



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Strategic Development  
Environment Agency

29 June 09

Dear Sir or Madam,

### **Consultation Response – Environment Agency Corporate Strategy**

I am writing to present the LARAC response to the Environment Agency's Corporate Strategy Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC welcomes the strategy. However, it feels that successes in the light of the main challenge identified in the introduction, that of climate change, are not best measured by considering the environmental media of air, land and water separately. Therefore, the inclusion of overall success measures relating to the central aim of tackling climate change would be useful in addition to those for the environmental media.

Overleaf are our detailed comments relating to each individual aim.

If you have any queries on this response or would like to discuss the matter further then please contact me on 07748749137 or [khelwig@dsl.pipex.com](mailto:khelwig@dsl.pipex.com).

Yours faithfully,

Karin Helwig  
LARAC Policy Support Officer



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GREEN GLASS

## **Consultation Response – Environment Agency Corporate Strategy**

(Introduction)

### **1. Acts to reduce climate change and its consequences; b. to achieve this we will...)**

LARAC wished to point out that emissions from waste are not included in EU ETS or in CRC agreements. It would therefore argue that perhaps a drive towards sustainable of waste management could serve as a tool to achieve the first Aim and should be mentioned explicitly in this section.

Working with the community is explicit in the strategy in relation to flooding, but not in relation to waste (or indeed energy usage, as CRC and ETS do not apply to domestic use).

### **2. Protect and improve air, land and water quality b. To achieve this we will...**

There are opportunities for the restoration of soils by addition of organic matter through the use of compost, provided adequate safeguards against pollutants are in place.

c. We will know when we are succeeding when...

Although such soil improvement could come under 'More rural land is covered by environmental agreements....' it may be beneficial to make explicit the potential for green waste as a source of soil organic matter. Carbon storage in soils is a success measure in the strategy, and encouraging the use of compost is a tool by which to increase this.

### **3. Put people and communities at the heart of what we do a. Our aims...**

LARAC deems that people should be encouraged not just to care for the natural environment they live in, but also to live sustainably by using less resources, creating less waste and disposing of their waste in as sustainable a way as possible.

### **3. Work with businesses and the public sector to use resources wisely**

LARAC welcomes the aim of breaking the link between production, resource use and waste generation. This link has already been broken successfully in other European countries, and the UK should indeed aim to follow suit. LARAC would add that the aim could affect on not just businesses and the public sector, but



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also the public – through their purchasing behaviour. After all, the 3rd aim seeks "to put the people at the heart of what [the EA does]".