

12 January 2004

Stephen Batey  
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Dear Stephen,

**SUBJECT:ODPM REVIEW OF GOVERNMENTAL  
RESPONSIBILITIES FOR WASTE POLICY**

Thank you for the opportunity to comment on the *Government* review of waste policy functions. Apologies that the response was not as forthcoming as I would have liked. The comments below come on behalf of the Local Authority Recycling Advisory Committee (LARAC) for whom I am Chair. LARAC is an association of 450 local authority professionals who co-ordinate and operate waste management services for their respective authorities. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary Authorities. Membership is also drawn from authorities with England, Scotland, Wales and Northern Ireland. As best we can, these comments are confined to the operation within the English legislative system.

Questions which the Review is considering responses from a Local Authority Perspective:

- (i) Are there clear lines of responsibility and accountability within Government for the development and implementation of waste policy?

No, not really. There appears to be a plethora of contradictory priorities, methodologies and perspectives which are prevalent. The interface (between the varying approaches) where the detail is subject discussion are unsatisfactory and lead to compromise / prevarication and prevents

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investment / decision making.

- (ii) How well do the current responsibilities fit with the wider policy objectives of the departments concerned? What can we do within the current framework to improve this?

It would appear that the current responsibilities in relation to waste are derived from the individual department's wider responsibilities therefore from this perspective the fit could be seen as excellent. However much waste Policy as in the early days of Health and Safety legislation is in direct contradiction to existing custom practice / vested interests within specific policy areas. As with Health and Safety ownership is the key to success therefore I would suggest that the current model should not be dismissed but significantly enhanced.

- (iii) How might Whitehall organise itself to interact more effectively with those outside government?

Whitehall like all organisations chase resources therefore rather than resources being given to specific Departments for individual policy objectives cross cutting Policy teams with accountable senior staff and appropriate resources should be established. The teams should be strategic and consultative only and be responsible for allocating resource and measuring performance. The teams should have very tight remits and their life and objectives be determined by a single overarching strategic waste team which is not time bound and is accountable for the implementation of all new policy and overall leadership.

Each specific Policy team should have a public interface and manage all external contacts. When designing a new building it is essential to talk to the Architect not the labourer.

- (iv) Do stakeholders/customers outside Whitehall have a clear point of contact?

As above clear points of contacts exist for individual departments but as for the implementation detail, which is crucial, the attitudes are definitely based on a Silo culture.

- (v) Do current structures help or hinder the process of negotiating and implementing European legislation?

Current Structures should be enhanced using the wealth of knowledge that each individual area of expertise can bring to a specific piece of legislation a sense of common purpose and responsibility is needed and is currently noticeably lacking.

- (vi) What organisational lessons can be learnt from past experiences to improve the process in the future?

Health and Safety considerations are now pervasive in all organisational decisions waste similarly effects organisations but from a resource perspective rather than a human perspective. The scale of benefits derived from the implementation of Health and Safety legislation is significant but started with very prescriptive hands on management policies and legislation with strong political leadership before moving to the more self regulating risk based approach of the late 20<sup>th</sup> Century.

Waste needs the same strong leadership approach to obtain momentum before Local Authorities and the private sector will become self-improving.

Thank you for the opportunity to comment.\ In addition to the specific comments above I would also like to convey that LARAC has consistently stated the need for increased forward planning and policy development capacity within Government (and allied resources within the Environment Agency). Whilst it may not be a specific part of your review, it is self evident (at least to those in local government) that an increase in resources would be a significant contributor to improvement of the long sought for joined up agenda for waste in England.

I hope you find these comments helpful.  
Yours Sincerely,

Andy Doran  
Chair, LARAC