



Local Authority Recycling Advisory Committee

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Local Government Association
Local Government House
Smith Square
London
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Dear Alice

Local Government – Naturally resourceful
Leading the way to better use of material resources

Thank you for the opportunity to respond to above LGA consultation paper. 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 380 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.

LARAC supports the reports aim of establishing a clear vision for the role local authorities can play in improving use of material resources.

LARAC has the following comments:

What does Central Government need to do?

LARAC feels that central government should produce statutory guidance on new legislation well in advance of implementation so that all agencies can plan properly for smooth implementation.

LARAC agrees central government needs to recognise that statutory targets inevitably take priority in local government, even though there are many other important areas of work. LARAC would like to move away from targets imposed by Government to the development of a more consensual style of decision making about strategies and targets that takes into account local conditions and opportunities but does not include the threats of penalties unless individual local authorities fail to develop and implement effective strategies.

LARAC feels that Central Government should also take a holistic view of resource management when it implements legislation. For example the Animal By-Product Regulations could have been used to facilitate the implementation of the separate collection of food waste from all premises, meeting food safety and landfill directive needs at the same time.

In relation to the different sections of the consultation:



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Local & National Government's role in waste awareness/cultural change (Section 1 & Section 3)

This area of activity needs a commitment from central government for long term and generous funding. At the moment the Government is actively militating against local authorities resourcing waste promotion under its current "efficiency" agenda that considers resources put into promotions as working against improving efficiency.

Public procurement (Section 2)

There is an acute need for leadership from all Government departments as well as local authorities. We wish to promote better joined up thinking between waste management, environmental strategy, planning and procurement in LAs.

Public sector generally lobbying in Europe (Section 3)

We are aware that the private sector lobbies effectively in Brussels and elsewhere in the EU where its interests are affected by possible and forthcoming legislation. We would like central and local government to work more closely together in helping formulate waste policy upstream.

Trade waste (1 - shops, traders & offices)

There is an urgent need to clarify what local government's role should be in relation to LATS, taking into account European practice and the definition of municipal waste. Government's policy must become more joined up between (current) municipal waste and commercial waste. The issue needs a fundamental review.

Industry waste (2 - Industry)

LARAC approves of NISP and would like to promote it in collaboration with Economic Development teams in our authorities. Working with waste management professionals in local authorities we will strive to develop the vision and the understanding of waste management as resource management. Economic development teams may often have the funds and Development "big picture" in the local area. The two streams of experience and knowledge should be combined wherever possible.

Farming (3)

Many LAs are already working with farmers on compost. It might be possible in conjunction with other agencies (such as the Environment Agency) to develop local advisory services. This has links with Industry waste (2 above) and will have resource implications.



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Construction & Demolition Waste (4)

LARAC agrees with the consultation document in principle and would like waste management professionals to work more closely with highways engineers (6) and construction contract specifiers, who are sometimes understandably conservative when specifying material. Could we help with dissemination of best practice and trials with secondary materials?

Buying recycled (5)

This is covered elsewhere. LARAC has always been in the forefront in promoting "Buy Recycled". We look forward to continuing to work for greater use and acceptance of secondary raw materials.

Materials resources (8)

LARAC basically agrees with LGA on this point. This introduces some of the same themes as dealt with above. It needs local & central government to work more closely together with local government.

Links to municipal waste management.

We strongly support the thrust of the consultation document.

Case studies

LARAC will encourage its members to contribute to and submit case studies on construction and demolition waste, farming, mining & quarrying, and Material Resource Strategies

I hope these comments are useful

Yours sincerely

Mark Allen
Policy Team