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Rt Hon Margaret Beckett MP
Secretary of State for the Environment Food and Rural Affairs
Nobel House
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29th January 2003

Dear Secretary of State

Report by Strategy Unit, Waste Not Want Not

I enclose a number of comments from NAWDO on the above report.

For your information NAWDO is a local government officer group whose membership is confined to the most senior manager in a waste disposal authority solely responsible for waste management. Membership includes most waste disposal authorities including shire counties, unitary authorities and statutory joint disposal authorities. We have about 110 members.

As you can appreciate, all waste management in disposal authorities is managed and planned, with a few exceptions only, by NAWDO members. Our members are therefore anxious to ensure that any proposals adopted by the Government, following the SU report, are appropriate, practical, cost effective and deliverable. To ensure this occurs, we would like to be fully involved in the consideration of options for the future. We not only want to be involved through consultation but to have regular meetings with key DEFRA personnel to assist progress. This use to occur some years ago when the DoE was responsible for waste management. The impression we get is that DEFRA spread their resources thinly by listening to, and endeavouring to accommodate all stakeholders, rather than concentrating on the main players, which in the case of municipal waste management are the waste disposal authorities as represented by NAWDO.

Our concern in this area, in part, arises from how the work of the Strategy Unit was progressed. There was no local authority representative on the "Team" and no officers on the Advisory Group. WRAP were represented on the Team and have done very nicely out of the SU report. We wish we had been in the same position.

Two areas not covered in the SU report are:-

- a) The Waste and Emissions Trading Bill

b) Removal of the requirement of waste disposal authorities to only use contractors for waste management.

With respect to (a), we passed comments to DEFRA with respect to the particular problem we have in two tier areas and although we did not receive a satisfactory response, a number of amendments which would achieve the desired effect have been put forward in the Lords and, hopefully, these will be supported by the Government.

With respect to (b), we were promised when the Best Value legislation was introduced that the requirement for waste disposal authorities to only use contractors would be removed but we are still waiting.

Yours faithfully

R H Burton
Chairman of NAWDO

Comments from NAWDO on report of Strategy Unit, Waste Not Want Not

Overall comments

The SU has somewhat limited, unambitious, expectations for its Strategy to deliver reductions in waste. The report clearly lists the measures that will reduce the increase from 3% to 2% (home composting etc.) and so the actual reduction has a practical base. However, it would have been useful if the report had given an estimate as to what reductions could be achieved overall through some of the other measures proposed. Of course the report, by only highlighting a small reduction in increases in waste, endorses the fact that waste reduction is not easy.

The report recommends the setting up of a number of groups but these could fragment waste management and make delivery more complicated.

The report sits on the fence with regard to waste incineration.

A large number of the proposals are already being considered or developed. i.e. they are not new, however, the report will ensure that some are pursued with more vigour.

Comment on recommendations

1 **Charging/Incentives** – Supported

Councils must not only be given powers to charge for collection and subsequent disposal but also charge at public household waste sites. Councils must also be given the powers to specify the type and size of vehicles that can be accepted at such sites. Most councils have restrictions but the legality of these is sometimes questioned.

2 **Voluntary agreements with industry**, DEFRA/DTI, – supported

3 **Incentives for re-use**, DEFRA/WRAP, – supported

4 **Incentives to encourage environmentally –friendly products**
HMT/DEFRA, supported.

5 **Promotion of secondary resources**, DTI/DEFRA/WRAP/Industry/BSI, - supported

6 **Revise building regs**, ODPM, to allow a recycling centre per 50 houses – Principal supported but consider 50 houses is too low. 400 to 500 is considered more sensible.

7 **Internal Government targets for recyclables plus trained procurement officer**, OGC and other Depts, – supported.

8 **Voluntary environmental procurement targets for LAs**, ODPM and LGA – supported.

9 **Development of alternative BV indicators**, DEFRA/ODPM/Audit Commission/WRAP.

Local authorities and CIPFA should also be involved. Local authorities have been completing CIPFA statistics for over 20 years and know more about statistics on municipal waste than all the other organisations put together. Also the current indicator of waste per head does show how waste quantities are changing. The SU clearly does not expect significant reductions in waste (3% increase to 2% increase) and therefore waste reduction targets in terms of percentages, if set, will be very small. Also, there is another myth that the report should have contained, which is that local authorities control the amounts of waste generated by the public. They do not. LAs can only, generally, encourage waste reduction by restricting what is accepted. With respect to cost per tonne, some composting processes are cheaper than landfill.

The Government must publish their proposals for future recycling/composting performance standards for years after 2005/06 as soon as possible to enable proper planning.

10 **Quality standards for compost**, DEFRA, – supported

11 **Increase in landfill tax**, HMT, – This is considered inevitable when considering how the UK compares with Europe. However, waste disposal authorities should have easy access to funds generated by the landfill tax to develop sustainable waste management. Access should not be just confined to those funds arising from the Landfill Tax Credit Scheme. Increases in landfill tax could increase the amount of commercial waste unlawfully entering the domestic waste stream. This has been found to be the case by NAWDO members in the past and this will work against waste minimisation.

12 **Ban on landfilling recyclables**, DEFRA/DTI, - This needs clarification. It is not clear how it would work as there will always be residual quantities of such things as paper in the waste. Some people will not be prepared to recycle (using kerbside systems) unless draconian measures are introduced.

13 **Waste crimes, review guidance to magistrates**, Home Office/Lord Chancellors Dept, - supported.

14 **Incineration Tax kept under review**, - not supported. To enable sensible planning for waste management, the Government should make a clear statement as to whether it intends to tax incineration and other forms of thermal treatment. Also, the evidence in the report shows that incineration does not harm the environment and it is considered that the SU should have been more positive on the merits of incineration in the form of a recommendation. As detailed in figure 10, high incineration has a better overall ranking than maximum recycling. Also, on page 50 of the report deaths from incineration are stated to be the same as deaths from lightning strikes. I do not believe this is correct. It is my understanding that several people are killed each year by lightning strikes but there is no evidence that there is a similar death rate from incineration.

- 15 **Independent Body to examine literature of different health options** – Not supported. This is the role of the Environment Agency using other experts as they consider appropriate. These days there seems to be no expert who everybody considers to be independent.
- 16 **WRAP should take forward measures to reduce waste volumes** - We are not sure whether it is appropriate for WRAP's responsibility to be extended into this area. At the moment their responsibility is mainly markets. Is the SU suggesting that the Government provides WRAP with money to then give LAs to finance these schemes? We are not convinced that home composting is as cost effective and waste reducing as the report makes out. A number of authorities have tried home composting, delivering containers accordingly, with variable levels of success.
- 17 **WRAP should take forward measures to increase recycling and composting through advice to LAs** – Supported provided the advice is free to LAs, otherwise their services would have to be compared in value for money terms with those provided by other training organisations and consultants. The markets aspect with respect to organics is supported. The focus on kerbside collection of organics is interesting when put against the proposed biowaste directive and Animal By-products order. NAWDO's understanding is that at this stage, future markets for products from kerbside collected organics can not be guaranteed unless you limit your expectation to the production of a biologically stable material which satisfies the landfill directive. Government therefore need to balance objectives of the ABPO/LF Directive/Biowaste Directive with desires for recycling and ensure we are not developing conflicting strategies. Separate kerbside collection of organics is only sustainable if there is value added. This will only be the case if the process and collection costs are affordable, and the product is potentially marketable for spreading on land as a soil conditioner/compost therefore can we infer from the SU report that this will be the case?
- 18 **WRAP should take forward two education and awareness programmes** – On page 96 of the original report it states that “it is clear that a further large-scale generic campaign would be effective”. It is not considered that there is evidence to support the latter. The final version of the report states on page 93 “it is not clear that a further-large scale generic campaign would in itself be effective”. It is presumed the latter version is the view of the SU, however, if the Government is prepared to fund large national and local education and awareness programmes then this would be fully supported.
- 19 **Envirowise** - industry issue, no views
- 20 **Prepare data and research strategy**, DEFRA/EA, – LAs should be included as they provide most of the data on municipal waste. NAWDO is already represented on the EA waste analysis programme.
- 21 **Pilots for new technologies**, DEFRA/DTI/Industry/LAs – supported.
- 22 **Challenge Fund should be retained/open up to private sector** – We

support the Government giving additional funding to LAs to support improvements in waste management. However, the fund needs to be distributed on a fair basis. It would be unfair if a local authority did not to achieve its performance standard because it did not get funding, if, on the other hand, another authority achieved its standard by getting challenge funding. Also distribution of funding to the private sector should only take place with the approval of the LA partner.

- 23 **DEFRA should accelerate work to improve the delivery of waste PFI projects** – supported.
- 24 **LTCS** – transfer of two thirds of funding to public expenditure schemes – The Government has already consulted on changes to the scheme and local authorities will have expressed their views. In his Pre-Budget statement the Chancellor of the Exchequer has indicated that he intends to adopt the approach proposed by the SU although the Environmental Trusts are fighting a rearguard action. If the Government adopts the SU recommendation then LAs would want easy access to these funds. It is understood that WRAP may be given responsibility for distributing the money and this will give the NGO even more power and control over local authorities which is a cause for concern. LAs do not want to replace having to go “cap in hand” to Environmental Trusts linked to the main landfill companies to a similar situation with a NGO.
- 25 **Redirection of tax revenues to incentivise investment in recycling etc.** HMT/DEFRA/Government Depts. – supported
- 26 **Review of DEFRA** – supported. It is presumed that one reason for the SU becoming involved in this work was because DEFRA was not delivering. Over the years LAs have had varying support from the main Government department dealing with waste. Some of the variation is due to personalities and the attitude of civic servants to local authorities – are we there to police them or help them! It is also due to the fact that there appears to be too many career civil servants who flit from one subject area to another and, just as they are becoming useful to LAs, move on. DEFRA/DoE lost a large source of expertise when the EA were set up and this should be addressed. LAs should be involved in the review as a main stakeholder.
- 27 **Focus waste policy in one department**, DEFRA/DTI, – a review is supported but the current situation is not considered a major problem for municipal waste with respect to the DTI, however, ODPM seems to be getting involved and should be included in the review.
- 28 **Delivery Task Force** – It is considered that this should be one of the functions of DEFRA. We do not want yet another organisation to deal with. DEFRA could seek secondments from LAs, WRAP etc as they consider appropriate. The SU is somewhat naive in thinking that LAs do not know where to find consultants. In fact if the SU had more meetings with LAs as part of its study then it would have been better informed.
- 29 **WRAP should be allocated additional funding** – DEFRA should first evaluate the effectiveness of WRAP before supplying additional funding.

They have certainly placed a lot of research contracts but most authorities have seen no improvements. They also appear to be competing with ReMade schemes. Are they also to take over the National Waste Awareness initiative?

30 **Joint industry forum** , DEFRA etc. If the purpose is to discuss the management of industrial waste then this is supported. If its purpose impinges on the management of municipal waste then LAs should be included.

31 **DEFRA/ODPM to carry out joint review to agree measures to encourage tiers of LAs to work together** – It is considered that a working party consisting of 3 collection service managers and 3 disposal service managers should be formed, under the auspices of the LGA, chaired by a civil servant from DEFRA (or ODPM), to develop a way forward. WCAs and WDAs know the problem areas only too well and they should be able to formulate improved arrangements.

Notwithstanding the above comment, NAWDO considers that the recycling credit scheme should cease, except with respect to third parties, as this works against cooperation between tiers. As a less severe option for WCAs, it is suggested that the landfill tax element of recycling credit payments should be held at current levels and not increased when the landfill tax increases. Also NAWDO fully supports WDAs being given more powers to direct WCAs as this will also be required to ensure the satisfactory implementation of the Waste Trading and Emissions legislation. The changes need careful consideration of a penalty regime, should a WCA not comply with a direction, and the need for arbitration.

NAWDO supports one statutory waste plan.

32 **ODPM should revise PPG10 as a priority** – supported

33 **Create a High Level Steering Committee** - The setting up of such a Committee in part depends on whether the Government accepts the recommendations in the report and the finance and changes that are needed to move forward. NAWDO would only support a Steering Committee that has a large representation from local authorities (one third to one half) since it is LAs who manage municipal waste. If the S of S trusts her Department to oversee and monitor waste services then there should be no need for yet another committee.

34 **ODPM/DERFA should ensure realistic penalties** – Supported