THE
MANAGEMENT STRATEGY**

CONSULTATION REPORT

AUGUST 2011

Table of contents

1.	Introduction and background	3
	1.2 Consultation Requirements	
2.	Consultation process	4
	2.1 Consultation with the London Assembly and functional bodies	
	2.2 Consultation with the public	
	2.3 Consultation with stakeholders	
	2.4 Integrated Impact Assessment	
3.	Findings from public consultation	6
4.	Findings from stakeholder consultation	15
5.	Incorporating municipal waste management strategy	17
6.	Appendix 1: Strategy public survey	18
7.	Appendix 2: Stakeholder consultation responses	20

1. Introduction and background

This report summarises the main themes and issues raised by the public and stakeholders in

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 Municipal Waste Management Strategy was published in September 2003.

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.

revised

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

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

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.

–

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 Strategy² 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
under the 1999 European Landfill Directive.

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 Mayor must have regard to, among other things, the National Waste Strategy which sets out 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 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 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 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 of municipal waste from landfill

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 CO₂ 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

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.

March 2011 that contained thirteen principal recommendations. The Mayor published his th 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 contacts⁵ and advertised on a number of Borough web pages.

responses. 50 stakeholder responses were also received. The survey pages can be found at Appendix 1.

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 pop 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

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?’

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 respondents, however, who contended 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.

Th

-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

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

- 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?’

be delivered fast enough. Comparisons were made with other countries, with the feeling
llenging for the dirty man

The provision of educational information as to how to reduce personal waste was cited as
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 distinguish 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.
- 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

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 respondents 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 convey their unwanted goods to reuse collection sites.

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

In general, respondents 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, 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 respondents 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

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 –
- Deposit schemes;
- Waste targets and associated penalties for businesses;
- Incentives for refills that save waste – for example, 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?’

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 respondents 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
- 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 – recycled together then there should be legislation making all plastics compatible for recycling together.
-

Information

Responses still show some level of confusion about what waste

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

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-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 ng 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
- 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.

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 e 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.

Respondents were generally quite positive about 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 should 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
- 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.

for the
unrecyclable).

4 Findings from the stakeholder consultation

waste reduction and 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:

- targets given its diverse and transient population, high proportion of high density housing, and proportionally less garden waste than other UK regions.
- a g , 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
- c 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 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 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

The GLA confirmed at this workshop, however, that the minimum CO₂ 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 , makes an important contribution to achieving s CO₂ 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

SECTION 5: SUMMARY OF INCORPORATING 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	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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: <ol style="list-style-type: none"> 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Proposal to work with LEDNET borough group work on street cleansing • LEQ programme links with DEFRA Chewing Gum Group