



Department
for Environment
Food & Rural Affairs

www.gov.uk/defra

Waste prevention programme for England

Summary of responses and government response

December 2013

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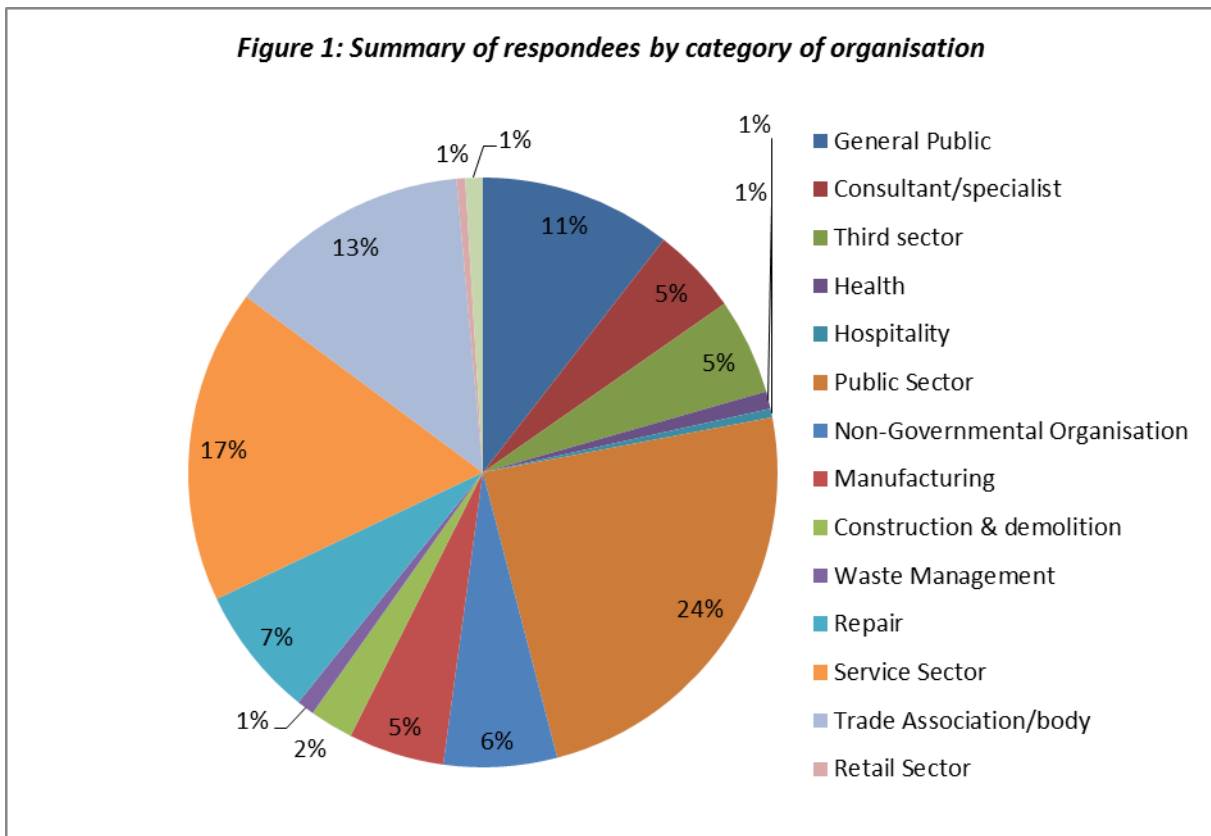
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Introduction

The purpose of this document is to summarise the responses to the consultation on the Waste Prevention Programme for England and to demonstrate how these views have been taken into consideration during the development of the programme.

The consultation opened on the 6th August 2013 and set out the proposed vision, priorities, metrics and roles for Government, Business, Local Authorities and Other Organisations and Individuals within the Programme. It was open for 7 weeks (closing on 23rd September 2013) and responses were encouraged from all sectors.

There were 210 responses to the consultation. The high number of responses was encouraging, as was the range of stakeholder groups who responded. A breakdown of respondents by category of organisation is shown in figure 1.



The greatest proportion of responses came from the public sector (50), the majority of which were from local authorities. This was closely followed by the service sector (36) which consisted of a variety of businesses and trading groups. 29 responses came from trade associations and 22 were from members of the general public. The remaining responses came from the repair industry (15), non-government organisations (14), the manufacturing industry (11), consultants (10), the third sector (10), construction and demolition (5), waste management companies (2), education (2), health (2), hospitality (1) and retail (1).

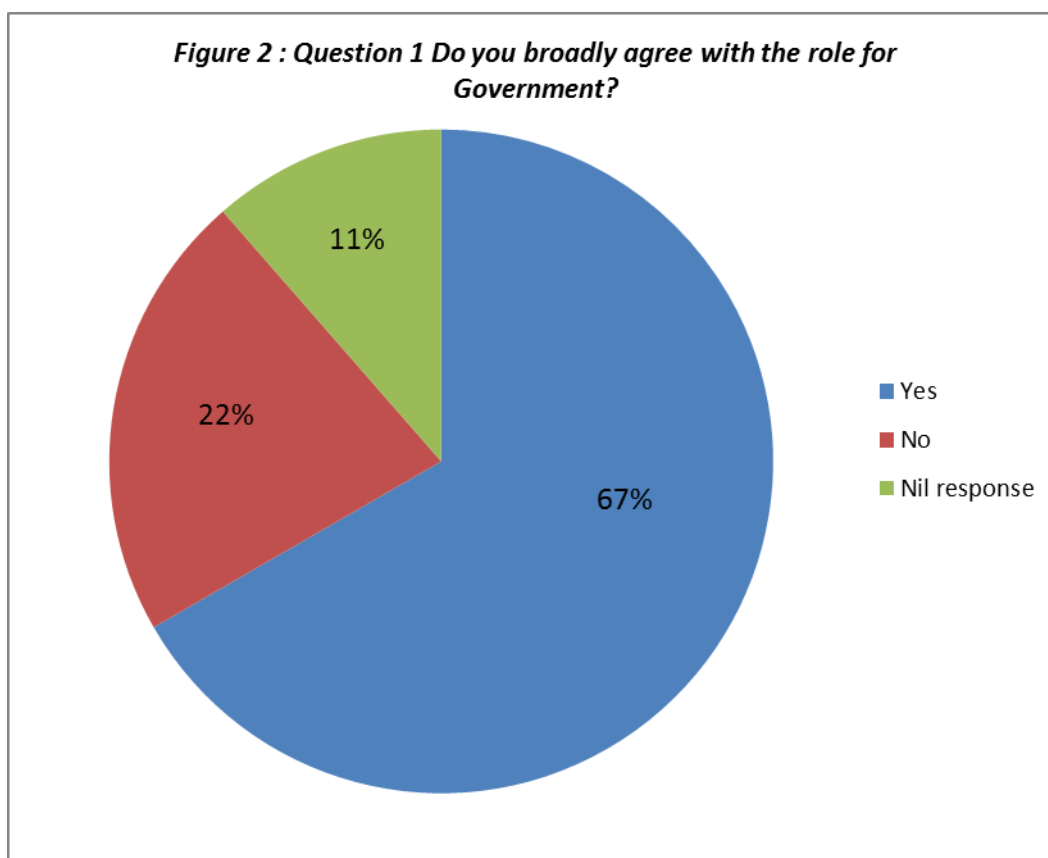
Summary of responses to individual questions

This section contains a summary of responses to each of the four questions contained in the consultation, along with a government response on how these views have been considered in the development of the waste prevention programme.

Question 1 Do you broadly agree with the proposed role for Government?

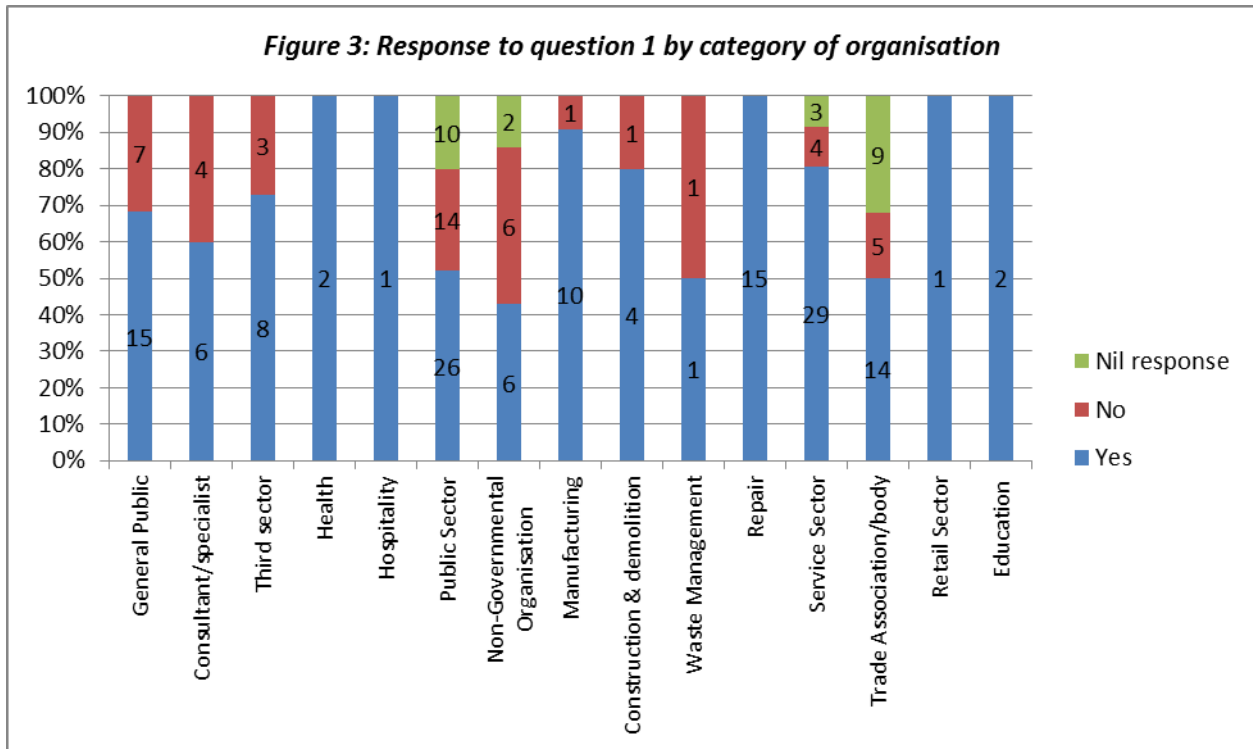
Summary of responses

A total of 186 respondents answered this question. As shown in figure 2, 67% (140) of respondents agreed with the role outlined for government and 22% (46) disagreed.¹



¹ These percentages are calculated on the basis of the total number of respondents (210). If calculated only on the basis of those that provided a definitive response to the question, the figures are 75% agree and 25% disagree.

Further analysis of responses by category of organisation show differing views within the public sector, non-government organisations and waste management companies (see figure 3) where approximately 50% of responses from each of these sectors agreed with the proposed role and the remaining 50% either disagreed or did not respond to the question.



In total, 54 respondents stated they would like a stronger leadership role from government. Actions for government suggested by respondents across all types of organisations included setting targets (24), providing the regulatory and legislative tools for others to use to drive change (41), introducing fiscal interventions, such as incineration tax and VAT exemptions, to incentivise moving waste up the hierarchy (35), educating consumers and others, particularly on the opportunities for repair (21), extending producer responsibility to more products and revising the scheme to incentivise reuse and repair (16), communicating messages on preventing waste nationally (13), devising reporting mechanisms for performance monitoring across the whole supply chain (6) and facilitating sharing of best practice (6).

A small number of respondents (6) strongly disagreed with reducing the role of government but caveated their view by noting that this is a new policy area and time will determine whether or not this will be the correct approach.

A further 24 respondents raised concerns regarding the reduction in funding for the Waste and Resources Action Programme (WRAP) given that WRAP is the key delivery body for waste prevention activities. The work that WRAP has delivered to date on waste prevention was praised by respondents across all sectors.

Some respondents (31) wished to know more details on actions and metrics for inclusion in the waste prevention programme as well as more information on the benefits of waste prevention for individuals and organisations.

Government response

Through the publication of the Waste Prevention Programme for England, government is showing leadership in the move towards a more sustainable, circular economy. Government believes it should focus its action on the essentials that only Government can and must do to support people and businesses in managing waste. Government wants to see businesses leading the way on waste and deliver growth while improving the environment. There is a requirement on Member States to review of the Waste Prevention Programme every 6 years at which point government will consider if further intervention is required going forward.

In response to comments received as part of this consultation, government has set out the actions it is taking to demonstrate leadership in this area within the Waste Prevention Programme. This includes setting clear objectives for waste prevention as well as highlighting what government is doing to reduce its own waste, for example through the Greening Government Commitments, including waste prevention and reuse when the Government Buying Standards are updated and piloting a government-wide “swap shop”.

The leadership role for government also includes setting a clear direction for waste prevention across the economy, for example through the introduction of a charge on single use plastic carrier bags, using the revised Waste Electronic and Electrical Equipment (WEEE) regulations to support reuse and continuing to explore how Individual Producer Responsibility can be introduced. Government will also work closely with the Environment Agency and others to drive waste up the hierarchy which is already enshrined in law. Defra will also work with them to ensure a consistent regulatory approach to the application of the Definition of Waste, specifically in relation to reuse and repair activities.

Government has not included a waste prevention target in the programme as there is first a need to develop indicators with reliable and robust methodologies to measure progress. Imposing new targets, without a full understanding of their impact, could weaken efforts to restore economic growth and undermine the voluntary actions of industry. The European Commission is undertaking work to consider whether a target on waste prevention should be applied at an EU level and is expected to publish any such proposals in Spring 2014. Government will work closely with the Commission, and other Member States, to ensure that there is a robust analysis of the costs and benefits as part of any consideration of targets for waste prevention.

Government recognises that it is not easy to measure waste prevention and will work with representatives of business, local authorities and civil society groups to develop a set of metrics which they can use to measure progress. Work has been undertaken to understand the range of existing metrics which relate to waste prevention across all

sectors, including those provided by stakeholders as part of the call for evidence. This will be used as a basis for those discussions.

Government also recognises that it can play a role in supporting the sharing of best practice, for example through the Reuse Forum, and by facilitating discussions between local authorities, waste management companies and civil society groups to develop partnerships which deliver real improvements in services to businesses and householders.

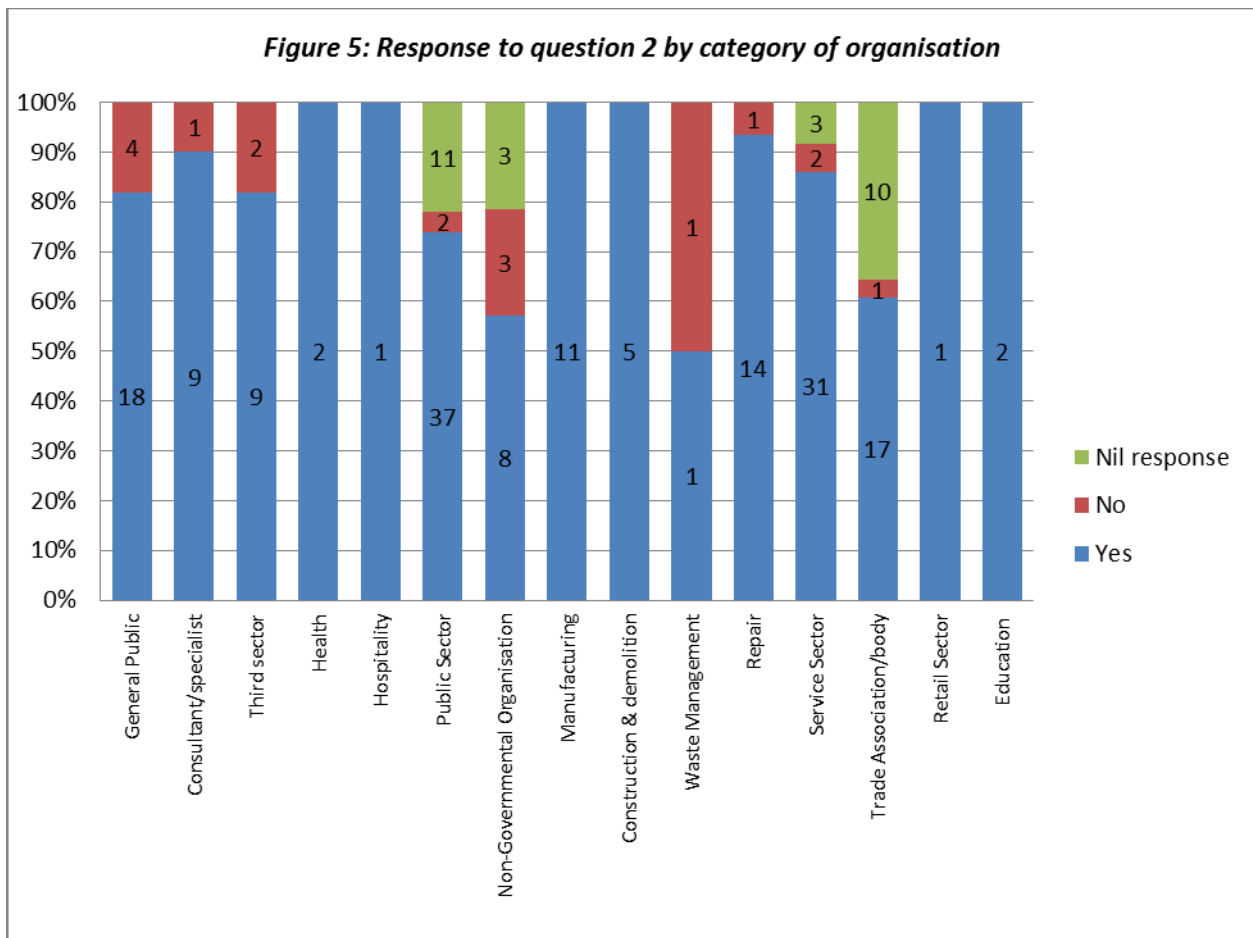
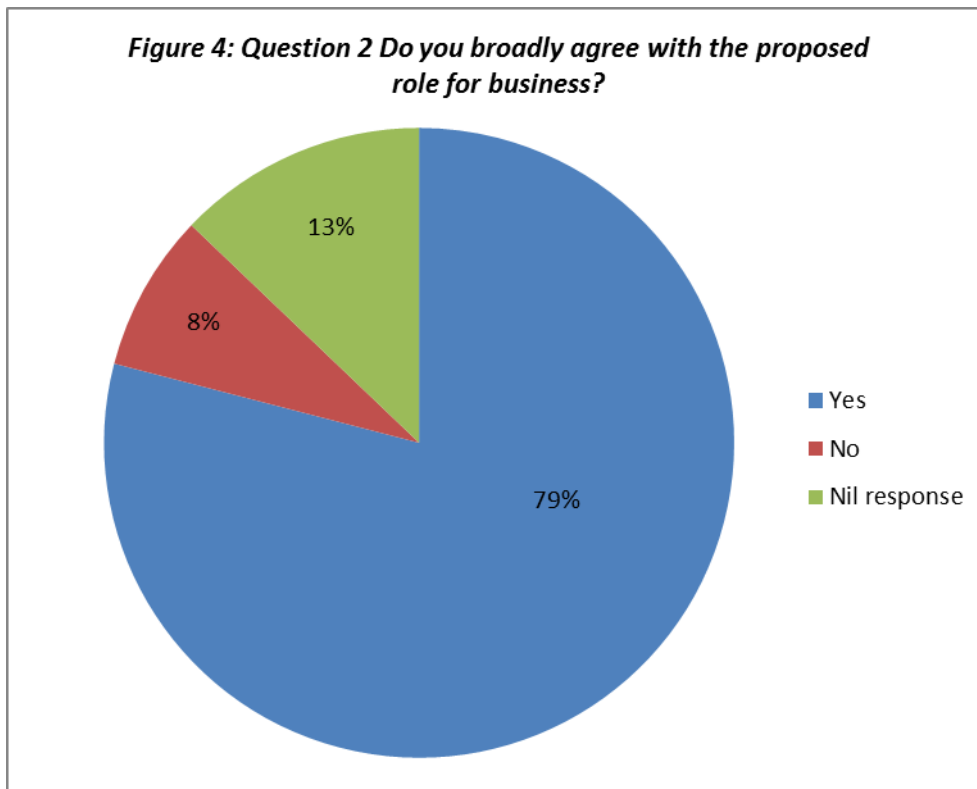
WRAP remains the key delivery body for a large number of actions in the programme, supporting business, local authorities and civil society to undertake waste prevention, reuse and repair activities. Although Defra funding of WRAP is reducing, WRAP's work will focus on key priorities including supporting the efficient use of materials, helping to deliver real money savings and reducing waste. This includes continuing to support reduction in food waste as well as taking forward work to encourage use of innovative resource efficient business models and updating tools to help businesses and local authorities maximise the opportunities from waste prevention and resource efficiency. Government's role in this area will reduce as businesses increasingly realise the economic and commercial opportunities that arise from resource efficiency and tackling environmental challenges.

Question 2 Do you broadly agree with the proposed role for business?

Summary of responses

There were 183 answers to this question. As shown in figure 4, 79% (166) of respondents agreed with the role outlined for business and 8% (17) disagreed.² Unanimous agreement came from the health, hospitality, manufacturing, construction and demolition, retail and education sectors (see figure 5).

² These percentages are calculated on the basis of the total number of respondents (210). If calculated only on the basis of those that provided a definitive response to the question, the figures are 91% agree and 9% disagree.



Many respondents did not provide detailed comments on the business role suggested in the consultation. There was specific acknowledgement from 7 respondents that businesses have an important part to play in preventing waste in their role as producers of

consumables and through their own practices. When developing actions for businesses, 4 respondents suggested a clear plan for the different types and roles of businesses (across the supply chain) was needed. A further 3 respondents wanted recognition that smaller businesses will need much greater support (provision of information as well as investment for processes and infrastructure) in identifying the business case for action than larger businesses.

The key concern with the proposed role for businesses (cited by 20 respondents) was the inherent tension for businesses between the current well-established business models and the risk, uncertainty and upfront costs of changing to new, more resource efficient approaches. Several suggestions were made on how to address this issue., Some thought that it was government's responsibility to create a more level playing field, providing targeted support to smaller enterprises to enable them to develop and stay competitive. Others felt the main issue to be addressed was the split incentives where the costs of waste prevention are incurred at one point in the supply chain but the benefits are felt elsewhere.

Some respondents did suggest specific government interventions for businesses but there was mixed opinion on what these should be. Some respondents requested a regulatory approach by setting targets (9) and introducing more waste legislation (26) such as banning single-use products, whereas others suggested incentivising businesses to take action (for example through tax breaks) and commending good practice (20). Additional suggestions for action by government for businesses included extending producer responsibility schemes to include additional materials (5) and developing more voluntary agreements where these have previously been successful (2).

There was also a call to address product design in terms of improving product durability, designing products for longer life by enabling ease of repair, and banning cheap single-use items. 11 respondents stated that greater reuse of waste electrical and electronic equipment (WEEE) could be achieved if access to discarded material was improved. 11 respondents considered that changes to packaging (such as standardisation) would identify ways to further reduce packaging waste. There was also a call for reporting on waste prevention performance by all businesses using standard metrics (7), bringing together information on flow of materials across the supply chain. Finally, 8 respondents supported partnership working with other organisations outside their own sector.

A further 2 respondents raised the issue of reduced funding to WRAP in addition to those respondents who raised this same issue in question 1.

Government Response

Government recognises that different types and sizes of businesses have distinctive roles in preventing waste. Actions identified in the Waste Prevention Programme are relevant to all parts of the supply chain and support businesses of all sizes and the interaction between different players will become increasingly important.

Small and Medium sized Enterprises (SMEs) were highlighted in the consultation responses as needing particular help and support and government will be setting up a Business Bank which will improve access to finance under a single organisation. The programme also highlights other actions which SMEs can take, either by themselves or in partnership to realise the savings through managing resources more effectively.

Government supports the move towards a more resource efficient, circular economy and is addressing the challenges of the transition from a traditional linear consumption model by supporting innovation in design, as well as trialling alternative business models as part of the Waste Prevention Programme.

Voluntary collaborative agreements, such as the Courtauld Commitment and the Sustainable Clothing Action Plan, have proven results in reducing waste. Defra will continue to use them to encourage businesses to take collaborative voluntary action to make their products more sustainable. The development of a Sustainable Electricals Action Plan will bring together existing strands of work in this area, as well as creating a forum for further action. Through WRAP, government will seek commitment from the electrical and electronics industry on design for optimum product life and increased technical durability.

Government will continue to support the work of the Technology Strategy Board and Circular Economy Task Force which fund research into design of products, reuse and remanufacturing. Government will also raise awareness of resource efficient business models and supply chain innovations through Action Based Research pilots.

In addition Government will explore how Individual Producer Responsibility (IPR) can be implemented so that businesses can benefit when they design and manufacture products which last longer and be incentivised to design systems which enable them to retain ownership of products.

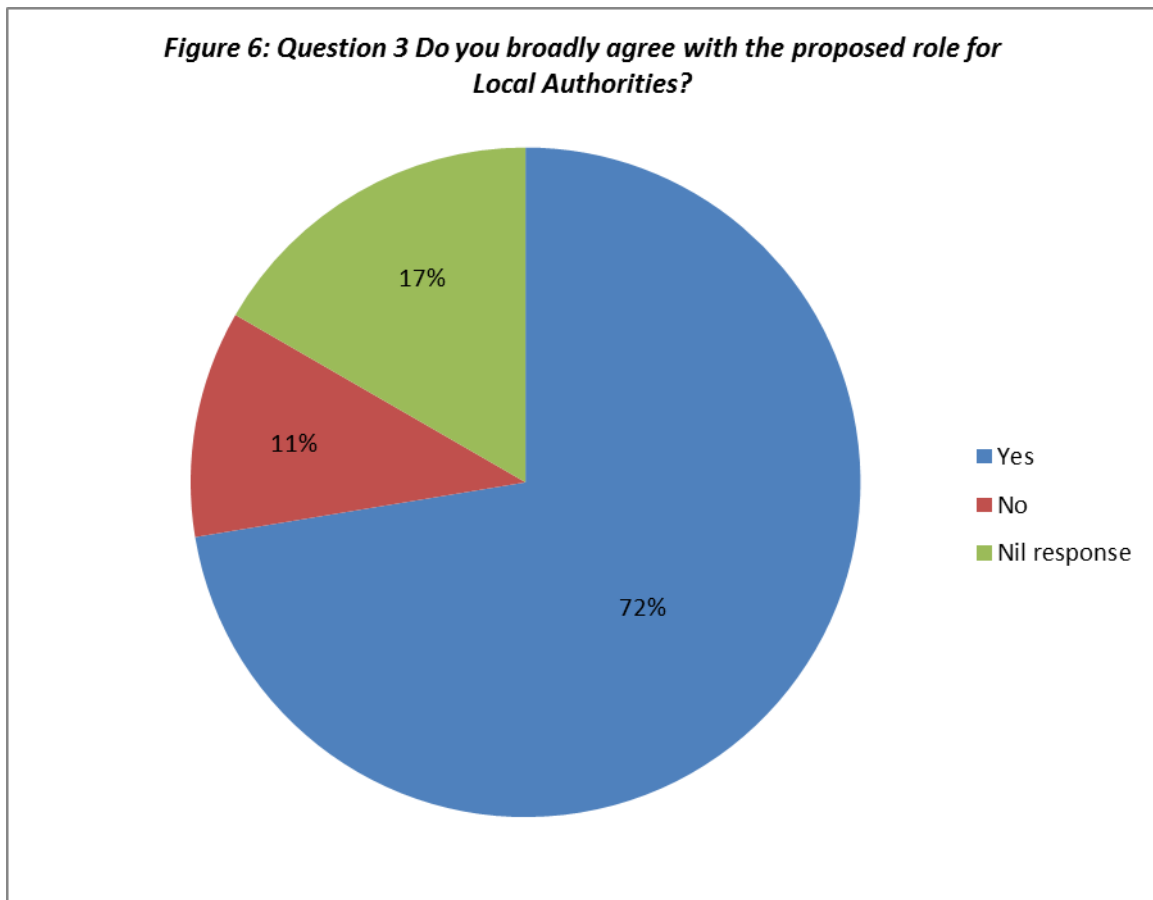
As mentioned in response to question 1, Defra will involve businesses in developing a suite of metrics to measure waste prevention impacts. The development of the electronic duty of care (EDoC) system, which is the voluntary online duty of care waste transfer notes system, will be a major step towards obtaining more robust data on business waste which will also help businesses understand what waste they produce and help monitor progress on waste prevention.

Question 3 Do you broadly agree with the proposed role for Local Authorities?

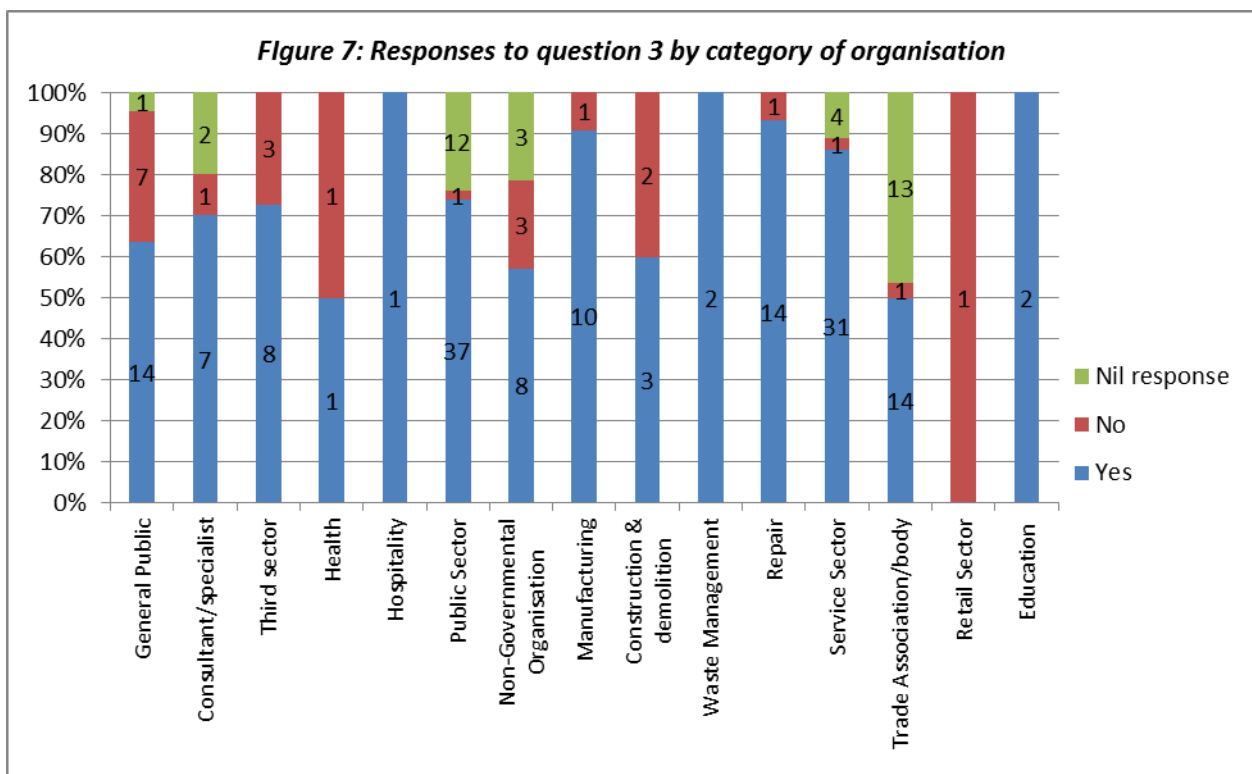
Summary of responses

There were 175 answers to this question. Again there was a high level of agreement from respondents to the proposed role of local authorities with 72% of responses (152) agreeing

and 11% of responses (23) disagreeing with the role of local authorities (see figure 6).³ The positive response to the proposed role was not unanimous across many sectors, with split views occurring within the construction and demolition, health and third sectors as well as by non-governmental organisations and the general public (see figure 7).



³ These percentages are calculated on the basis of the total number of respondents (210). If calculated only on the basis of those that provided a definitive response to the question, the figures are 87% agree and 13% disagree.



Eighteen respondents agreed that local authorities should have their own local waste prevention plans with mixed views as to whether government should or should not advise on their content. The idea of working in partnership to deliver waste prevention initiatives was agreed with by 13 respondents, and 9 respondents supported the idea of local authorities taking the lead in demonstrating best practice through their own activities (particularly procurement). There was a call to make more of the role that local authorities can play in educating consumers to communicate waste prevention messages (7), in particular their ability to work closely with the education sector to influence the younger generation.

The role of local authorities to support local businesses in preventing waste appeared to be more controversial. 7 respondents considered that local authorities can help businesses achieve resource efficiency through education and provision of services, as well as working in partnership with the private sector to influence the amount of waste channelled down the supply chain. A further 7 respondents, however, challenged this role as they believe the limited resources of local authorities should be focused on where they can receive the greatest and most direct benefits (i.e. reducing household waste).

The main concern raised (26) was the need for funding to enable local authorities to take on new responsibilities (particularly in the short-term), given that local authorities are experiencing further budget cuts. In addition to this, there were fears that the future cut to WRAP's budget will impact on the level of support offered to local authorities to deliver this work (identified by 2 respondents).

There was a call for recognition (from 16 respondents) of the role waste collection systems have to play in supporting waste prevention, whilst realising there are various operational

barriers in place (such as waste disposal contracts and the drive to achieve 50% recycling rate) which disincentivise local authorities to address waste prevention.

Government response

Building on responses to the consultation, government has increased the scope of the local authority element of the Waste Prevention Programme to encompass the wider public sector. For example, we have taken on board the importance of education and have included an action to work with others to disseminate messages on waste prevention, such as through schools and higher education, recognising the important role they have to play in communicating these messages. Defra will also help the wider public sector to reduce their own waste, starting with the NHS by exploring the opportunities for savings through waste prevention.

Public funding is under extreme pressure and the Waste Prevention Programme strongly encourages partnership working as a means of making the most of limited budgets. In response to the concerns raised as part of the consultation, Defra has set aside £800,000 to support waste prevention action. The Community Partnership Fund will be managed by WRAP and run for two years supporting partnership projects from local authorities, businesses, schools, and community groups.

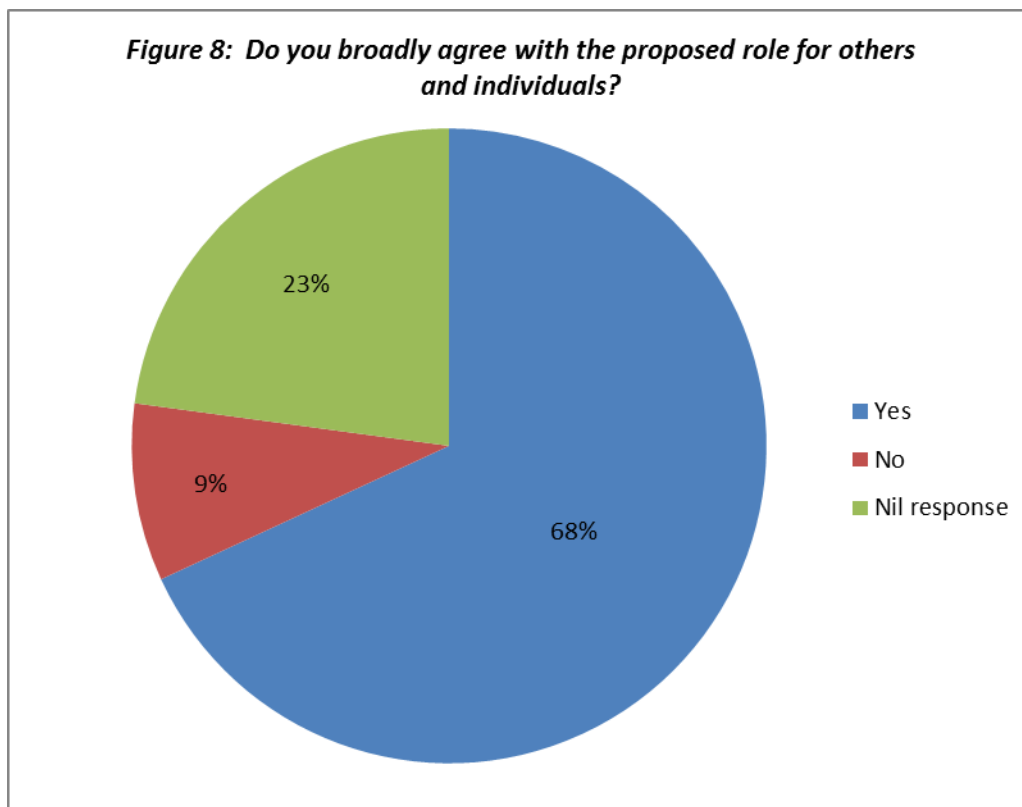
In addition, through government funding, WRAP will continue to support local government and the wider public sector to realise the benefits of resource efficiency and effective waste management. As part of this, government will explore how best to support training of local authority officers to offer advice to local businesses and civil society groups to reduce waste in a cost effective manner.

Evidence from the call for evidence demonstrated a wealth of knowledge and experience from different authorities and organisations across England. Much could be learnt from practices developed elsewhere, which is why Defra intends to set up a forum for local authorities to share best practice. This will complement existing local authority networks and enable discussions on waste services which support prevention and reuse activities.

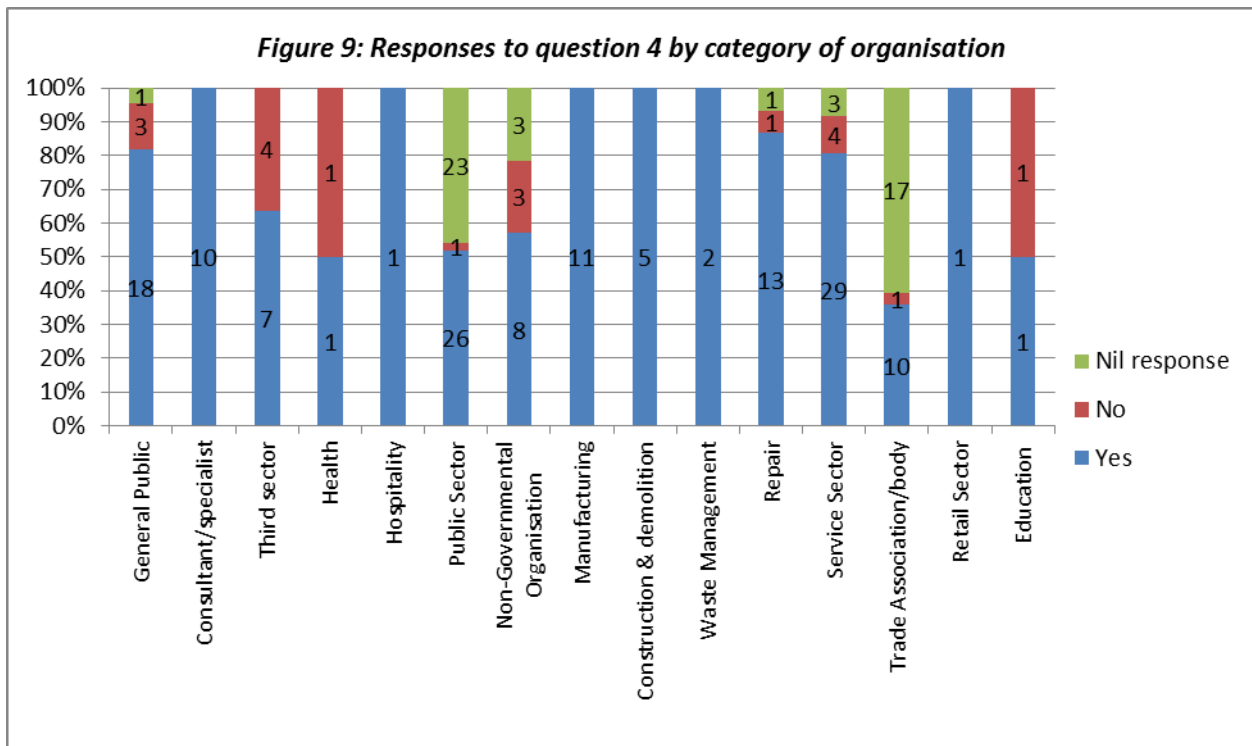
Question 4 Do you broadly agree with the proposed role for Others and Individuals?

Summary of responses

There were 162 answers to this question. 68% of respondents (143) agreed and 9% (19) disagreed with the role outlined in this question (see figure 8).⁴ The positive response to the proposed role was not unanimous across all sectors, with a noticeable split of opinion from the third, health and education sectors (see figure 9). A significant proportion of the public sector and trade association respondents did not respond to this question.



⁴ These percentages are calculated on the basis of the total number of respondents (210). If calculated only on the basis of those that provided a definitive response to the question, the figures are 88% agree and 12% disagree.



Overall, respondents recognise the role for others and individuals to play in preventing waste, but felt the role required support from government (21) as well as businesses (4) and local authorities (5) to enable a cultural shift. Additional roles identified by respondents for others and individuals included encouragement to grow your own food (to minimise packaging), attend swap shops, buy local produce and support food redistribution across the grocery sector.

In terms of government support for others and individuals, 9 respondents suggested providing more funding (using income from landfill tax) to enable development of new business models and introducing fines for landfilling reusable and recyclable material. More legislation was asked for by 2 respondents to increase second-hand use of products (such as manufacturers supplying information on service parts). However 2 other respondents sought the deregulation of parts of environmental health (i.e. food hygiene) and trading standards. Twenty two respondents wanted government to set clear expectations for individuals and industry to adhere to (such as reuse targets) and also to publish data relating to each stage of the waste hierarchy. At an international level, 3 respondents wanted government to seek changes to existing EU Directives which they believe prevent further reuse from taking place, and to exchange good practice across the world.

One respondent recommended using widespread entertainment such as TV soaps to 'normalise' prevention behaviours. Three respondents suggested introducing a labelling system for products suitable for reuse. Three respondents thought more reuse could be achieved by designing products to be second-user friendly and through introducing reuse depots at retailers to prepare material for returning direct to producers.

Sixteen respondents encouraged more partnership working between local authorities and the third sector via contract tenders and provision of space for pop-up reuse and repair

shops. The idea of having reuse and repair centres alongside civic amenity sites was suggested (3), as well as providing concessions to charity shops for managing waste and offering reuse and social value credits.

Government response

Government wants to encourage action to reduce waste and increase the amount of reuse and repair and is addressing barriers to such activities. In addition to actions identified elsewhere in this document, government is continuing to develop the evidence base on the benefits of and barriers to waste prevention. This work is likely to focus on developing a more robust baseline of waste arisings as well as investigating opportunities in specific areas such as repair.

Government is also funding Action Based Research pilots to raise awareness of new business models and supply chain innovations, and is supporting WRAP in running trials of take-back schemes and leasing or hiring services.

On behalf of government WRAP will explore ways to increase consumer confidence in second hand goods in partnership with industry and others as part the Waste Prevention Programme, for example through the introduction of a reuse standard or using another mechanism to deliver the same results. WRAP will also take forward work to develop a national web-based postcode locator to help direct consumers to local reuse and repair services. Building on the work of the Defra reuse forum, we will continue to facilitate discussions between the public sector, reuse organisations and businesses to overcome obstacles to greater levels of reuse.

Defra will continue to work with and influence the European Commission and other Member States to ensure the promotion of resource efficiency whilst minimising burdens. As part of implementing the Ecodesign Directives and EU Ecolabel scheme, Defra will press for waste prevention requirements in product standards when they are updated.

Annex A

List of respondents

360 Environmental Ltd
Amey
AmeyCespa(East) Ltd
Anaerobic Digestion and Biogas Association
Andys Electronics
Autofil Holdings Ltd
Aviation Training International Ltd
Babcock
Barry TV Service
BK-Repairs
BlindSpot Think Tank
Black & Veatch Ltd
Black Mountain Repairs
British Beer & Pub Association
British Ceramic Confederation
British Coatings Federation
British Hospitality Association
British Retail Consortium
British Soft Drinks Association
British Veterinary Association
Brook Lyndhurst
BSK-CiC
Buckinghamshire County Council
Bucks Waste Partnership
Canterbury City Council
Professional Carpet Repair Service Individual
Catering Equipment Suppliers Association
CBG Consultants
Charles Hyde & Son Ltd
Chart Electronics
Chartered Institution of Wastes Management
Chartered Institution of Water and Environmental Management
City of London Law Society
Computer Aid International
Concept Engineering Consultants
Cornwall Partnership NHS Foundation Trust
D & M TV repairs
DA Systems
Dartford Borough Council
Derbyshire County Council
Devon County Council
Dialight Plc

DIEM Ltd
Dolman Audio Visual
Dorset Waste Partnership
Dover District Council
East Staffordshire Borough Council
East View Video Services
Eco-Bat Technologies
ECOLATERAL Ltd.
EDF Energy
EEF Safe
Engineering Employers Federation
Electronic Audio Visual Servicing/Repair
Energy UK
Enfield Council
Engineering Academy
En-Venture
Environment Agency
Environmental Services Association
Environmental Value Solutions
Essex County Council
Excelsior Panelling Systems Ltd
F.J.Rogers
Food and Drink Federation
Food Cycle
Freelance Consumer Electronics Engineer
Furniture Re-use Network
G4S
GD Electronics
Gravesham Borough Council
Greater Manchester Waste Disposal Authority
Green Alliance
Hambleton District Council
Hampshire County Council
Harrogate District Friends of the Earth
Harrow Environmental Forum
Heathrow Airport Limited
Herts With Out Waste ("HertsWOW")
Horn Cutting Tools Ltd
I volunteer with transition town movement and master composters in Gloucestershire
Industry Council for Research on Packaging and the Environment
Independant
Intellect
J.T. Electrics
John Wintrip
Keachie Electronics
Keep Britain Tidy
Kent County Council
Kent Resource Partnership

Kingfisher PLC
LASCO SUPPORT SERVICES LTD
LBRUT
Leeds City Council
Leicestershire Waste Partnership
Liverpool City Council
Local Authority Recycling Advisory Committee
Local Government Association
London Borough of Lambeth
London Borough of Sutton
London Community Resource Network
London Councils
London Reuse
Ludgate Consultancy & Training Ltd
London Underground Ltd
Maidstone Borough Council
Merseyside Recycling & Waste Authority on behalf of Merseyside & Halton Waste partnership
Met office
Mike Read Associates
Mitre Construction Co Ltd
Multi National
NAIL2
Nappy Alliance
Nappy Ever After Ltd
National Bed Federation
National Farmers Union
National Federation of Demolition Contractors
Nimlok Ltd
Norfolk County Council
North London Waste Authority
North Yorkshire County Council
Northamptonshire Waste Partnership
Nottinghamshire County Council
Oxfordshire Waste Partnership
Portal Ltd
Project Integra is Hampshire's Waste Partnership
QSA Partners LLP
ReAlliance
Reaph Ltd
Reepair
Renewable Energy Association
Renishaw Plc
Resike Ltd
Resource Association
Resource Futures
Rosti McKechnie Limited
Rumbletums (Kimberley) Ltd
RDC

Service to consumer electronics
Sevenoaks District Council
Shepway District Council
Shropshire Council
SKM
Sodexo
Somerset Waste Partnership and Gloucestershire Joint Waste Team
South Tyne & Wear Waste Management Partnership, Gateshead Council
Spedan
St Helens TV & Laptop Repair
Stop The Incinerator (L.B. of Sutton)
Straight plc
Supertronics repairs
Surrey County Council
Swale Borough Council
Tata Steel
Television-Magazine-Forum
TesTex NDT Ltd
Textile Recycling Association
Textile Recycling for Aid and International Development
The Acclaimed Software Company
The Consortium for Purchasing and Distribution
The John Lewis Partnership
The Packaging Federation
The Restart Project
Thermoteknix
Timber Trade Federation
Torbay and Southern Devon Health and Care Trust
Transition North Cornwall
Tunbridge Wells Borough Council
TV repair individual
TV repair individual
TV Bargains
Tyre Recovery Association Ltd
UK Environmental Law Association's
United Kingdom Without Incineration Network
Valpak Limited
Veolia
Video Clinic Pontyclun
Vital Energi
Voluntary
Volunteer Master Composter and recycling - Individual
Wandsworth Borough Council
Water UK
West London Waste Authority
Western Riverside Waste Authority
Wheal Jane Ltd
Whitegoods Trade Association

Wiltshire Council
Women's Environmental Network
York & North Yorkshire Waste Partnership
Yorkshire Energy Partnership

To note: details of individuals who responded to this consultation have not been included.