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Department
for Environment
Food & Rural Affairs

Call for Evidence: Waste Prevention Programme for England

Summary of responses and government response

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Introduction

The purpose of this document is to summarise the responses to the Call for Evidence on the Waste Prevention Programme for England. These have been drawn together under the key themes set out in the call. It also sets out how these have been taken into consideration in the development of the Programme.

The Call for Evidence opened on 11 March 2013 and ran for 7 weeks, closing on 29 April 2013. It set out the evidence, priorities, barriers, opportunities and ongoing action, and invited views and information to help inform the Programme.

We received a total of 102 responses to the Call for Evidence. Of the responses received, 33 were from the public sector (28 of which were from local authorities (LAs)), 8 identified themselves as NGOs, 8 as businesses, 4 service sector, 2 light industry/manufacturing, 2 retail sector and 53 as 'other', which was made up of 29 trade and advisory bodies, 7 consultancies, 2 from the construction sector, 2 hospitality sector and, the remainder, a mix of charities, special interest groups, associations and industry.

Overall, respondents provided mostly qualitative evidence with limited quantitative data. Respondents did not always explicitly answer the question asked, rather providing commentary. Consequently for most questions it was not possible to report statistical outcomes or calculate the level of agreement or disagreement. Where possible, we have included quantitative data e.g. the number of respondents who wanted plastics added to the list of priority materials. It was evident that the majority of sectors were keen to see and take some form of action on waste prevention although there was no clear agreement on what that action might look like. One key message was that many respondents viewed recycling and reuse as equivalent to waste prevention.

Priorities

The Call for Evidence proposed priority areas for action to be food waste, textiles, paper and board, furniture and bulky, construction and demolition waste, chemical and healthcare waste and Waste Electronic and Electrical Equipment (WEEE).

The majority of respondents (57%, 58 respondents) agreed with all or most of these priority areas. 27% (37 respondents) did not agree and 7% (7 respondents) did not indicate a preference. Responses received from the textile, healthcare, chemical, food and (in particular) the construction sectors supported the inclusion of their respective waste streams in the Waste Prevention Programme. The construction sector provided additional details on priorities within their sector.

Several additional areas and materials were suggested as being priorities by respondents. The most frequently suggested for prioritisation were plastics (17 respondents), packaging (17 respondents) and nappies (9 respondents). Respondents from the packaging industry expressed concerns over further action targeted at packaging as they felt that the greatest

wins had already been made. Two respondents stated that paper and board should not be included simply because of the scale of its usage which, when having served its purpose can be recycled. Instead, it was suggested that there is a growing need for education on the role of packaging in preventing other types of waste (for example food).

The inclusion of furniture was queried by 2 respondents who felt that well established reuse networks already existed for this waste stream. Similarly the inclusion of textiles and WEEE were questioned by one respondent due to the existing channels for reuse and the relatively small proportion of the waste stream it forms.

Alternative prioritisation criteria were suggested by some respondents, including; the potential value of savings, resource scarcity and the energy demand or intensity of products. Some respondents supported the suggestion of looking across the cross supply chain whilst others asked that intervention be specific for sectors rather than a one size fits all.

Metrics

The difficulties in trying to measure waste prevention were acknowledged by many respondents but they also recognised that evidence is required to demonstrate that waste prevention is occurring. Several respondents felt that there was already waste prevention taking place but it had not been defined as such by those undertaking the action and therefore not recorded.

Nine metrics for the measurement of waste prevention were identified in the Call for Evidence. All, except for the 'consumption of ecolabelled products', received support from respondents.

In addition to the metrics identified in the Call for Evidence, an additional 34 specific examples were presented. These included a very wide range of ideas, for example:

- raw material purchased per tonne of output in a manufacturing setting
- waste generated against revenue per unit of product
- in the case of bars and pubs, liquid output
- measures of product durability using warranty length and 'real' product lifetimes
- the composition and quantity of waste produced per household.

Overall, there was a slight preference for *quantitative* rather than *qualitative* measures.

Three respondents suggested that 'per household' metrics would be helpful in addition to, or in place of, per capita measures in order to capture those purchases which are made for a household as opposed to an individual e.g. furniture, white goods. One respondent highlighted that reusable product categories are not necessarily the same as materials

streams. Therefore, in terms of interventions and measurement of reuse and waste prevention, it was suggested that it is important to first identify whether there is a recognisable market for the produce and if so what is the most appropriate point to prevent them entering the waste stream. Another respondent stated that “Government needs to develop metrics that compare external and internal costs in order to understand where pressures will come from for specific sectors as well as the dynamics that define such costs.” It was also suggested that the Sustainable Clothing Action Plan metrics for carbon, waste and water could be adopted more widely, as well as measures which take account of the social impacts of waste prevention.

Some concern was expressed over the lack of metrics that addressed industry measurement specifically. Respondents from the construction sector were keen to have construction and demolition (C&D) data collected, but deemed their existing metrics (quantities of waste against value of projects) to be more relevant than any of the metrics suggested in the Call for Evidence. Similarly a few respondents indicated that it may be better to have metrics which are relevant to individual sectors as opposed to a ‘one size fits all’ approach.

Ambition over the next 10 years

Respondents were asked for their views on what it would be realistic to achieve over the next 10 years on waste prevention. Responses varied by sector, but in general it was felt that there were still opportunities to reduce waste. Overall LAs were the most focused on targets, suggesting around a 1% reduction in waste per annum. This view however was not supported in a subsequent workshop held with representatives of 45 LAs. Reuse organisations considered there was scope to double current levels of reuse.

Two respondents suggested introducing targets for the construction sector but cautioned that due to the strong correlation between current levels of C&D waste and the economic climate, targets based on current levels of construction waste may later prove unrealistic. For commercial and industrial (C&I) waste, respondents identified a need for better data and that going forwards the focus needed to be on smarter and more sustainable ordering and supply of materials and goods.

Targets

The Call for Evidence sought views on whether targets should be set and if so, what they should be. 20% (20 respondents) were in favour of targets as a concept, but there was no consensus on what the target might be or who it should apply to. Examples of the type of target proposed included a ~1% reduction in household waste per annum, a 5% reuse target for local authorities, a 20% reduction in waste per capita over 10 years and a 25% reduction in construction (excluding demolition) waste over the next 5-10 years. Overall, a preference was expressed by respondents for voluntary rather than mandatory targets.

Some respondents highlighted that targets can result in unintended consequences. The example most commonly cited by these respondents was the damage to products resulting from reducing the weight of packaging to the extent it is unable to protect the product. Similarly local authority respondents were keen to avoid weight-based targets because of the risk of unintended consequences. Several recommended that caution be exercised, particularly if considering the introduction of national or general targets.

Motivations for waste prevention activity

As well as identifying past and ongoing waste prevention activity, the Call for Evidence sought to understand motivations for preventing waste. Responses on this subject focused mainly on the cost savings offered by waste reduction. There was some variation in this however, businesses tended to talk about cost and competitive advantage whereas NGOs cited environmental and social motivations for waste prevention.

Respondents were asked to supply evidence surrounding the use of incentives to encourage waste prevention. Some respondents felt that householders responded to reward schemes whereas businesses were more driven by fiscal measures such as reduced VAT on reused or recycled goods.

Barriers

In addition to identifying the motivations for waste prevention the Call for Evidence sought to identify the barriers to waste prevention. Whilst 58% of respondents broadly agreed with the range of potential barriers suggested in the Call for Evidence, a total of fifty different barriers were described by respondents. Of these, infrastructure which did not support reuse and repair, competing interests (e.g. reuse of timber versus use as a fuel), split incentives (e.g. those undertaking the waste prevention action are not those who recoup the benefits), regulation hindering action and market failures were the most frequently cited.

Economic instruments alongside the need for clear, consistent government leadership were identified as key to driving waste policy and action up the hierarchy and considered necessary for addressing the barriers to waste prevention.

Supply chain

When asked about opportunities for the prevention of waste from the supply chain, the majority of respondents stated that the design phase was the key stage for intervention, followed by producers, consumers and suppliers. Specifically, applying waste prevention during the design phase was said to facilitate the optimisation of processes and the extension of product lifetime. The use of tools such as building information modelling (BIM), life cycle analysis and material flow analysis to reduce waste in the supply chain was supported by respondents.

Reuse and repair

One aspect of waste prevention is to enable products to be used fully until the end of their working life. Reuse and repair are two ways that this can be achieved. The Call for Evidence asked respondents to provide examples of these activities and evidence of factors that were believed to affect the levels of reuse and/or repair reported. The responses received were heavily focussed on reuse, with little on repair.

The reclamation and reuse of building materials was reported to have decreased, largely due to legislation but also it was said to rarely be cost effective to pursue reuse in the construction sector. The demand for reused bulky goods and WEEE was revealed to be outstripping supply, indicating that there is potential for growth in the sector. According to one respondent such opportunities for growth are not necessarily in types of product reused but rather in developing the customer bases for the existing reuse marketplace.

Public sector waste prevention

The Call for Evidence also sought the views of respondents on the role that government and public sector procurement has played and could play in waste prevention, as well as asking for examples of local authority and public sector waste prevention initiatives.

Some respondents felt that by setting an example the government, as a major purchaser of goods and services, could help to drive the necessary changes. Reference was made to the Government Buying Standards (GBS) with a few respondents suggesting that, in order to meet waste prevention targets, GBS should be incorporated into every procurement contract. However, other respondents felt that the GBS were rarely followed.

It was also suggested that incorporation of waste prevention into the design phase should be critical in government procurement and public sector projects and a move to more reuse, repair or leasing of goods as opposed to the purchase of new items would be welcomed.

Two respondents recommended that government take steps to ‘green’ its offices, for example through by using electronic media in place of paper, utilising reusable material in government premises wherever possible, training catering staff on waste reduction practices and a ban on bottled water accompanied by installation of mains-water supplied drinking fountains in all government buildings.

Other respondents were keen to see waste reduction incorporated into the school curriculum to help inform future generations of the importance of waste reduction and for the government to work closely with industry to drive change.

Case Studies

Respondents to the Call for Evidence were asked to share case studies and examples of waste prevention activities and initiatives. Sixty-nine case studies from a variety of sectors were supplied with respondents also signposting a further 18 resources. It was noticeable that few included figures or measures of the associated costs and benefits; underlining the need for suitable metrics to be identified and developed as part of the Waste Prevention Programme going forward.

Government Response

We welcome the evidence and views provided in response to the Call for Evidence, which has been used to develop the Waste Prevention Programme. As a result of the Call for Evidence we have expanded our evidence base, and made a number of changes to the Programme.

In light of the responses received it was decided that plastics should also be included as a priority area in the Waste Prevention Programme. Although the same number of people (17) suggested packaging as a priority material, it has not been added on the basis that card and plastics are already included. This was on the basis of the number of responses received and on the evidence provided on the continuing opportunities for reduction in the area. The recent announcement that government will be taking forward a charge on single use plastic carrier bags is an example of how government intends to support reducing the amount of plastic waste. Equally, government recognises that plastic, and other packaging, has an important role to play in reducing product damage. Voluntary action by industry through for example, the Courtauld Commitment and Fresher for Longer, shows the progress that has been made alongside providing examples of how optimised packaging can help to reduce overall waste.

Responses to the Call for Evidence indicated that metrics based on the quantity of waste generated by unit of economic value and/or by household would be considered appropriate for the measurement of waste prevention and evaluation of the future performance of the Programme. We recognise that there are limitations with these measures, and as such will be working with industry and others to develop a suite of metrics which will enable consistent measurement of, for example, financial, environmental and social impacts. Over time we will look to expand these to include wider environmental impacts.

The importance of design was highlighted as part of the responses. Government agrees that this is a very important area and is developing, through WRAP, a Sustainable Electrical Action Plan, which will bring together existing work and also seek further commitment on designing products for optimum life. Government is also, through the Technology Strategy Board, supporting innovation in design by investing up to £5million in collaborative research and development.

We will also take forward a number of actions aimed at increasing the levels of repair and reuse. In addition to continuing the Reuse Forum, government will also be looking at how to increase consumer confidence in second hand goods, support greater access to goods for reuse to meet demand and make it easier for individuals to access repair and reuse services through the development of a postcode locator.

As part of the Waste Prevention Programme, government will be looking for the best way to share the examples and case studies provided to us from this Call for Evidence. Several of these have been used in the Programme itself, and we believe this can be a valuable way of recognising action and encouraging similar action by others.

Annex A

List of Respondents

Advisory Committee on Packaging
Aldersgate Group
Association of Manufacturers of Domestic Appliances
BAM Construct UK Ltd
Barnett Fernandes Intl. Ltd
Birmingham City Council
British Beer & Pub Association
British Glass Manufacturers' Confederation
British Heart Foundation
British Hospitality Association's
British Plastics Federation
British Retail Consortium
British Soft Drinks Association
British Toy and Hobby Association
Building Research Establishment
Cambridgeshire County Council
Charity Retail Association
Chartered Institution of Water and Environmental Management
Chartered Institution of Wastes Management
Chemical Industries Association
Confederation of Paper Industries
Construction Products Association
Department for Transport
Derbyshire County Council
Devon County Council
Durham County Council
Ecolateral Ltd
EDF Energy
EEF, the manufacturers' organisation
Energy UK
Environmental Industries Commission
Environmental Services Association
Eunomia
FareShare
Federation of British Historic Vehicle Clubs Ltd
Federation of Small Businesses
Food and Drink Federation
Furniture Re-use Network
Gloucestershire Waste team
Greater Manchester Waste Disposal Authority (GMWDA)
Green Alliance
Green Construction Board/Strategic Forum's Waste Subgroup
Hampshire County Council

Hertfordshire Waste Partnership
Health Protection Agency / Public Health England
Industry Council for Packaging & the Environment
International Synergies Limited
Keep Britain Tidy
Kent Waste Partnership
Leeds City Council
Leicestershire County Council
Local Authority Recycling Advisory Committee
London Borough of Lambeth
London Borough of Richmond upon Thames
London Borough of Sutton
London Community Resource Network
London Councils
London re-use Ltd
London 21 Sustainability Network
London Textiles Forum
Merseyside Recycling and Waste Authority
Mineral Products Association
Nappy Alliance
National Farmers Union
Newlife Paints
Norfolk County council
North East Sustainable Resources Board
North London Waste Authority
Nottingham Trent University
Nottinghamshire County Council
Oxfordshire County Council
ReAlliance
Resource Futures
Salvo Llp
Sauce Consultancy, part of 3G Communications
ScrapstoresUK
Shropshire Council
Sustainable Development Unit, National Health Service
SITA UK
Staffordshire County Council
Surrey County Council
Tata Steel Europe
Textile Recycling Association
The Packaging Federation
The Society of Motor Manufacturers and Traders Limited
Timber Trade Federation
United Kingdom Contractors Group
United Kingdom Without Incineration Network
Valpak Ltd
Veolia Environmental Services (UK) Plc
Wandsworth Borough Council
Warwickshire County Council
Waste Matters (UK) Ltd

West London Waste Authority
Western Riverside Waste Authority
Whitegoods Trade Association
WRE Solutions Ltd