

London Assembly Environment Committee's response to the Public Consultation Draft of the Municipal Waste Management Strategy

1 Background

1.1 This report constitutes the reply of the London Assembly Environment Committee to the Public Consultation Draft of the Mayor of London's Municipal Waste Management Strategy.

1.2 The timetable for the Municipal Waste Management Strategy is:

- July 2001: Assembly and Functional Bodies Draft of the Strategy published
- November 2001: Assembly's response submitted to the Mayor
- September 2002: Public Consultation Draft of the Strategy published
- December 2002: Responses to the Public Consultation Draft submitted to the Mayor
- First half of 2003¹: Strategy published in agreed form.

1.3 The Public Consultation Draft of the Mayor's Municipal Waste Management Strategy (the Strategy) has taken action, at least in part, on all 20 of the recommendations made², by the Assembly in its November 2001 response to the Assembly and Functional Bodies Draft of the Strategy. Annex A, completed by the GLA Policy and Partnerships Directorate, provides details of the actions taken by the Mayor.

1.4 We note that for three of the Committee's recommendations, further work remains to be done:

- On Recommendation 7 – “the Mayor should issue his best practice review of recycling, composting and promotion to waste authorities by April 2002” – the Mayor has been unable to do this and has cited staff shortages as the reason. Nevertheless this should be treated as a priority. We therefore ask that this happens by March 2003, a year later than the date given in our initial recommendation and in time to inform the 2003/04 allocations from the £21m London Recycling Fund. The guidance should be extended to include waste minimisation (covered in section 2 of this response) and make use of existing material from London local authorities, international sources (e.g. the Zero Waste experience in New Zealand and the USA) and other bodies such as the National Resource and Waste Forum

¹ The Draft Core GLA Business Plan gives 30 May 2003 as the target date

² The actions are listed in the paper forming agenda item 7.2 for the London Assembly Environment Committee meeting 15 October 2002 – available on the web via: www.london.gov.uk/approot/assembly/envmtgs/2002/envoct15/envoct15agenda.jsp

- On Recommendations 8 – “the Mayor should publish a full timetable for his recycling-led Strategy, with quantifiable targets for each of the implementation programme...” – and 9 – “the Mayor should include more detail in the Strategy on implementation costs, clearly identifying key dates in the process and the costs attached to specific elements of implementation” – the Committee’s views are given in Section 4 of this response.
- 1.5 This paper offers further comments, and where appropriate, recommendations on the key issues which, in the view of the London Assembly Environment Committee, remain critical to the achievement of the objectives of the Strategy.
- 1.6 The three sections of this response correspond to the issues identified by the Committee in the course of its work on the Strategy. The first two deal with the waste minimisation and recycling led approach favoured by the Strategy and the third focuses on the delivery mechanisms for the Strategy:
- Waste minimisation
 - Kerbside recycling
 - Implementation.

Recommendation 1

The Mayor should honour his commitment to issuing a best practice review of waste minimisation, recycling, composting and promotion to waste authorities and do this by March 2003 so that it can inform the 2003/04 allocations from the £21m London Recycling Fund.

2 Waste minimisation

2.1 This section considers:

- The Mayor's proposals on waste minimisation contained in the Strategy
- The Committee's waste minimisation seminar.

The Mayor's proposals

2.2 The Strategy acknowledges the vital role waste minimisation has to play in London's municipal waste management: "there has been an implicit assumption that, amongst other factors, as society in general becomes more affluent the amount of waste will rise. A sustainable strategy for waste therefore needs to tackle this growth and uncouple waste production from increasing affluence"³.

2.3 The Strategy goes on to point out⁴ that recycling alone cannot solve the problem of waste growth. Waste minimisation is therefore vital to reducing the amount of waste going to landfill or being incinerated.

2.4 Indeed, with increasingly restrictive limits, both physical and regulatory, on landfilling waste, stabilising waste production is as important as recycling in maintaining the widest range of options for managing London's waste. As the Mayor's companion paper to the Strategy, *Rethinking Rubbish in London*, puts it, "with effective waste minimisation measures in place, there would be no need to introduce additional mass burn incineration capacity before 2013, even if London does no better than achieve waste Strategy 2000 targets"⁵.

2.5 The Strategy indicates that, allowing eight years for contract development, planning and construction, the potential need for additional mass burn incineration would not need to be considered "until at least 2005"⁶. Given that 2005 is less than 110 weeks away, there is some urgency to demonstrate the potential contribution of waste minimisation measures in stabilising levels of municipal waste. This is necessary to ensure that a minimisation and recycling led strategy can be sustained.

2.6 The Strategy also acknowledges that "there are some practical examples of waste minimisation schemes being undertaken already and waste authorities need to learn from these"⁷. Policy 11⁸ commits the Mayor to minimising the production of waste thereby reducing the amount of waste produced and reversing the growth in waste.

³ Paragraph 4C.4 on page 129 of the Strategy

⁴ Paragraph 4C.12 on page 131 of the Strategy

⁵ Page 21 of the Mayor's *Rethinking Rubbish in London*

⁶ Paragraph 4B. 11 on pages 127 and 128 of the Strategy

⁷ Paragraph 4C.7 on page 130 of the Strategy

⁸ Page 137 of the Strategy

- 2.7 Accordingly the Mayor proposes to lead a Waste Minimisation Programme for London⁹ to include:
- Conducting research into waste growth and methods of measuring waste minimisation
 - Lobbying designers, manufacturers, retailers and the Government to promote reductions in waste production to be backed by regulatory measures including an extension of producer responsibility
 - Educating consumers “on their powers to reduce waste” and initiating a London wide waste awareness campaign
 - Promoting repair and refurbishment of furniture, white goods and electronic equipment.
- 2.8 The Mayor also encourages London waste authorities to promote waste minimisation and to provide the means for householders to minimise their waste¹⁰.

The Committee’s waste minimisation seminar

- 2.9 The Committee hosted a seminar on 14 November 2002 to consider waste minimisation measures and barriers to effective minimisation. Representatives of the Environment Agency, the retail industry, London Waste Action, Waste Watch, the Women’s Environmental Network, boroughs and other interested bodies attended.
- 2.10 Presentations on waste minimisation measures in Hounslow and on the waste minimisation elements of Waste Watch’s forthcoming project at Western Riverside Waste Authority were followed by an open discussion.
- 2.11 The key issues arising from the seminar were:
- Participants welcomed the focus on waste minimisation in the Strategy
 - The importance of distinguishing between waste minimisation through changes in the production and distribution processes and minimisation as a consequence of consumer behaviour. Waste authorities are in a position to have more immediate influence on consumer behaviour
 - Waste minimisation is a challenging concept to get over to the public especially when opportunities for household waste recycling remain very variable across London. Raising public awareness of waste issues in general, and waste minimisation and avoidance measures in particular, requires subtlety, persistence and patience
- 2.12 Case studies on Hounslow and Waste Watch are provided below.

⁹ Proposal 13 on page 137 of the Strategy

¹⁰ Proposal 14 on page 138 of the Strategy

Case Study 1: Waste minimisation measures in Hounslow

Hounslow¹¹ has embarked on a three strand waste minimisation strategy comprising:

- Subsidised distribution of home composters and kitchen scrap bins - 8,700 have been issued, comprising 10% of all households. Backed by intensive advice services including seasonal newsletters and workshops, it is estimated that over 1,700 tonnes of waste was diverted from waste disposal as a result, representing 1.5% of current municipal waste
- Support for local Waste Action Groups: volunteer activists provide recycling and minimisation advice to local residents through newsletters, special events and door-to-door visits
- A Real Nappy Campaign aimed at reducing the 4% contribution of disposable nappies to black sack waste. The figure of 4% was identified in a recent waste audit. Elements of the campaign include promoting a local nappy laundering service (in partnership with neighbouring authorities), a free-month trial of reusable nappies, links with midwifery and health visitor services and real nappy nights in which the ease and performance of reusable nappies are demonstrated to new or prospective parents.

The latest data from Hounslow suggests that municipal waste arisings have stabilised, indicating that minimisation measures have already had some impact.

Case Study 2: Waste Watch's Western Riverside initiative

Much of Waste Watch's initial work on this new £4.5m five year campaign in the Western Riverside area will focus on recycling. There will also be an important minimisation strand which will include:

- A website of practical reuse and reduction advice for residents including promotion of repair and hire outlets
- An education programme targeted at all schools in the Western Riverside area
- A reusable nappies initiative
- Engagement with retailers on practical minimisation measures.

2.13 There follow proposals made by participants in the seminar which either provide some further emphasis and detail to initiatives referred to in the Strategy or which are new ideas or projects:

White goods

- Used white goods, waste electronic equipment and old furniture can be refurbished by social enterprises some employing salaried trainees. Bulky Bobs based in Liverpool and CREATE based in Liverpool and Haringey are examples of such schemes as are those operated by Wandsworth Housing Support and by Greenwich Respond. While the drivers for such schemes were often to provide basic domestic items for homeless people and to offer training and employment services, their value in diverting material from disposal (and from fly tipping) was increasingly recognised

¹¹ Hounslow's home composting scheme is highlighted as good practice on page 136 of the Strategy

Green procurement

- The importance of local authority leadership in Green Procurement was stressed both to stimulate supply of recyclates and to counter residents' scepticism

Composting

- It was suggested that householder commitment to home composting could be secured by selling subsidised composters (rather than them being offered at no cost) to engender a more committed response from prospective users

Awareness

- Real nappy campaigns require a co-ordinated approach from antenatal organisations, midwives, hospitals, health visitors and nurseries to enhance the prospects of wider take-up. The concerns of low-income families about the comparative costs of disposable and real nappies also need to be addressed

Research

- The forthcoming National Resource and Waste Forum (www.nrwf.org.uk) research into waste minimisation policy and practice might be helpful in informing the London waste minimisation programme

Collection

- An initiative in Nottinghamshire allocates householders with smaller capacity refuse bins. Householders were found not only to have recycled a greater proportion of their waste but also to have been more receptive to waste minimisation advice than householders with larger capacity bins. In Barnet a waste minimisation officer visits residents requesting an extra bin to see if increased recycling could replace the need for the bin

Composting

- The formation of a London wide initiative to support the formation and development of Local Waste Action Groups was proposed with funding potentially provided by the New Opportunities Fund. The co-ordinated development of Neighbourhood Watch schemes could also be examined as a model. Seminar participants identified a range of local community groups which might support local waste action campaigns

Award

- An annual London waste minimisation or waste prevention award was recommended as a means of encouraging innovation

Stakeholders

- Among relevant stakeholders to be engaged in the London Waste Minimisation Programme, the Women's Environmental Network and Waste Watch are both currently engaged in developing minimisation initiatives in London. The Best Value Recycling Network was also highlighted as a source of good practice.

Recommendation 2

The Mayor should develop the Strategy's emphasis on waste minimisation to include innovative schemes particularly those based on community initiatives and covering:

- Bids for New Opportunities Funding
- A composting network
- A network for reuse organisations
- Promotion of reusable nappies via midwives and the NCT
- A pan-London retailers' forum making use of the Green Procurement Strategy and developing a coherent approach for bags and packaging.

3 Kerbside recycling

3.1 This section considers:

- The Mayor's proposals for kerbside recycling
- Measures available to improve the performance of kerbside recycling.

The Mayor's proposals

- 3.2 The introduction of multi-material kerbside recycling, or its bring site equivalent for multi-occupancy properties, for all households (where practical) by April 2004 is an important objective of the Strategy¹².
- 3.3 The Strategy also contains policies and proposals aimed at strengthening the contribution to reuse and recycling of civic amenity sites in London including their comprehensive re-branding as Reuse and Recycling Centres¹³.

Measures to improve the performance of kerbside recycling

- 3.4 Data included in the Strategy shows¹⁴ that at April 2001 over half of London households were served by kerbside collections. However the data also shows a very wide variation in performance between boroughs. For example, Sutton and Hammersmith & Fulham both offer weekly kerbside collections to just over 60,000 households. While Sutton secured 10,280 tonnes in its collection, Hammersmith & Fulham managed only 3,318 tonnes. Havering is recorded as offering a weekly kerbside collection to an even greater number of properties, 70,000, and yet only 927 tonnes were collected. This equates to a lowly average of 250 grams of materials for recycling collected per household per week.
- 3.5 Policy 15¹⁵ commits the Mayor to encouraging improved participation in recycling and composting collection schemes through the use of incentives. The Mayor proposes to continue investigating the potential of incentive schemes and to identify and promulgate best practice advice to waste authorities¹⁶.
- 3.6 However it is essential that the Mayor makes a full assessment of the incentive schemes trialled in Brent and Lambeth to see whether they do offer value for money. The assessment would need to form a judgement on whether earmarking public funds for incentive schemes is more beneficial than, for example, investment in education programmes or recycling boxes. The Committee supports innovative pilots of this nature and will support them if robust data and analysis is forthcoming. As things stand, a convincing case has yet to be put forward on the cost effectiveness of incentive schemes in London.

¹² Policy 13 and Proposals 15 and 16 on page 143 of the Strategy

¹³ Policies 27 to 30 and proposals 38 to 42 on pages 196 and 197 of the Strategy

¹⁴ Table 6 on page 19 of the Strategy

¹⁵ Page 151 of the Strategy

¹⁶ Proposals 19 and 20 on page 151 of the Strategy

3.7 In identifying and promulgating best practice the Mayor might wish to consider investigating reasons for the variations in kerbside recycling performance of authorities¹⁷. These might include:

- Variations in the range of materials targeted by authorities. It would be helpful if the Strategy¹⁸ could be revised to record the types of materials targeted by kerbside schemes. The Implementation Team for the Capital Waste Minimisation Fund should also look to evaluate the bids it receives in terms of the range of materials targeted
- Poor operating performance. Simply offering a weekly kerbside collection does not guarantee service quality. It would be useful to understand the extent to which collection failure in kerbside collections is a factor in poor performance. The Best Value Indicator regime should be used to record kerbside collection performance as well as that of refuse collections
- The impact of any reduced refuse bin capacity. This could be done through the introduction of alternate week collections in parallel with weekly or fortnightly kerbside recycling collections
- Whether different types of collection container attract varying levels of participation or different volumes of recyclables
- The extent to which internal and external household space limitations and problems with vermin or vandalism have an impact on participation rates
- The way in which different targeted materials attract different levels of collection recovery and the reasons why. Many studies of the impact of household waste recycling schemes have found much higher levels of collection of paper than of cans.

3.8 Good practice guidelines might therefore include advice on action to develop both the extent and the quality of participation by:

- Improving the reliability of collection operations
- Developing the flexibility of collection methods to take account of some of the localised inconveniences identified above
- Improving collection recovery of particular targeted materials such as cans
- Promoting recycling schemes to all members of the community, especially those in socially deprived communities. Promotion is crucial – there is a continual need to reinforce messages as experiences in Canada have borne out. The Strategy refers to recent work by the Resource Recovery Forum which found that medium to low level recyclers “felt that they needed to be reminded about recycling more directly”¹⁹. Investment in a London wide network of local waste action groups to take simple locally relevant recycling messages door-to-door (as well as with promoting minimisation as proposed above) might improve the performance of recycling schemes in socially deprived areas. This could be even more effective if it were linked with measures to ensure flexibility and reliability

¹⁷ Table 6 on page 19 of the Strategy

¹⁸ Table 6 on page 19 of the Strategy

¹⁹ Paragraph 4D.26 on page 150 of the Strategy

- Making use of good practice examples drawn, for example, from the Best Value Recycling Network.

Recommendation 3

The Mayor should re-evaluate the Strategy's discussion of incentive schemes in the light of competing demands on recycling funds and the need to demonstrate value for money in any options appraisal.

4 Implementation

- 4.1 This section considers
- The timing of the Strategy
 - Targeting funds
 - The national framework
 - The Implementation Plan.

The timing of the Strategy

- 4.2 The Strategy was originally due to be published in agreed form in October 2001²⁰. This date has now been revised to May 2003²¹. The Strategy's publication has therefore been delayed by over 18 months.
- 4.3 Not only does this delay the agreement of the Strategy's action points, it also stalls the Mayor's ability to use his powers to direct London waste authorities to follow those of his waste policies which go beyond the National Waste Strategy. This is because London waste authorities are not required to follow the Mayor's Municipal Waste Management Strategy until it has been issued in agreed form.²² Until the Strategy is agreed, London waste authorities are only required to follow the National Waste Strategy and not emerging drafts of the Strategy.

Targeting funds

- 4.4 The Mayor recognises that there is a need for London "to raise money to invest in waste and recycling"²³.
- 4.5 The Mayor in partnership with London Waste Action and the Association of London Government (ALG) oversees the £21m London Recycling Fund. The Fund runs until March 2004 and aims, along with other sources of funding, to support both revenue and capital costs associated with raising waste minimisation and recycling achievement in London²⁴.
- 4.6 The Mayor also provides support through the LDA to London ReMade to enable it to develop new uses and new and expanded markets for recyclates. £5.4.m is currently being invested through SRB for the 2000 to 2004 period²⁵.

²⁰ Report of the Interim Director of Strategy to the 11 July 2000 Environment Committee

²¹ 30 September 2002 update provided by the Mayor's Office

²² Note for Environment Committee Members from GLA Legal Services, October 2001

²³ Policy 51 on page 265 of the Strategy

²⁴ Paragraph 4U.4 on page 262 of the Strategy

²⁵ Paragraph 4U. 10 on page 264 of the Strategy

- 4.7 The Committee invites the Mayor to consider the following in preparing the agreed Strategy:
- The extent to which the Implementation Team considers that it has received applications from waste authorities of sufficient quality
 - The way in which the Team ensures that the proposals it approves represent good value for money. Until this is demonstrated the Committee is doubtful that the sums being awarded will result in the Strategy's targets being achieved – there seems little point in funding schemes which are set up to fall short. There is a real danger that recycling and composting performance will remain poor despite the injection of the £21m funds
 - Whether all bids have to be tonnage based, i.e. whether X tonnes of recyclables or compostables are expected from Y or Z bid.

The national framework

- 4.8 Annex B gives the national framework within which the Strategy is being developed, focusing on two November 2002 publications:
- The Chancellor's pre Budget Statement
 - The Cabinet Office Strategy Unit publication, *Waste Not Want Not*
- 4.9 One other key driver of waste authority performance and approach is the Government's Best Value inspection regime overseen by the Audit Commission. The Best Value Performance Indicators (BVPIs) set by the Commission have become an integral part of performance management at local authority level. The current waste BVPIs are:
- Percentage of the total tonnage of household waste arisings which have been recycled
 - Percentage of the total tonnage of household waste arisings which have been sent for composting
 - Percentage of the total tonnage of household waste arisings which have been used to recover heat
 - Percentage of the total tonnage of household waste arisings which have been landfilled
 - Number of kilograms of household waste collected per head
 - Cost of waste collection per household
 - Cost of waste disposal per tonne of municipal waste
 - Percentage of population resident in the authority's area served by a kerbside collection of recyclables.

- 4.10 The Mayor should lobby for the waste BVPIs to be extended to cover:
- Green procurement. As Annexes C and D illustrate, green procurement is key to delivering the Strategy and achieving the potential targets for 2010 and 2015. Only through increased levels of green procurement can the demand for recycled products be created. Therefore national levers, such as BVPIs, are required to help local authorities focus on green procurement
 - Home composting. While there is already a BVPI for municipal composting (second bullet point of 4.9), as yet there is no target for home composting. As home composting is one of the key elements of waste minimisation (see section 2 of this response), there needs to be a recognition of this in the performance management framework for local authorities.
- 4.11 Fiscal policy plays an important part in determining waste management options chosen by waste authorities. While waste minimisation measures, composting and recycling all play a part in reducing the amount of waste going to either landfill or incineration, there will remain a proportion of residual waste which needs to be disposed of. The taxation regime in place plays a major part in determining whether the waste authority goes for either landfill or incineration.
- 4.12 Current landfill gate fees in London are between £12 and £26 per tonne exclusive of tax, while gate fees for incineration are higher at £35 to £45 per tonne. It is unlikely that the projected increase in landfill tax (possibly making landfill costs rise to £35 per tonne inclusive of tax by 2010) will make significant changes to the relative economic case for incineration. Despite higher gate fees, incineration is a cheaper option than landfill because transfer and transport costs for incineration are borne by waste authorities and also because incineration generates revenue from electricity production.
- 4.13 The Cabinet Office Strategy Unit paper, *Waste Not Want Not*, includes the recommendation that “the case for an incineration tax should be kept under review. The purpose of raising the landfill tax is not to promote incineration at the expense of all other options, but rather to send a clear signal about landfill”²⁶. Given the relative costs of the landfill and incineration options and given the potentially adverse health impacts of incineration, the Committee would like to see the Mayor go further and endorse, and lobby for, an incineration tax.

The Implementation Plan

- 4.14 Following a scrutiny recommendation from the Committee, the Strategy includes an Implementation Plan. However the Committee remains concerned about the clarity of the information presented and the likelihood of it being implemented in its current form. There are as many as 106 proposals, 40% of which (42 in total) are given as high priority and 84% of which (89 in total) are categorised as ongoing under the timescale column. The Committee’s November 2001 report recommended (Recommendation 8) that the Plan include quantifiable targets for the suggested actions. This is still not the case and we recommend that this is rectified in the agreed Strategy.

²⁶ Recommendation 14 on page 83

- 4.15 The Committee is therefore recommending that the agreed Strategy should be clearer in this important respect and to this end has produced diagrams which, in the Committee's view, would help readers of the Strategy to see the implementation plans more easily:
- Annex C shows the delivery mechanisms for the Strategy
 - Annex D illustrates the Strategy's key policy milestones.
- 4.16 The Committee's November 2001 report asked that more detail on the cost of implementing the Strategy be included. Although an independent costing assessment has been added to the Strategy, it remains divorced from a concrete set of implementation programmes for composting and recycling.

Recommendation 4

The Mayor should develop the Strategy to tackle the issue of how the £21m London Recycling Fund should be targeted and the process through which that will happen.

Recommendation 5

The Mayor should lobby Government to introduce Best Value Performance Indicators for green procurement and home composting.

Recommendation 6

The Mayor should endorse, and lobby for, an incineration tax to make incineration a less attractive option for waste authorities in recognition of its potentially adverse health impacts.

Recommendation 7

The Mayor should develop the Strategy's Implementation Plan to include quantifiable targets.

Recommendation 8

The Mayor should add to the Strategy a diagram depicting the key policy milestones in the period from the present (2002) to the planning horizon for the London Plan (2016).

Recommendation 9

The Mayor should ensure that the Strategy's assessment of implementation costs is robust, covers in detail key areas such as composting and recycling and is linked to the Implementation Plan.

Annex A

Actions taken by the Mayor in response to the Assembly's Waste Strategy recommendations

Assembly comment	Consideration	Action taken
The implementation challenge		
<p>1. Set a target for London to recycle 60% of its municipal waste by 2015 (paragraph 2.4)</p>	<p>The Mayor agrees with the Assembly that the targets should be aimed at recycling 'municipal' waste rather than 'household waste' and Policy 2 has been altered accordingly.</p> <p>The Mayor will continue to lobby Government to seek changes in legislation in order for London to achieve a 60 % municipal recycling rate by 2015. The Mayor believes that the achievement of a 60% recycling rate requires, amongst other things, the legislative changes which are outlined in section 4X. The Mayor will therefore seek comments on this recommendation as part of the consultation on the strategy.</p> <p>The Assembly Scrutiny Report refers to 'ready markets in recycled goods and short transportation distances' that make London an ideal area to aim for ambitious recycling targets. This statement itself is disputable and the report also fails to mention the myriad of other influences that will affect the achievability of a 60% recycling target. Whilst 60% recycling has been reported elsewhere in Europe and in the Americas, a rate of 60% under the same definitions of household or municipal waste and recycling, as currently measured by the UK Government, is not known. This makes comparison of recycling rates between the UK and other countries difficult. Further to this, where high recycling rates are reported in other countries there are significant differences in the economic and legislative frameworks for waste. Therefore, to make a 60% target achievable in London the Mayor is seeking changes in legislation by the UK Government in Policy 2 of the draft waste strategy. Without these changes a 60% recycling rate is not believed to be achievable and hence the Mayor will not set a target that is not achievable, but is instead proposing ways to make the high target achievable.</p>	<p>Policy 2 (page 111) developed to include reference to municipal waste and text added (paragraph 4A.7, page 112) to consult further on the Assembly suggestion for a target to be set.</p>

<p>2. Have a dual focus of waste minimisation and waste disposal in his plans for a new waste authority for London (paragraph 2.5)</p>	<p>The Mayor agrees with the Assembly's recommendation and has altered proposal 105 (previously 103) accordingly to ensure that any single joint statutory waste disposal authority will be responsible for reducing, reprocessing and otherwise disposing of London's waste.</p>	<p>Proposal 105 (page 285) amended.</p>
<p>3. Undertake a separate consultation exercise with stakeholders about his plans for a single London waste disposal authority (paragraph 2.5)</p>	<p>The Mayor concurs with the Assembly that improving London's recycling performance is of paramount importance. Therefore the Mayor intends to seek support in principle for the idea of a single London waste disposal authority during the public consultation on the strategy. If this is forthcoming then further specific consultation on detailed proposals will be undertaken.</p>	<p>Comments are requested as part of the public consultation to feed into any further detailed proposals (page 284 paragraph 4X.42)</p>
<p>4. Work with appropriate partners to set and monitor standards for recycled goods (paragraph 2.6)</p>	<p>The Mayor agrees with the Assembly on the importance of developing partnerships in order to set and monitor standards for recycled goods.</p> <p>The Waste and Resources Action Programme (WRAP) and London ReMade have both made advances in this area. The Mayor agrees that this is an area of key importance and will, where appropriate work, with WRAP and London ReMade and other relevant partners on this issue. Therefore section 4Q has been re-edited and proposal 75 introduced to incorporate this recommendation.</p>	<p>Section 4Q has been revised and proposal 75 added.</p>
<p>Public participation</p>		
<p>5. Place greater emphasis on the role London's community sector can play in delivering the recycling and minimisation-led Strategy (paragraph 2.12)</p>	<p>The Mayor concurs with the Assembly and has edited the strategy emphasising the importance of the community sector as a key stakeholder in waste minimisation and recycling.</p>	<p>Role of the community sector added (paragraph 3.51 page 79).</p>

<p>6. Demonstrate his support for recycling by leading a campaign to publicise its importance (paragraph 2.14)</p>	<p>The Mayor agrees with the comments made by the Assembly on the importance of his role in leading a waste educational and awareness campaign in London. The Mayor wishes to support and develop existing campaigns (NWA – Rethink Rubbish) and work in partnership with key stakeholders to resource a London-wide single message on waste minimisation and recycling. These objectives are outlined in Policy 44 and Proposal 66 of the public consultation version of the strategy.</p> <p>Some resources from the GLA budgets will be required to lever external funding to enable this campaign. The Assembly are asked to support Core Budget bids to this effect, to enable the Mayor to deliver this recommendation.</p> <p>The Mayor is also leading a bid to the London Recycling Fund to develop a London-wide educational campaign</p>	<p>Section 4P revised accordingly.</p>
<p>The timetable for implementation</p>		
<p>7. Issue his best practice review of recycling, composting and promotion to waste authorities by April 2002 (paragraph 2.21)</p>	<p>The Mayor supports the Assembly in recognising the urgent need to identify and develop ‘best practice’ recycling, composting and promotion schemes for London. However, due to a lack of staff resources and the delay in receiving Assembly approval to increasing staffing levels, this was not possible within the recommended timescale.</p> <p>The new officer responsible for this work will be in post by November 2002, and the best practice review will then be produced as quickly as possible.</p>	<p>Additional staff have been recruited to undertake this work.</p>
<p>8. Publish a full timetable for his recycling-led Strategy, with quantifiable targets for each of the implementation programme, so that London waste authorities are aware of the key milestones. The timetable will need to identify at what point the Strategy will be reviewed (paragraph 2.24)</p>	<p>The Mayor concurs with the Assembly and has set out an Implementation Plan (Table 28, pages 295 - 311) within the public consultation version of the draft strategy). This identifies for each proposal a timescale for implementation, the responsible organisation and the degree of priority.</p> <p>In addition, paragraph 3.15 sets out the timescale when the adopted version of the strategy will be reviewed. In 2005/6 progress towards the strategy will be reviewed in the light of experience of working towards the Proposals and Policies, and statutory target</p>	<p>See Implementation Plan (table 28, pages 295 – 311) and paragraph 3.15.</p>

Implementation costs and infrastructure		
9. Include more detail in the Strategy on implementation costs, clearly identifying key dates in the process and the costs attached to specific elements of implementation (paragraph 2.40)	Whilst an initial cost assessment was completed for the Assembly's version of the draft strategy, the Mayor agrees with the Assembly that a more detailed costs assessment was required. The Mayor therefore commissioned consultants to analyse the implementation costs associated with five separate scenarios. These costs are summarised in chapter five of the public consultation draft of the strategy and the full report on costs is available on request, forming part of the public consultation.	Independent costing assessment is available as part of the consultation.
10. Issue guidance to waste authorities on sources of finance as soon as the Strategy is finalised in November 2002 (paragraph 2.40).	<p>The Mayor, in partnership with the ALG and London Waste Action, has successfully negotiated London's fair share of DEFRA's Waste Minimisation and Recycling Fund. The partnership has secured £21.3 million to fund waste minimisation and recycling projects in London over the next two years. Guidance on how waste authorities can bid for this money and or seek funding from other sources is set out in section 4U (funding opportunities) of the strategy.</p> <p>The Implementation Team set up by the partnership is also responsible on behalf of the partnership for giving advice to waste authorities on other sources of funding (paragraph 4U.7 page 263).</p>	Section 4U on Funding Opportunities has been edited to advise on London Recycling Fund monies and role of Implementation Team in providing advice to authorities.
The Spatial Development Strategy		
11. Ensure that the Spatial Development Strategy specifies the level of recycling and composting facilities in each neighbourhood the Mayor expects London Boroughs to include in their Unitary Development Plans (paragraph 2.41)	The Mayor welcomes the Assembly's comment and the draft London Plan has since been revised to ensure that "Boroughs in reviewing UDPs should allocate sufficient land for waste management and disposal." The Mayor will promote the co-ordination of the boroughs' waste policies by producing Supplementary Planning Guidance on planning for waste and press for powers to prepare a London-wide Waste Local Plan.	Policy included in the Draft London Plan.

Lessons learnt		
12. Stress that London wants to take the lead in recycling and composting rather than relying on other cities and regions to achieve a rate of 60% first (paragraph 3.16).	The Mayor agrees with the Assembly that London should take a world lead in recycling and composting, and recognises the need to learn from the successes and failures of schemes within other world cities. The Mayor accepts the Assembly's views in extending the comparison to include the world cities of New York and Seattle. These cities together with a more detailed analysis on Tokyo, Berlin and Canberra are included in the public consultation version of the strategy (Chapter 2, page 57- 64).	The section on comparisons with other cities has been reviewed (Chapter 2 page 57-64) and comparison with New York, Seattle, Berlin and Canberra added.
The growth in waste		
13. Not assume waste growth until he has extensive and reliable data to support that assumption (paragraph 4.11).	<p>The strategy has not assumed any particular level of waste growth or reduction. Various levels of waste growth and the potential for waste minimisation have been modelled to provide an indication of performance in four waste management scenarios (page 46).</p> <p>The strategy looks to reduce waste arisings. All of the current data available suggests that municipal waste has increased in the recent past. The Mayor is therefore putting in place measures to prevent this occurring in the future, as far as possible. However, there is considerable uncertainty about what will happen in the future. The strategy needs to consider the possibility that the amount of municipal waste may continue to increase. It would be seriously deficient and out of line with the national waste strategy if, as recommended, it assumed no waste growth without considerable justification. The Environment Agency has provided further comment on this recommendation by the Assembly that "There is plenty of evidences that waste will continue to grow and it would be a disaster to base any strategy on no growth."</p> <p>The strategy needs to take into account the projected increase in the number of households in London.</p>	No particular level of waste growth has been assumed in the strategy.

Waste composition		
<p>14. Involve all of London's waste authorities in a year long study looking at the composition of London's waste, running from January 2002 to December 2002 and informing future versions of the Strategy (paragraph 4.20).</p>	<p>The Mayor accepts that London together with the UK has poor understanding on the composition of municipal waste. To address this issue the Mayor will work with the Environment Agency to undertake a detailed study of London's municipal waste. This is outlined in the public consultation version of the strategy - Policy 4 and Proposal 6.</p> <p>Resources were not available to undertake the recommendation in the timescale suggested by the Assembly. Resources are being sought to undertake the work in the 2003/4 financial year.</p>	<p>Proposal 6 (page 117) proposes a detailed study of the composition of London's municipal waste.</p>
<p>15. Use a composition rate of 75% as the basis for waste planning in the Strategy until the results of the study are available (paragraph 4.20)</p>	<p>The Mayor accepts the inadequacy of information about the waste composition of municipal waste and the difficulties in establishing what proportion of the waste can be recycled (4A.11 page 116) and as such no assumption of recyclability has been assumed in the modelling in Chapter 2. The Assembly's recommended recyclability rate of 75% has been used in Figure 13 (page 45) in determining the required coverage, participation and capture rates in order to deliver a 60% recycling rate.</p>	<p>The Assembly's recommended recyclability rate has been used in Figure 13 (page 45).</p>

Regulation and public health		
<p>16. Develop a full implementation plan for the Strategy to show that his support for recycling and his opposition to further incineration are workable in practice (paragraph 5.7).</p>	<p>An implementation plan has been included within the public consultation draft of the strategy (Table 28, pages 295 – 311).</p> <p>The modelling in Chapter 2 indicates that, with effective waste minimisation measures in place and recycling rates of at least the target levels, there would be no need to introduce any significant additional recovery capacity before 2013.</p>	<p>Implementation plan developed (Table 28, pages 295 – 311).</p>
<p>17. Revise the Strategy to include a commitment to examine the Environment Agency's regulation and inspection regime. Londoners need to be reassured that sufficient measures are being taken to protect their health (paragraph 5.7)</p>	<p>The Mayor does not have the power to scrutinise the work of the Environment Agency. However, the Mayor shares the Assembly's concerns that Londoners need to be reassured that sufficient measures are being taken to protect their health. The Mayor will keep under review work being undertaken by the Environment Agency and other developments in emissions control, monitoring and health impacts and, where appropriate, will press the organisations responsible to adopt new techniques (paragraph 4F.6 page 162). This approach is reflected in proposal 29.</p>	<p>See proposal 29.</p>
<p>18. Urge the Edmonton and SELCHP incineration plants to make available their emissions monitoring data to Londoners via the World Wide Web as soon as the Strategy is finalised in November 2002 (paragraph 5.7).</p>	<p>SELCHP and London Waste Ltd are now making the results of air pollution monitoring available on the internet (paragraph 4F.6 page 162).</p>	<p>Emissions monitoring data now available on the world wide web (paragraph 4F.6 page 162).</p>

The treatment of residual waste		
<p>19. Confine the Strategy's consideration of a best practical environmental option for waste disposal to residual waste (paragraph 5.11)</p>	<p>Whilst the Mayor shares some of the concerns expressed by the Assembly on the application of BPEO, the Mayor needs to consider the Government's national Waste Strategy 2000. BPEO is a major tenet behind the policies contained within the national strategy. To ignore this principle in considering recycling and composting proposals may leave the Mayor open to challenge.</p> <p>If the Mayor adopted the Assembly's recommendation and only considered BPEO for residual waste then it could leave the decision making process open to abuse, as there would be no clear definition of what is residual waste and therefore waste which possibly should have been minimised, recycled or composted may not be. The decision making process needs to be open to scrutiny.</p> <p>Therefore discussion of BPEO in section 4A highlights the need to consider the potential for the BPEO to change as the availability of infrastructure for recyclables changes (paragraph 4A.23 page 120). In addition it is pointed out that decision-making should take into account not only the direct impacts but also the indirect effect (paragraph 4A.28 page 122). Specifically the discussion states that "in balancing any possible conflicts between achieving greater self-sufficiency in the short term and the development of robust recycling infrastructure in the longer term, preference should be given to longer term recycling." (paragraph 4A.17 page 118).</p>	<p>Revisions to section 4A seek to alleviate the potential concerns raised by the Assembly regarding the application of BPEO.</p>
<p>20. Develop the Strategy's approach to residual waste issues to focus on alternatives to thermal treatment (paragraph 5.16)</p>	<p>The Mayor accepts the Assembly's comments on developing alternatives to the thermal treatment of residual waste and has introduced a section on Mechanical Biological Treatment in addition to the discussion of Anaerobic Digestion.</p>	<p>Section 4F (Pages 160 – 179) amended to include further information on alternatives to thermal treatment.</p>

The national framework

This annex covers:

- The Chancellor's pre Budget Statement, November 2002
- Cabinet Office Strategy Unit publication, *Waste Not Want Not*, November 2002
- Waste Emissions and Trading Bill
- Doorstep Recycling Bill
- Composting Issues.

The Chancellor's Pre Budget Statement (PBS), November 2002

Landfill Tax

The Government will consult on increasing the landfill tax escalator from a £1 per annum increase to a £3 per annum increase from 2005-6. If implemented landfill tax would rise to £18 per tonne from 1 April 2005.²⁷

Landfill Tax Credit Scheme (LTCS)

LTCS funding for waste management, as opposed to landfill remediation and community environmental projects, currently under Category C will be removed from the management of Environmental Bodies and transferred to public spending. £100m for sustainable waste management will be added to public spending from 2003-4, rising to £110m in 2005-6. The funds will be allocated according to a 'robust delivery mechanism' taking account of the priorities for waste policy in the Cabinet Office Strategy Unit's paper *Waste Not Want Not*.²⁸

Waste Incineration Tax

The PBS states that "the Government will commission a review of the environmental and health effects of all waste management and disposal options". The use of economic instruments to help shape incineration and other waste management options will then be considered in consultation with stakeholders.²⁹

Waste Reduction

The PBS appears to endorse the Cabinet Office Strategy Unit recommendation that local authorities have discretion to introduce incentives or charges to reward or penalise waste behaviour where "adequate recycling facilities are available".³⁰

²⁷ PBS 7.51

²⁸ PBS 7.56

²⁹ PBS 7.57

³⁰ PBS 7.58

Cabinet Office Strategy Unit publication, *Waste Not Want Not*, November 2002

The Cabinet Office Strategy Unit publication *Waste Not Want Not* was issued on the same day as the PBS. The consultation draft, issued in summer 2002, provoked hostility because of its apparent endorsement of variable waste charging or bin taxing.

Bin tax

In fact the paper recommends local authorities to experiment with a range of measures, including incentives of the type tried out by the Mayor in Brent and Lambeth, as well as non-Council Tax charging schemes based on weight. Another possibility is a slightly more sophisticated variable charges based on the production of unsorted waste.

Other recommendations

The Strategy Unit's other recommendations by and large complement rather than contradict the views of the Mayor and the Committee:

- Waste growth should be curbed
- Kerbside collections and other measures should be introduced to divert household waste into recycling (45%) and composting (50%)
- Tax incentives should be used to stimulate recycled products and processes
- Tighter producer responsibility should be negotiated on a voluntary basis and landfill tax should rise in line with the escalator proposals
- There should be more research into waste management options especially new technologies
- The community sector should educate householders and encourage them to do more
- DEFRA, industry and councils should work much more closely together to highlight good practice
- Landfill tax resources should be brought into public spending to provide at least £100m supplementary resources to deliver this tighter more focused programme.

The Mayor should be well placed to deliver an appropriate response from London. Some further finessing of the Strategy might be necessary to acknowledge and establish a London angle on these proposals.

The report suggests boosting WRAP's role into the realms of waste minimisation. Its traditional roles of promoting R&D and developing supply and demand for recyclates and recycled products will remain. As the Committee's waste minimisation seminar showed, waste minimisation is a crowded market with the Women's Environmental Network, Waste Watch, National Waste Awareness and the Environment Council all already prominent in the field. Whether encouraging WRAP to go down this road will be beneficial remains to be seen.

Waste Emissions and Trading (WET) Bill

Landfill targets (allowances) for Waste Disposal Authorities (WDAs)

The Bill requires the Secretary of State in consultation with the devolved administrations in Scotland, Wales and Northern Ireland to set annual landfill targets for biodegradable municipal waste (BMW). In each home country, waste disposal authorities will then be allocated BMW allowances. This will have the effect of setting landfill directive targets at the level of the WDA. Up to now WDAs have only had targets set in household waste as part of the BVPI Waste Strategy 2000 scheme which only partially addresses the requirements to reduce BMW going to landfill. Total BMW allowances must not exceed the national targets for each year.

Tradable permits

WDAs unable to meet their allowance targets will be able to buy (or be given) permits for landfill from other WDAs who have landfilled less than their allowance.

Compliance

WDAs who exceed their allowance and fail to make permit provision will be penalised. If the WDA exceeds its allowance in a year where the home government also fails to meet its BMW target, the WDA will receive a supplementary fine.

Trade in permits is limited to WDAs. Trades, transfers and charges are regulated and monitored by the Environment Agency or equivalent. Landfill operators are required to supply records to facilitate the monitoring of allowances.

Section 16 (7) and (8) requires the Mayor's strategy to take account of the WET Bill.

Doorstep Recycling Bill

Joan Ruddock MP has been drawn fifth in the Private Members Bill ballot and will introduce a Doorstep Recycling Bill prepared by Friends of the Earth.

The Bill (echoing the Mayor's Strategy commitment) proposes to lay a statutory responsibility on Waste Collection Authorities to provide doorstep collections of paper, glass and cans with plastics and organics to follow.

Composting Issues

The BSI compost standard sponsored by WRAP specifies recommended techniques, temperatures, time periods, monitoring and sampling systems for non-home composted BMW. It has been agreed but has not yet been printed and distributed.

However it may be overtaken by proposals in a new DEFRA consultation on controls of catering or kitchen waste which might contain meat. To prevent FMD, BSE and other pathogen transmission, and to comply with the forthcoming EU Animal By Products Regulation, which takes effect on 30 April 2003, the consultation proposes requiring composting operations to take place in-vessel for at least one week, followed by an eleven day period outside the vessel.

Annex C

Delivery mechanisms for the Strategy

Strategy and Advice

Government

EU } Set targets and monitor
DEFRA

DTI - Drives through LDA
HMT - Fiscal incentives - landfill tax
- incineration tax

- Minimisation
- Recycling
- Procurement

London

Mayor/GLA team
RTAB } Set and monitor targets for :-
LWA }

Set action plan
Monitor contracts
Review progress
Agree Landfill Permit Allowances

- Minimisation
- Collection
- Procurement

Delivery

WRAP
ALG/GLA
LWA
LAS
WDA
Waste industry/IWM

- agree action plan
- agree targets
- co-ordinate waste awareness education
- agree landfill permit allowances

Implementation Team

Procurement

Green Procurement

Mayor's Code
LAs / IDeA
GLA family
Green Spec
Remade
Packaging Industry
ICE/CIOB/RIBA
WRAP

Reprocessing

London Remade
LDA
GLE
Business Link
Waste Alert
WRAP

Waste Minimisation

WDAs
LAs
Packaging Industry
Waste Alert/Watch/WEN
Composting Assoc.
Supermarkets/retailers
Manufacturers

Collection

Best Practice

BVWN
CIEH
LCRN
LRF
IDeA

Collection

WDAs
LAs
LCRN
Supermarkets
Contractors

Annex D

Key policy milestones for London's waste: 2002 - 2016

Key policy milestones for London's waste: 2002 - 2016

