



Advisory Committee

CPA Team  
Audit Commission  
1 Vincent Square  
London  
SW1P 2PN

Dear Sirs,

**SUBJECT: DELIVERING CPA - ENVIRONMENTAL SERVICES  
CONSULTATION PAPER**

Thank you for the opportunity to comment on the latest proposals for assessing environmental services within the Comprehensive Performance Assessment process. The comments below come on behalf of the Local Authority Recycling Advisory Committee (LARAC) for whom I am Policy Officer. LARAC is an association of 300+ 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. For that reason our comments are constrained to the proposals as they affect assessment of waste management functions.

It is generally welcomed that the proposed assessment of waste management as a component (sub block) of environmental services will now be a more transparent process with the scores for the individual components divulged to individual authorities. This is particularly important with regards to waste management, as there are so few existing Best Value reviews. Given that individual authorities will have access to their ratings for the waste management sub block, this will allow waste professionals the ability to obtain feedback on the perceived quality of their service in advance of any more detailed Best Value review.

With regard to the detail of the proposals LARAC feels that there will remain some difficulty with employing some of the performance indicators proposed. As a general point use of the BVPI 84 (Kg of household waste collected per head) will remain contentious. Generation of waste at a household level is something that all authorities are seeking to influence in a positive way, however, there are so many other contributing factors to the level of household waste that the effect of a local authority upon this can be difficult to determine. Put simply it is more likely that national or local economic factors plus the actions of industry in

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product design and fashion are more likely to affect the level of household waste generation than the actions of individual local authorities. For that reason we would caution against the inclusion of this indicator within the assessment framework. Similarly with regard to the subjective assessment of 'how good a service is' growth of household waste above the national level is a very crude indicator of the success of a statutory waste collection or disposal service. There are several authorities within the United Kingdom who have invested considerable time and money in high profile waste awareness, minimisation and recycling campaigns that still face waste generation increases above the national level. Again as we believe that these are more due to societal and economic influences rather than action (or lack thereof) on the part of the local authority, we would urge that this measurement is discarded.

Thank you for the opportunity to comment and I would like to stress that whilst LARAC and local authorities in general are committed to working to reducing the levels of household waste within their areas, we do not as yet feel that this crude measurement of tonnage per head can be used as true assessment of the success or otherwise of their activities.

Yours Sincerely,

Andy Doran  
Policy Officer, LARAC  
Surrey County Council