

EVIDENCE TO THE HOUSE OF COMMONS ENVIRONMENT, TRANSPORT
AND REGIONAL AFFAIRS SELECT COMMITTEE

DELIVERING SUSTAINABLE WASTE MANAGEMENT

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My name is Andy Doran. I am the Waste Policy Officer with Surrey County Council responsible for waste strategy issues. I have been asked to submit evidence on behalf of the Local Authority Recycling Advisory Committee (LARAC) for whom I collate members views on waste strategy and policy. LARAC seeks to represent the views of its 300 plus members on issues of concern in local authority waste management. Current membership is drawn from Unitary, Metropolitan, Waste Collection and Waste Disposal Authorities. These views are those of the LARAC membership, not those of my authority.

1. In view of the range and type of statutory waste management services provided by local authority professionals the views of LARAC will be constrained to these main areas as addressed by the scope of the Committee's inquiry.
2. As a starting point LARAC is surprised to be invited to give evidence to the Committee so soon after the publication of the Government's Waste Strategy 2000. With this in mind these comments are based upon the current understanding of Waste Strategy 2000 and the policy direction adopted prior to that in 'A Way With Waste'.
3. Government's overall policy direction remains confused supported as it is by the waste hierarchy that encompasses a broad band of recovery options. The adoption of formal policy backing for energy from waste recovery as a legitimate part of an integrated waste management system within A Way With Waste followed by an apparent distancing from the policy in the finalised strategy is also unhelpful for local authority professionals trying to steer development in sustainable direction.
4. There has been a lack of clarity and consistency in the approach of Government to waste with the key concepts of sustainability and Best Practicable Environmental Option as particular examples. The work of the Environment Agency in developing the WISARD software tool will undoubtedly help and pay dividends in the longer term when the tool is more widely used and understood. However, the WISARD tool provides only part of the answer and waste professionals urgently need further guidance on the processes required to assess economic and social factors that contribute to the BPEO for a particular wastestream. In addition to this further guidance is needed on a robust and transparent decision-making framework that will allow local authority waste professionals to reach decisions on a future strategy for their authority.

5. Unrealistic expectations are being made of the planning which has a pivotal role in delivering sustainable waste management. In particular PPG10, Government Guidance on Waste Disposal and Management, para 47 states:

'In drawing up policies and proposals for their development plans, WPAs should appraise the policy options in terms of the sound environmental and economic effects in order to demonstrate (a) that all the options have been assessed; and (b) that those selected represent the best balance of social, environmental and economic costs and benefits after full consideration of all resources, the BPEO and the principles of sustainable development'.

6. This places wholly unrealistic requirements on planning authorities that are strictly unable to assess matters not related to land-use, even if they were capable of objective assessment. In light of comments in para 4 above this is very unlikely.
7. The provision and management of reliable waste data still plagues the industry despite Government assurances to rectify the matter. Data from the Environment Agency Waste Producers Survey 1998 has still yet to be fully released. This could provide invaluable input to local authority Waste Local Plans as well as providing local information on packaging waste flows. Local packaging data could help in building bridges between local authorities and small and medium-sized enterprises obligated under the producer responsibility mechanism.
8. The Producer Responsibility Obligations (Packaging Waste) Regulations 1997 have had little positive effect on local authorities since their introduction. A recent survey of LARAC members as part of a response to the Department for Environment, Transport and the Regions revealed that only 4% of LARAC members considered that they had benefited (in terms of secure and stable markets) from the introduction of the Regulations. A similar 4% thought that their local recycled materials markets had been adversely affected by the Regulations. Of options discussed by members 63% would support recycling targets drawn wholly from the household wastestream for obligated companies and 88% would support individual obligated company(or compliance scheme) public reporting of the amounts of packaging waste recovered from the household wastestream, subject to commercial confidentiality. LARAC would urge the Committee to consider these recommendations which will also be made through the current consultation process.
9. The challenge of uncoupling increased waste generation from increased economic growth has only recently begun. Government's Waste Strategy 2000 offers considerable support for the principles of waste minimisation, but little by way of direct support. That said, the piloting of householder incentive schemes is welcomed though long overdue. In an effort to raise the public profile and understanding of waste issues several notable authorities including LARAC have come together to support the National Waste Awareness Initiative(NWAI). The Initiative is supported by Government in Waste Strategy 2000, but has yet to receive any meaningful funding from Government.

10. As the primary component of the waste hierarchy waste awareness and waste minimisation need the wholehearted support of Government to educate and inform the public of the consequences of their actions and the opportunities to change that behaviour. Government is ideally placed to support the development of an initiative such as the NWAJ in a similar fashion to their broad environmental campaign 'Are you doing your bit?' LARAC, as do all members of the NWAJ Board, strongly believe that only by gaining a wider understanding of waste issue will the public be able engage and support the change programmes that are needed to steer waste management in a more sustainable direction. Reference has been made elsewhere for the need to put waste on the same level as 'Clunk-Click' or Drink Driving campaigns. Therefore, LARAC strongly urges the Committee to recommend Government financial involvement in a nation-wide campaign such as the NWAJ.
11. The size and extent of new funding to implement the Waste Strategy 2000 is still unclear. Assurances in the Strategy that funding implications arising from the Strategy would be considered in the Comprehensive Spending Review were met with concerns from members. These concerns whilst premature have been borne out in part by the subsequent financial announcements from Government. Whilst the size and nature of the proposed spending allocations is still unclear, it is a fact that local authority environmental and waste management services have been consistently imposed upon over the last ten years or more.
12. Considerable new environmental regulation has been introduced over this period without concomitant new funding. Local authority resources in waste management and to a lesser extent environmental management are at breaking point due to this accumulated burden. An additional complicating factor is that by and large local authorities are unable to ring-fence any new resources allocated through the Statutory Spending Assessment. It is not realistic of Government to prepare and issue a national Waste Strategy without conducting a thorough financial assessment of the proposals and allocate funding to deliver it. In the highly pressured financial environments that local authorities have become Strategies will not survive without such accompanying funding as alternative pressures can always take precedence.
13. Along with the issue of funding there are elements of timing and structure that remain of concern to LARAC. Principally, the introduction of a new recycling target by 2003 and the inclusion of performance targets for recycling within the best value regime. These in themselves are not bad things, but in some areas of the country hinge upon the development of Joint Municipal Waste Management Strategies. Consultation on the scope and content of such strategies is long overdue and must surely impair some authority's abilities to meet the new targets. A similar consultation on the proposed mechanism to implement tradable permits as part of the UK arrangements to comply with the EU Landfill Directive is overdue.
14. When consultations do arrive it is with that added pressure of time, which could be best, avoided. LARAC along with other representative bodies and all individual authorities would like to be consulted on issues in due time and as partners contributing towards policy development. LARAC feels that much of the professional expertise of its membership could be better harnessed by more timely and better constructed consultation processes. If all the Government's words are to be believed then they would like to see local

government as a partner in delivering sustainable waste management. The evidence from our membership is that there is an uneven partnership in the way that Government currently treats local authorities. LARAC would welcome the Committee's support in rectify this.

15. The issue of market development and public procurement has been at the fore front of LARAC's views for many years, however, despite mention in the White Paper 'Making Waste Work' in 1995 and subsequently the topic has failed to receive funding and investment throughout that period. The establishment of the Waste and Resources Action Programme (WRAP) as part of Strategy 2000 is welcomed, but is almost too little too late. The programme appears (from press statements to date) to be heavily underfunded if it is to achieve the step change in market conditions that is required to meet the new mandatory performance and recycling targets within the Strategy. Support for regional programmes could be considered perhaps co-ordinated by the Regional Development Agencies who are able to catalyse activity from the local economy and waste sector. Such an approach combined with the propose WRAP scheme may go some way to allocating the appropriate level of resources needed in this crucial area of waste policy
16. Government procurement of recycled contents is patchy and initiatives within the Strategy are welcomed. However, the issue of public procurement affects all local government and associated organisations. As such it should be tackled in a similarly comprehensive fashion. Establishing a pilot as proposed in Waste Strategy 2000 is a retrograde step when the factors associated with the use of recycled paper for example are well understood. To assist the WRAP programme and set the tone for market development Government needs decisive leadership in its own procurement. This is not the case of the current proposals in Waste Strategy 2000.
17. The Landfill Tax Credits Scheme is now showing signs of supporting the waste policy aims of local authorities some 4 years after its introduction. Recent changes proposed in Waste Strategy 2000 (and still subject to consultation) look likely to focus the funding available toward the research and development of sustainable waste management practices. Initial experiences have suggested to local authorities that funding will flow to schemes which enhance the public opinion of particular waste management operators, a wholly understandable situation in the highly sensitised environment within which waste management operates. However, amendments have been long overdue to ensure that funding is channelled appropriately. LARAC is optimistic about the possible creative partnerships that could emerge with the Community Sector and will play an active role to make these work.
18. As a mechanism to lever change in waste disposal practices the Landfill Tax is still only partly effective. Higher levels of the tax are needed if the cost of landfill disposal and alternative treatments (including the infrastructure and 'public acceptance' costs) are to be deployed more widely. That said local authorities have been at the blunt end of the Landfill Tax by being charged with dealing with large volumes of waste by their metropolitan, unitary or county regions and yet receiving an unequal amount in return via reductions in National Insurance rates. Any proposed changes to the level of the tax should bear this in mind.

19. In summary it is disappointing to note the lack of progress in waste management since the time of the Committee's last inquiry. Waste management decision-making is still based on held beliefs rather than scientific or evidence-based approaches. The planning system is under yet greater pressure to deal with the land-use consequences of more sustainable waste management and public understanding, market development and public procurement are still in their infancy. The policy direction is generally sound although there are some fundamental gaps as detailed by this evidence. Within the waste industry and local government in particular there is an understanding and will to take on the challenges that delivering sustainable waste management presents. However, all too often this can be stifled by inertia brought about by an incongruous and inconsistent policy framework established by Waste Strategy 2000 and associated documents.