



Local Authority Recycling Advisory Committee

Office of the Deputy Prime Minister
Local Govt. Quality and Performance
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Best Value Performance Indicators 2005/06: Consultation – Response concerning “waste” indicators.

Thank you for the opportunity to respond to the paper on the BVPIs 2005/06 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, including 373 in England, 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 Authorities.

This response includes views of local authority waste practitioners that were solicited through a survey of our members, a copy of which along with a summary of the results is attached at Appendix 1.

The overriding concern from LARAC members is the additional reporting may be unnecessary and onerous, and a duplication of the information already provided via existing reporting mechanisms e.g. WasteDataFlow.

Please find below the individual response for each waste BVPI.

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BVPI number:	BV (X18)
Comments on BVPI:	<p>LARAC supports the introduction of a BVPI for reuse in order to recognise and measure the contribution that reuse is making to more sustainable waste management. However, a number of members have raised concerns over how the amounts will be measured to ensure consistency in reporting (especially in light of proposals to pay reuse credits in the Clean Neighbourhoods consultation).</p> <p>Members are also keen to establish exactly which materials can be included within this BVPI, and how to define the difference between textiles that are reused as opposed to recycled.</p> <p>LARAC would like to work with Government and other partners in developing a clear and consistent methodology and to also ensure that the method of monitoring and measuring the amounts reused is</p>



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	not too onerous on local authorities. This needs to be reflected in consideration of the amount of reuse which may be low in comparison to (for example) amounts recycled/composted.
Comments on proposed definition:	<p>The amount “sent for” reuse may not necessarily be the actual amount “reused” as there could be some wastage in the process of refurbishment/repair.</p> <p>Amounts of reuse currently carried out by LARAC members are quite small in comparison to amounts recycled/composted. Therefore it may be also considered that measuring this BVPI in percentage terms may be too small to be meaningful.</p> <p>Members responding to question 2 of the survey stated that in the majority of cases, measurement for reuse is based on system of standard weights and it is the actual amount that is reused/delivered to the end consumer which is measured, rather than the amount “sent for reuse”.</p>
Comments on proposed target:	There is no target set at present – are there any plans to set a target under this BVPI?

BVPI number:	BV 82a
Comments on BVPI:	<p>LARAC has concerns over the duplication of information that will already be provided via the WasteDataFlow system. Whilst recording tonnages as well as percentages may not appear to be particularly onerous, this seems an unnecessary additional burden on local authorities.</p> <p>Concern has also been raised over the possibility that high tonnages will be considered “good” whilst conflicting with the concept of waste minimisation. Members also suggest that tonnages are meaningless for comparative purposes as population (and therefore tonnage arising) varies amongst authorities.</p> <p>LARAC does not see the value in breaking down this indicator into types of materials. There may be problems where some authorities operate co-mingled collections and therefore may not be able to supply accurate or consistent data.</p> <p>The consultation also recommends that BV91 is amended in line with the Household Waste Recycling Act 2003 which also requests a breakdown in material types (see later comments) and therefore this seems to be a duplication of reporting within the BVPIs.</p>
Comments on proposed definition:	LARAC does not support the proposal to break this indicator down into material types (see comment above).



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	LARAC does not see the benefit in reporting total tonnage (as well as percentage) within this BVPI when reporting mechanisms already exist, i.e. WasteDataFlow.
Comments on proposed target:	None at present. Awaiting review of national targets.

BVPI numbers:	BV 82b, c and d
Comments on BVPI:	LARAC has concerns over the duplication of information that will already be provided via the WasteDataFlow system. Whilst recording tonnages as well as percentages may not appear to be particularly onerous, this seems an unnecessary additional burden on local authorities for all 3 BVPIs.
Comments on proposed definition:	LARAC does not see the benefit in reporting total tonnage (as well as percentage) within these BVPIs when reporting mechanisms already exist, i.e. WasteDataFlow.
Comments on proposed target:	None at present. Awaiting review of national targets.

BVPI number:	BV 84
Comments on BVPI:	LARAC supports the proposal to amend this indicator to show percentage change in order to aid measurement of waste minimisation.
Comments on proposed definition:	None
Comments on proposed target:	None at present

BVPI number:	BV 91
Comments on BVPI:	<p>LARAC agrees that number of households should be used instead of population in line with the requirements of the HWRA 2003.</p> <p>LARAC is not certain on the need to break down the indicator into numbers/types of materials. Authorities that collect co-mingled materials for recycling will not be able to provide accurate or consistent data in this respect.</p> <p>Consideration should be given to having a single reported figure of % of households with kerbside collection of at least two materials, following the definitions set in the HWRA 2003 instead of breaking</p>



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	down this indicator into material types.
Comments on proposed definition:	<p>LARAC supports the definition of using households instead of population.</p> <p>The provision of recycling banks to blocks of flats/houses in multiple occupation needs to be clarified in the HWRA 2003 guidelines and therefore until that consultation is completed it is impracticable to set a definition for this BVPI at this point.</p> <p>The inclusion of household green waste for composting “even if there is a charge” conflicts with the HWRA 2003 consultation document that states this type of waste is specifically excluded. Therefore, if the aim of this BVPI is to monitor compliance with the HWRA 2003 then this definition needs amending (or the HWRA 2003 guidelines need amending).</p> <p>Also, the HWRA 2003 consultation states that paper and card are counted as two streams, whereas the proposed BVPI 91 definition states that paper and card would be just one category – again this is in conflict within this BVPI definition.</p>
Comments on proposed target:	None at present.

Other comments from member survey:

6 members stated that they are in favour of home composting being recognised within the BVPIs, be it as a new indicator or encompassed within the existing sets.

BVPI 199 – comment received that the methodology for this indicator needs to be rewritten as it is far too onerous and needs to be simplified.

New BVPI X21 – comment that this is a waste of time and would be better to use average time to remove any vehicle.

Carole Taylor

For LARAC Policy team