

ITEM 5

PAPER NO. WRWA **838**

WESTERN RIVERSIDE WASTE AUTHORITY

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| MEETING | 20 th September 2017 | | | | | | | | | | | | | | | | | | |
| REPORT AUTHOR/DATE | General Manager (Contact Mark Broxup - Tel. 020 8871 2788) 12 th September 2017 | | | | | | | | | | | | | | | | | | |
| SUBJECT | The Mayor of London's draft London Environment Strategy | | | | | | | | | | | | | | | | | | |
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| STATUS | Open | | | | | | | | | | | | | | | | | | |
| BACKGROUND PAPERS | None | | | | | | | | | | | | | | | | | | |

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INTRODUCTION

1. On 11th August 2017 the Mayor of London published his draft London Environment Strategy (LES) and public consultation is open until 17th November 2017.
2. The draft LES is divided into the following six areas:
 - Air quality
 - Green infrastructure
 - Climate change mitigation and energy
 - Waste
 - Adapting to climate change
 - Ambient noise
3. This report is only concerned with the section on Waste and, following a short background and summary of the key points within the LES, it makes observations and proposes a draft response for members to consider.

BACKGROUND

4. [The Greater London Authority Act 2007](#) brought into law a broad package of additional powers for the Mayor of London which included a requirement for waste collection and disposal authorities to act in ‘general conformity’ with the Mayor’s Municipal Waste Strategy. The only exception to this is where it would ‘impose additional excessive costs’ on an authority.
5. The Secretary of State may issue guidance for determining what is to be regarded as acting in general conformity with the municipal waste management strategy, or imposing excessive additional costs on an authority, but, to date, no such guidance has been issued. However, an authority cannot be required to terminate a contract before its expiry or take any action which would result in a breach of that contract.
6. “General Conformity” is a term usually associated with the planning regime. Normally an action or a policy would be considered not to be in general conformity only where an inconsistency or omission of a policy causes significant harm to the implementation of, for example, the Mayor’s Waste Strategy.

7. The Mayor only has powers in relation to waste collected by local authorities.

KEY POINTS

8. The strategy sets out what the Mayor expects waste authorities to do in order to show that they are acting in general conformity.

“They should:

- a) *produce a waste management strategy or plan setting out how their waste activities will:*
 - i. *help move waste up the waste hierarchy*
 - ii. *provide local economic, social and environmental benefits from improved waste management*
 - iii. *make a meaningful contribution to meeting the Mayor’s targets*
- b) *offer the Mayor’s minimum level of household recycling service provision*
- c) *make best use of local waste sites identified in local waste plans*
- d) *support the phase out of fossil fuel waste transport and boost uptake of low or zero emission alternatives*
- e) *use Recycle for London messaging in local awareness raising activities to ensure a consistent reduce, reuse, recycle message is delivered across London*
- f) *demonstrate how they will, or have, put in place positive changes to improve recycling performance identified through Resource London’s borough support programme*
- g) *publicly notify its intention to tender a waste contract at the same time as notifying the Mayor. This would be a chance for waste authorities considering new services to consider joint procurement options. These can provide better value for money on ‘like for like’ services and achieve service harmonisation across borough boundaries*

h) *procure waste and recycling services that maximise local economic, environmental and social benefits through demonstrating how they will deliver the Mayor's Responsible Procurement Policy*

i) *carry out any other relevant activity supporting the Mayor's policies and targets"*

9. The following objectives, together with the policies and proposals proposed to achieve them, are contained within the Strategy:

Objective 7.1

Drive resource efficiency to significantly reduce waste, focussing on food waste and single use packaging waste

Policy 7.1.1

The Mayor will work with Londoners, waste authorities, government and other stakeholders to significantly cut waste

Proposal 7.1.1a

The Mayor will support campaigns and initiatives to prevent food going to waste

Proposal 7.1.1b

The Mayor will support campaigns and initiatives to cut the use of single use packaging

Proposal 7.1.1c

The Mayor will support campaigns, initiatives and business models to reuse materials

Proposal 7.1.1d

The Mayor will lead by example to cut waste and encourage reuse through the GLA group's operations and procurement activities

Objective 7.2

Maximise Recycling Rates

Policy 7.2.1

Increase recycling rates for local authority collected waste

Proposal 7.2.1a

The Mayor will set targets for local authority collected waste, a minimum level of service for household waste recycling collections and hold a contract register of waste authority waste contracts

Proposal 7.2.1b

The Mayor will support efforts to increase recycling rates in flats

Proposal 7.2.1c

The Mayor, through the London Waste and Recycling Board's (LWARB) London Business Waste Recycling (LBWR) service, will support waste authorities to boost commercial reuse and recycling performance

Policy 7.2.2

Increase recycling rates for commercially collected waste and reduce litter and fly tipping

Proposal 7.2.2a

The Mayor will support efforts to consolidate commercially collected waste services to improve recycling performance, reduce congestion, improve the public realm and improve air quality

Proposal 7.2.2b

The Mayor will support waste authorities to reduce littering and flytipping by working with government on the implementation of its Litter Strategy for England

Objective 7.3

Reduce the environmental impact of waste activities

Policy 7.3.1

Reduce emissions from transport of waste

Proposal 7.3.1a

Waste authorities must demonstrate how they will transition their waste fleets to low or zero emission options, prioritising the phasing out of diesel

Proposal 7.3.1b

The Mayor will work with stakeholders to encourage a reduction in municipal waste transported by road and will increase its transportation by rail and river

Proposal 7.2.1c

The Mayor, through the London Waste and Recycling Board's (LWARB) London Business Waste Recycling (LBWR) service, will support waste authorities to boost commercial reuse and recycling performance

Policy 7.3.2

Reduce the climate change impact of waste activities

Proposal 7.3.2a

Waste authorities in delivering their waste management

functions are expected to demonstrate how they can meet the Green House Gas (GHG) Emissions Performance Standard (EPS)

Proposal 7.3.2b

Waste authorities must demonstrate how solutions generating energy from waste meet the carbon intensity floor (CIF) or put in place demonstrable steps to meet it in the short-term

Objective 7.4

Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces

Policy 7.4.1

Supporting the use of local waste sites and promoting a circular approach to waste management

Proposal 7.4.1a

Waste authorities in developing their waste contracts and services will need to identify how to maximise the use of local waste facilities and identified sites for waste

Proposal 7.4.1b

The Mayor will support the development of new waste infrastructure supporting circular economy outcomes reuse, repair and remanufacture

OBSERVATIONS

General conformity

10. The generalised actions, set out in paragraph 8 above, that the Mayor expects waste authorities to do in order to show that they are acting in general conformity with his strategy, are nothing beyond what the Authority would

expect to do as a matter of course. The Authority, and its constituent councils, fully support the application of the waste hierarchy.

Objective 7.1

Existing Authority policy is fully compliant with the Mayor's Objective 7.1 (to drive resource efficiency to significantly reduce waste, focussing on food waste and single use packaging waste), together with its associated policies and proposals.

However, the Mayor's strategy does fail to call for producer responsibility in this area as advocated by the Authority.

Objective 7.2

11. The Mayor's objective is to maximise recycling rates by weight, but unfortunately, as described in Paper No. WRWA 832, June 2017, this can lead to outcomes which are in conflict with the waste hierarchy.
12. Before 2010 'Municipal Waste' only referred to the household and commercial waste collected by local authorities. From 2010 the definition of 'Municipal Waste', as described in the Landfill Directive, included both household waste and waste from other sources which is similar in nature and composition. This new definition therefore includes a significant amount of waste not collected by local authorities. A new definition, 'Local Authority Collected Waste' (LACW), was then created to describe that element of the Municipal Waste stream which is managed by local authorities.
13. No one really knows how much waste 'similar in nature and composition to household waste' is being independently generated, managed and recycled by London businesses, but the Mayor has estimated it to be 3.3 million tonnes per annum and that somewhere between 65% and 70% of it is being recycled.
14. In contrast, LACW waste is put at around 3.7 million tonnes with a current recycling rate of 32%.
15. Combining these two waste streams gives a total municipal tonnage of around 7 million tonnes per annum of which 52% is currently estimated by the Mayor as being recycled and, in terms of municipal recycling, this puts London 3rd in

recycling performance, behind Seoul 67% and Adelaide 54%, in a list of global cities.

16. Based on this current estimated performance level of 52%, the draft strategy sets a **municipal waste recycling target of 65% by 2030.**
17. The Mayor also predicts that the recycling performance of independent London businesses will rise to 84% by 2030. As a consequence the current 32% LACW recycling rate will need to rise to 42% by 2030, however the Mayor has set a **Local Authority Collected Waste (LACW) recycling target of 50% by 2030.**
18. The draft strategy acknowledges that, in achieving an overall target of 50%, some authorities will achieve lower rates than others, recognising in particular the challenge for boroughs with a high proportion of flats, and the consultation asks if the Mayor should consider setting borough specific household waste recycling targets.
19. The strategy says that that the Waste Resources Action Programme (WRAP) believes that an increase from the current LACW recycling rate of 32% to 42% is feasible by 2022. This 10% percentage point increase is achieved by an unexplained 3% from "Business as Usual", 2% from food waste collections, 3% from introducing fortnightly residual waste collections and 2% from a range of unspecified interventions with flats.
20. **The most significant proposal within the draft strategy is the Mayor's intention to introduce a minimum level of service which would require all properties with kerbside recycling to receive a weekly food waste collection by 2020.**
21. Generally the constituent councils have not, to date, found separate food waste collections to either be economically viable, or offer any real environmental benefit.
22. The draft strategy claims that introducing separate food waste collections "has been proven to boost recycling rates and reduce contamination with dry recycling materials", but no evidence is provided to substantiate it.
23. The strategy believes the gap from 42% LACW recycling to the 50% target can then be achieved through increased collection and recycling of commercial waste, but historically this Authority's experience has been that commercial

waste recycling has actually depressed LACW recycling performance and increased contamination levels.

24. Disappointingly, there is no mention whatsoever of the Mayor lobbying for producer responsibility to contribute to increased recycling rates. The Authority's policy is that the producers and retailers should be given responsibility for recycling the products and packaging they put into the market, not local authorities.
25. There is also no mention of how Incinerator Bottom Ash Aggregate could contribute to the meeting of targets.

Objective 7.3

26. The Authority fully supports the principle of reducing the environmental impact of waste activities and it already transports all of its residual waste by river for energy recovery.
27. Generally, the Authority's ability to meet the proposed Green House Gas Emissions Performance Standard and the Carbon Intensity Floor are constrained by contractual requirements, but the Authority will welcome the news that the Mayor will work with operators to support the implementation of combined heat and power opportunities.

CONCLUSIONS

28. From the Authority's perspective the draft strategy introduces very little that is new and places no real obligations on the Authority beyond what it would reasonably consider doing itself.
29. Overall, the waste section within the draft strategy is disappointing. There is very little new thinking in it. It does not recognise that waste minimisation is the real target local authorities need to achieve and beyond that a minimisation of residual waste. This waste section is essentially a rehash of the previous Mayor's waste strategies with only two real changes (neither of which particularly help waste authorities):
 - a) The proposal to require the introduction of separate food waste recycling collections which, if the food is already going to energy recovery, may be of little or no environmental advantage (it is recommended elsewhere on this

agenda, Paper No. WRWA 837, that the impact of separate food waste collection both environmentally and economically be further investigated with a proposed trial in the Royal Borough of Kensington and Chelsea); and

- b) the use of the new definition of municipal waste to effectively lower the target for Local Authorities from 65% to 50%.
- 30. There is no call for producer responsibility in this area or a recognition of the importance in engendering real behaviour change. If the Mayor really wants to stop the use of disposable coffee cups then vendors need to be properly incentivised to stop giving them out, as otherwise the vast proportion of the public will still continue to opt for the most convenient option.
 - 31. There is no call for a disaggregation of garden waste from the recycling statistics (so consequently London will continue to appear to perform badly compared to other regions) and there is no investigation of any real alternative to a weight-based recycling target.
 - 32. There is no consideration given to the role that markets play (there is no point in separately collecting material if no markets exist for it) and historically this has been a major problem for plastics. There is no consideration given to contamination or material quality generally.
 - 33. There is no positive recognition of the role Energy from Waste has played in reducing the use of landfill, or the fact that by-products of that process can replace the use of virgin aggregate in the construction industry.

CONSULTATION QUESTIONS

- 34. The draft strategy contains the following six consultation questions:
 - a) Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?
 - b) Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?

- c) Do you think the Mayor should set borough specific household waste recycling targets?
- d) What needs to happen to tackle poor recycling performance in flats?
- e) What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?
- f) Please provide any further comments on the policies and programmes mentioned in this chapter.

DRAFT RESPONSE

35. A draft response to the consultation is attached as an appendix to this report and the Authority is asked to approve it as drafted and/or instruct officers as to how it should be amended.

RECOMMENDATIONS

36. The Authority is recommended to:-
- a) Approve the draft response to the Mayor of London's consultation on the waste section of his proposed London Environment Strategy, attached as Appendix A to this report, and/or instruct officers as to how it should be amended; and
 - b) otherwise receive this report as information.

M. Broxup
GENERAL MANAGER

Western Riverside Transfer Station
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12th September 2017



Western Riverside Waste Authority

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Dear Mr. Mayor,

RE: DRAFT LONDON ENVIRONMENT STRATEGY – CHAPTER 7 WASTE

Please find below Western Riverside Waste Authority's response to your consultation on the Waste section of your draft Environment Strategy. This response is as approved by the Authority at its meeting on 20th September 2017.

The Authority was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulation and Disposal (Authorities) Order 1985. The Authority assumed responsibility for managing the waste collected by four London Boroughs; Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.

The Authority fully supports the waste hierarchy and all material under its control is sent for re-use, recycling or energy recovery, with less than 1% of material, post energy recovery, being sent to landfill. The Authority's contractual arrangements also fully support the waste hierarchy; there are no limits on how much it can reduce, reuse and recycle its waste and there are very significant financial advantages to its constituent councils in doing so.

The Authority considers that the Waste section of your draft Environment Strategy is missing an important opportunity for London to achieve real positive environmental outcomes, whilst in turn not placing additional cost burdens on waste authorities.

The Authority welcomes the increased emphasis on waste minimisation, but coffee cups and plastic bottles are a minor part of the waste stream and local authorities will not affect behaviour change on their usage – only producers, packer and retailers will do that.

Indeed, the Authority urges the Mayor to strongly lobby Government to move the responsibility for meeting all post-consumer waste management targets away from local authorities and onto the retail industry as a whole (i.e. the producers, packers and retailers of goods). The retail industry controls what is placed on the market and how it is sold, marketed and packaged.

The Waste section also lacks cohesion with other elements of your strategy, there is:

- no mention in the Climate Change section of the positive role that Energy from Waste already plays in reducing London's greenhouse gas emissions by reducing the use of landfill;
- no mention in the Energy section of the contribution Energy from Waste is already playing in providing baseload renewable electricity – absolutely vital as electric vehicles replace petrol and diesel models;
- no mention in the Air Quality section of the role that transportation of waste by river and rail is already playing in reducing HGV traffic movements;
- no mention in the Circular Economy section of the role that aggregates produced from ash from Energy from Waste facilities already play in reducing demand for virgin aggregate – this is a good example of the Circular Economy already operating in practice.

The Waste strategy repeatedly confuses the concepts of 'incineration without energy recovery' and 'Energy from Waste'. It also carries an unwarranted and damaging predisposition against tried and tested energy recovery technologies in favour of alternatives that would provide little or no additional benefit and come with a long track record of failure.

In 2016, England's six statutory joint waste disposal authorities (four of which are in London), who collectively manage around 15% of England's Local Authority Collected Waste (LACW), jointly agreed a set of key points that they believe are critical to England achieving the correct environmental outcomes, but without placing additional cost burdens on waste authorities.

- There needs to be greater clarity over where the costs associated with recycling, and the circular economy generally, should fall. This requires clear, long term, national policy to move cost burdens further up the commodity chain towards the primary stages of resource extraction and processing, rather than imposing additional cost at the local authority end of the chain of utility. The Authority would urge the Mayor to lobby Government strongly for this.
- Weight-based recycling targets do not encourage the best environmental or economic outcomes and the Authority is disappointed that the Mayor has not taken this opportunity to fully explore the potential and viability of alternative metrics. Whilst a CO₂ equivalent based system might be the most appropriate, others metrics that could be considered include avoided energy use, minimisation of residual waste, or even simply monetary value. Consideration could also be given to applying metrics on a material specific basis and based on improvement from current performance. Indeed, whilst this Authority appears to perform badly in terms of a weight-based recycling target, the UK's first local authority waste management carbon league table (published by Ricardo AEA in August 2015, based on 2013/14 data) found that how the Authority managed its waste as a whole resulted in some of the lowest carbon impacts in London and nationally.
- Under the current tonnage based target framework, the ability of local authorities to achieve high recycling rates is largely determined by factors outside their control, such as the availability of garden waste and property type. The Authority is therefore disappointed that the Mayor has chosen to apply a top down 50% LACW recycling target which bears no relationship to the ability of London boroughs' to achieve it. It would be better to have jointly assessed with each borough how it could realistically improve its performance and then aggregated that into a SMART target for London as a whole.
- The opportunity has also been missed to clearly separate recycling performance between garden waste and post-consumer material. Additionally, the Environment Strategy should recognise that the ash from

modern Energy from Waste facilities is recycled for use by the construction industry in place of virgin aggregates.

Many recent studies have highlighted that London is unlikely to have sufficient Energy from Waste (EfW) capacity to manage London's non-recyclable municipal waste post 2025, especially if the Mayor's recycling targets are not achieved. It would be better for the Strategy to reflect an open mind on the need for further EfW capacity, as otherwise it may be difficult to attract the private sector investment necessary to deliver it.

Answers to your specific consultation questions are attached to this letter for your consideration.

Yours sincerely,

MARK BROXUP
GENERAL MANAGER

DRAFT LONDON ENVIRONMENT STRATEGY – CHAPTER 7 WASTE**Consultation Response from Western Riverside Waste Authority*****Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?***

The Authority agrees that the Mayor's draft policies and proposals will help to increase the tonnage recycled, but the Authority does not believe that this will necessarily be a benefit for London either environmentally or economically in all cases.

Previous studies by this Authority using the Environment Agency developed life cycle analysis tool "WRATE" has shown there to be little or no environmental benefit from separately collecting food waste in the Authority's area and, to date, the majority of its constituent councils have found the additional collection costs to be prohibitive (outweighing any treatment savings).

Whilst recycling more commercial waste will be good for London's environment, it has historically led to a decrease in Local Authority Collected Waste (LACW) weight-based recycling performance. The recycling performance of commercial waste collected from Small Medium Enterprises (SME) has always been a number of percentage points below that of the Household rate and, in the Authority's experience, it has generally brought more contamination with it too. There is a big or great difference between the recycling performance that large retailers can achieve, in a closed loop environment, compared with what local authorities can realistically achieve collecting from a diverse range of third party SME's.

Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?

As described above, previous studies have found there to be little or no environmental benefit from separately collecting food waste in the Authority's area and, generally, its constituent councils have found the additional financial costs of collection to be prohibitive.

The Authority is currently looking to see what more it can actively do to reduce food waste in its area and therefore it supports the Mayor's identification of the Courtauld Commitment 2025 as a key initiative for London, as well as his support for the Trifocal project.

Lambeth, one of the Authority's constituent councils, is a 'pioneer' Trifocal borough and it is hoped that, when the project goes into its delivery phase later this year, positive outcomes will result. The Authority does have some concerns, though, with the 'Love Food Hate Waste' campaign and whether it may be 'preaching to the converted'. The Authority believes that there needs to be a greater focus on households whose lifestyle include more convenience and processed food, rather than home prepared foodstuffs.

LWaRB might also consider supporting the development of apps that could link to product barcodes or till receipts to help remind users of approaching 'use by' dates on foodstuffs that they have bought.

All the Authority's constituent councils already collect all the Mayor's six main recycling materials, plus some of its councils already offer food and garden waste collections. However, despite those incentives, the Authority's household weight-based recycling rate is currently around 26% and, including commercial waste, its Local Authority Collected Waste (LACW) recycling rate is around 21%.

Recent work by the Authority indicates that realistically it may be difficult to increase a weight-based LACW recycling target to much beyond 30% in its area. A large reason for this is the difficulty engendering real and sustained behaviour change in residents. This is something the retail industry is far more able and better placed to achieve by changing how it sells and packages goods and how it can directly incentivise consumers or customers to reduce, reuse or recycle the items they buy.

Also, whilst good behaviour needs to be incentivised, this does need to be supported by a duty to recycle and powers of enforcement where there is failure to comply. Therefore waste authorities should continue to play an important role in supporting the retail industry in achieving targets, but waste authorities should not be responsible for either their achievement or the associated financial costs.

The Mayor's Strategy contains little or no recognition of the critical role that markets play in recycling. At times, it is not even possible to pay to recycle mixed plastics and, as you cannot store it indefinitely, the only option is to send it for energy recovery.

It is unlikely that the current markets could support the achievement of a 65% municipal recycling target, either in terms of capacity or the range of materials accepted. Without sustainable markets waste authorities will not be able to recycle the material collected. The Mayor needs to lobby Government for a mechanism to deliver longer term market certainty so as to ensure that the reprocessing capacity and demand is developed in time for additional materials and new types of materials to be presented for reprocessing.

A programme to harmonise collection systems would be broadly welcomed. However, this work should recognise that the range of materials collected needs to be determined by markets which will need to be able to absorb the volume of materials that will result from a range of common systems.

Do you think the Mayor should set borough specific household waste recycling targets?

No.

Firstly, it would be confusing to introduce yet another target. The Strategy talks mostly about Municipal and Local Authority Collected Waste (LACW) and introducing a household waste target as well would be confusing.

Secondly, the overall 50% LACW target has been arbitrarily set from the top down.

An analysis of what each borough is currently recycling, and what it could realistically achieve in the timeframe of the Strategy, has not been carried out. This could have taken into account borough specific factors and constraints, such as density of population and housing stock, together with any contractual limitations and timeframes.

The Authority's own composition analysis shows that it is already recycling a very large proportion of the paper and glass in its area and, with relatively few gardens, it may be difficult for it to increase its overall LACW recycling rate from its current level of 21% to a level far in excess of 30%. The Authority is currently investigating whether or not an increased focus on waste minimisation might be better, both environmentally and economically. However, minimising the tonnage of material that is currently being recycled will, whilst achieving the best real outcomes, perversely reduce performance against a weight-based recycling target. Waste minimisation is the primary target that waste authorities should be striving to achieve.

The Strategy focuses on plastic bottles and coffee cups, yet the 125,000 tonnes the Strategy says are produced in London each year represents only 3% of London's 3.7 million tonnes of LACW, and a proportion of it is recycled already. In terms of a weight-based recycling target these are not therefore priority materials. A greater focus on minimising the amount of food waste, garden waste, nappies, textiles and waste electricals in the residual waste stream would achieve far greater environmental and economic savings.

The Authority does agree that plastics generally should be a priority material, but it feels that the Mayor has missed the opportunity to change from the outdated weight-based metric and put a proper environmental target at the forefront of his waste strategy.

It is also difficult to see what meaningful role local authorities can play in changing the use of plastic bottles and coffee cups. It is the convenience of these products that makes them so popular and it will be very difficult, if not impossible, for local authorities to engender real behaviour change in areas such as this. The only people who can effectively influence behaviour change in areas such as this are retailers.

Total waste levels in England, London and the Authority's area have all fallen in recent years and the level of recycling has risen, but now plateaued across them. If we ignore garden waste and analyse just the post-consumer waste stream it is striking how similar waste trends are on a local, regional and national level. This suggests that it is not local waste authority initiatives that are determining performance in this area, but broader changes in the packaging and marketing of goods, as well as wider economic factors, that are the real drivers behind the waste we produce and how we are able to manage it.

The Authority does not believe that the Mayor should simply be aiming to work with producers and retailers in this area. The Authority believes he should be actively lobbying Government to make producers, packers and retailers responsible for post-consumer recycling and circular economy targets – not local authorities.

Producers, packers and retailers dictate how their products and packaging change and evolve and consumers have effectively very limited or no choice in the products they buy and how they are packaged (for example it is very difficult to buy cornflakes in anything other than a cardboard box, or to find a television that is demonstrably easier to repair than another model). Consequently, the producers, packers and retailers should also have the responsibility, both environmental and economically, to manage their products and packaging, in accordance with the waste hierarchy, after their customers have used them.

However, there also needs to be a recognition that post-consumer recycling is only part of packaging's lifecycle and there may be instances where the use of a difficult to recycle piece of packaging can be justified if its properties lead to greater environmental benefits upstream, e.g. if it significantly extends the freshness of a foodstuff.

What needs to happen to tackle poor recycling performance in flats?

This question is better answered by collection authorities but, despite many different initiatives over many years, recycling performance in high rise properties remains a persistent and significant problem across the country and is not unique to London. It is also hard to think of an initiative that hasn't already been trialled in some form or another without success.

Experience would show that retailers are the real experts in behaviour change, particularly as they control what products consumers receive and influence how those products are used. Producer and retailer obligations are already established for End of Life Vehicles and Waste Electrical and Electronic items and the Mayor should actively lobby for these principles to be extended to all post-consumer products and packaging. This would undoubtedly accelerate waste reduction, the uptake of the circular economy and improvements in London's recycling performance.

What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?

Make the producers, packers and retailers legally responsible for recycling them.

Please provide any further comments on the policies and programmes mentioned in this chapter.

This Strategy, as previous ones have done, unfairly and unjustifiably portrays Energy from Waste in a negative light. It clumsily uses the term “incineration” and confuses it with energy recovery. The first paragraph of the waste section states that:

“Landfill and incineration are undesirable, costly and an inefficient use of resources.”

This should be amended to more accurately say:

“Landfill and incineration **without energy recovery** are undesirable, costly and an inefficient use of resources.”

Similarly, the section on “Incineration” should more accurately be entitled “Energy Recovery”. This section explains that the amount of tonnage going to Energy Recovery has doubled since 2011 with this increase in tonnage coming from a corresponding reduction in landfill. A more balanced approach would be to quote the CO₂ emission savings that have resulted as a consequence.

The draft Strategy says that London will have sufficient Energy from Waste capacity to manage London’s non-recyclable municipal waste once the new Edmonton and Beddington Lane facilities are operational. However, this presupposes that the Mayor’s ambitious recycling targets will be achieved.

Other modelling has identified that, more realistically, there will be a significant gap between the treatment capacity necessary to handle London’s residual waste and the capacity available, even after considering that potentially available in the Home Counties. The Mayor’s Strategy should reflect an open mind in respect of the need for further EfW Facilities for residual waste treatment, as otherwise it may be difficult to attract the private sector investment necessary to deliver it.

Whilst the Authority believes that an alternative metric to weight-based recycling performance is necessary to better measure waste performance, and a CO₂ equivalent based system might be the most appropriate, it remains unconvinced (as it was in 2011) that the Mayor's Emissions Performance Standard and Carbon Intensity Floor have been sufficiently well developed or subjected to an adequate level of academic scrutiny to be properly regarded as being fit for purpose.

No mention is made in the strategy of the recycling of the ash from Energy from Waste Facilities, which is used as a replacement for virgin aggregates by the construction industry. This is a real example of the circular economy actually working in practice. The Mayor could, through the planning process, actively encourage the use of this material in construction projects and should reflect its beneficial use by including it in the calculation of recycling targets.

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