

# London Environment Directors' Network position: London's resources and waste system

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## Summary

The significant environmental and financial costs of our current resources and waste system demand an ambitious and collective response. The London Environment Directors' Network (LEDNet) believes that our approach must be founded on the need to significantly reduce the waste we create and foster a primarily circular economy.

To achieve this, the UK's resources and waste system must become more integrated: national policy should reduce wasted and non-recyclable (i.e. non-circular) materials, and establish an extended producer responsibility system that adequately funds the costs of managing resources and waste. Together, these measures will help to alleviate the substantial and ongoing financial pressure on councils and enable them to deliver a high quality and quantity of recycle, with all the co-benefits that they bring to delivery of waste and recycling services – experience, trust and connection to communities.

At a London level, LEDNet is broadly very supportive of the new London Environment Strategy (LES), particularly its focus on the circular economy, waste minimisation and reuse. We support the Strategy's asks of national government in relation to reforming producer responsibility, and its call for devolution of landfill tax receipts, though we believe this should be considered in the context of London Government's wider ambitions for devolved funding and powers. We would not be supportive of taxation linked to disposal by way of energy from waste (incineration), as this simply adds unavoidable cost to waste disposal.

We recognise that both waste disposal and collection across our capital is confused and/ or inconsistent, and that the system could be more effectively aligned to drive the right behaviours and outcomes. The LES' introduction of a minimum offer of six dry recyclables will support a consistent offer from local authorities, and we will work closely with the Greater London Authority (GLA) and the London Waste and Recycling Board (LWARB) to ensure that our operational expertise informs effective, practical delivery of this and other targets. LEDNet can also act as a test-bed for innovation, building evidence-based approaches, learning from other cities and seeking to create scalable solutions.

To deliver London's resources and waste targets and move towards the circular economy, LEDNet has set out in this position what we ask of others and what we offer as London waste authorities.

## LEDNet's principal asks

### National government should:

- Put in place targets that prioritise reduction of residual waste and capture all material that is reused or recycled;
- Deliver a national behaviour change campaign that reduces waste and increases reuse and recycling;
- Ensure that there is an effective and coherent financial and regulatory framework that incentivises pro-circular economy action through the whole life cycle of resource use and eventual disposal – this should include:
  - An extended producer responsibility system, based on the polluter pays principle, that secures the necessary financial resources to deal with the whole life costs of products and packaging, addresses the recyclability of products and supports the market for recycled materials
  - Regulation and fiscal measures to reduce waste in production, including banning and phasing out the use of non-recyclable materials and reducing the number of plastics that can be used in products and packaging
  - Mandatory use of clear, consistent on-pack recycling labelling
  - Planning policy that supports mandatory provision of adequate recycling and waste storage and collection facilities in all new developments
  - Enabling local authorities to enforce against incorrect presentation of waste and contamination of recycling, including landlords and/ or managing agents where there are communal bins
- Increase funding for food waste recycling, particularly in flatted properties.

### The Greater London Authority should:

- Work with LEDNet and others towards a common vision for delivery of London's resources and waste objectives, based on a clear implementation plan and adequate financial resources;
- Increase support for effective London-wide behaviour change campaigns;
- Ensure that the London Plan supports mandatory provision of adequate recycling and waste storage and collection facilities in all new developments; and
- Enable local authorities and Waste Disposal Authorities to support increased commercial recycling.

### Businesses should:

- Commit to the highest design standards, which reduce waste, extend useable product life, incorporate high levels of recycled materials, and ensure recyclability;
- Take part in local business responsibility activities; and
- Increase their reuse and recycling participation.

## LEDNet's principal offers

### We will work with the GLA, LWARB and the Waste Disposal Authorities to:

- Work towards a common vision for delivery of London's resources and waste objectives, based on a clear implementation plan and adequate financial resources;
- Support greater collaboration between members on common and shared services;

- Support effective behaviour change campaigns;
- Increase the simplicity and consistency of communications around household waste and recycling;
- Trial methods of restricting residual waste collections;
- Support councils' abilities to use effective enforcement action;
- Increase the efficacy of enforcement;
- Pilot innovative reuse schemes, including 'products as a service' approaches;
- Explore improved commercial recycling offers from councils;
- Research innovative means of increasing reuse and recycling, including of food waste; and
- Improve the efficacy of London's waste disposal arrangements.

## London's resources and waste system

### London's current waste system

London produces around seven million tonnes of municipal waste every year, of which around 75% is 'local authority collected waste' with another 25% collected by commercial operators.<sup>1</sup> 52% of London's total municipal waste is recycled, but only 33% of local authority collected waste, which sits 10 points lower than the England average.<sup>2</sup>

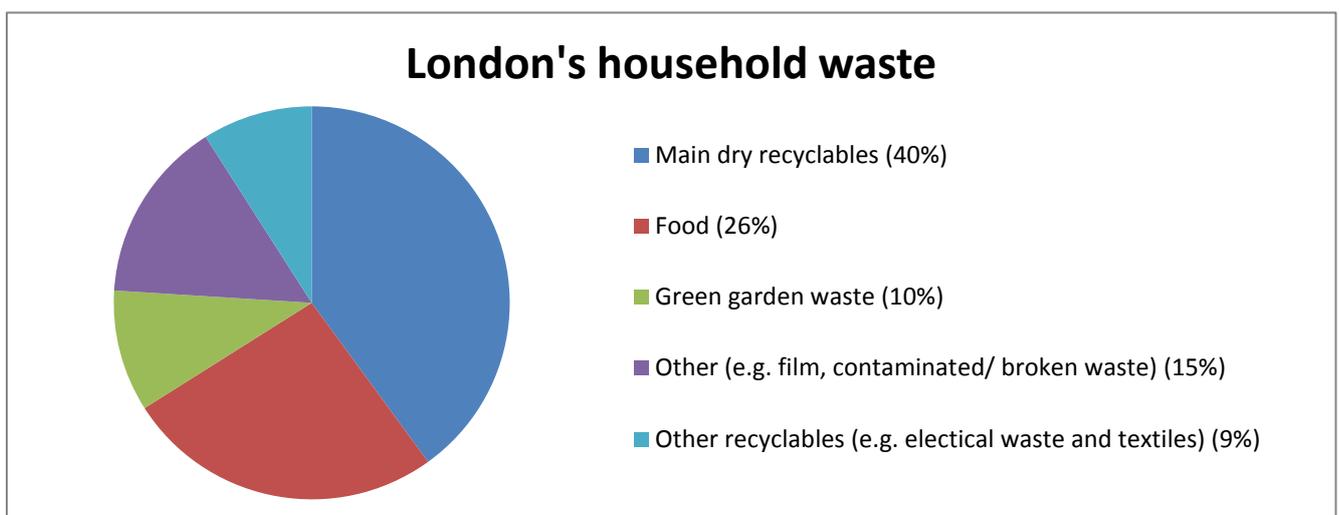


Figure 1: source: London Environment Strategy

Around 1m tonnes of London's waste goes to landfill every year, costing around £100 million.<sup>3</sup> However, landfills accepting London's waste are due to close by 2026. The new draft London Plan proposes to set policies for identification and safeguarding of sufficient capacity to manage our waste within the city.

### Objectives of London's waste system

The London Environment Strategy has set out the following targets for London's waste system:

<sup>1</sup> Defra, 2017, 'Local Authority Collected Waste Statistics - Local Authority data'

<sup>2</sup> Defra, 2017, 'Local Authority Collected Waste Statistics - Local Authority data'

<sup>3</sup> Greater London Authority, 2018, *London Environment Strategy*

- by 2025, 50% local authority collected waste recycled
- by 2025, 20% food waste (and associated packaging) reduction per person
- by 2026, zero biodegradable or recyclable waste to landfill
- by 2026, 100% London's waste managed within the city
- by 2030, 50% food waste (and associated packaging) reduction per person
- by 2030, 65% municipal waste recycled
- by 2041, zero waste
- by 2050, zero carbon

To support this, the Mayor expects that waste authorities will deliver:

- a minimum collection of the six main dry recycling materials for all properties<sup>4</sup>
- a separate weekly food waste collection for all properties, extended to flats where viable

## How can the objectives of London's resources and waste system be met?

### Driving progressive action

The resources and waste system is complex and interconnected. Nationally, we need a robust, coherent policy framework that moves us towards the circular economy. To complement this, we need performance metrics for local authority resource and waste management that rebalance efforts towards the resources system as a whole, in particular reducing waste, capturing all material that is reused or recycled and reducing greenhouse gas emissions.

At a London level, LEDNet supports the Mayor's target for 50% recycling of local authority collected waste by 2025 and 65% recycling of municipal waste by 2030. The LES recognises that the 50% target will be collectively met by London waste authorities. To facilitate this, we propose a collective conversation that transparently addresses how that target will be met across the boroughs and what support will be provided to them to achieve this. For example, additional financial support for infrastructure to support recycling in flats, given that on average 50% of London's population already live in flats, with up to 80% in some boroughs.

We also need to cultivate a shared understanding of the constraints to delivery in London and how they can most effectively be addressed, as well as future trends in resources and waste composition. This can then form the basis of a shared vision of how London manages its waste and accelerates our move towards the circular economy, backed with a clear implementation plan and adequate resources.

### Communications and behaviour change

Generating public interest and engagement with resources and waste management is an essential complement to the technical efforts of government and businesses. Blue Planet II has shown us the power of communications that effectively link our everyday habitats to the devastating impacts of poorly managed

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<sup>4</sup> Glass, cans, paper, card, plastic bottles and mixed plastics (tubs, pots and trays)

waste on the natural environment, in particular our collective failure to reduce avoidable waste – such as plastic water bottles.

Nationally, the government should deliver behaviour change campaigns around reuse, recycling and waste, working with WRAP / Recycle Now, local authorities and organisations such as Keep Britain Tidy, with the aim of:

- addressing consumption, by encouraging people to choose products with high proportions of recycled material; and
- addressing disposal, by encouraging people to take responsibility for their waste, and to avoid littering or fly-tipping.

Behaviour change campaigns should be supported by the national curriculum, to ensure that young people are learning about waste and the circular economy from an early age.

As LEDNet, we will work with LWARB and others to deliver effective behaviour change through communications campaigns and interventions that reach all London boroughs. For example, we have worked with Keep Britain Tidy to identify behavioural drivers of fly-tipping, a problem that costs London boroughs around £18m/ year.<sup>5</sup> In the forthcoming second stage of this work, we will be piloting solutions that build on those insights, and creating scalable approaches to reducing fly-tipping.

## Minimisation of waste

Waste minimisation is the most important aspect of the waste hierarchy. Nationally, the government needs to introduce an extended producer responsibility system, in order to ensure a transparent and fair distribution of costs across the system (see below). It should also establish ambitious targets for waste minimisation, ban and phase out the use of non-recyclable materials, reduce the types of plastic that can be used in products and packaging, and use fiscal measures to disincentivise single use products and packaging, and those with built-in redundancy. These measures will support secondary markets and simplify the system in a much more efficient manner – in terms of cost and environmental impact – than putting the costs and complexity onto waste authorities at ‘end of pipe’, as is currently the case.

LEDNet supports a levy on single use plastics at production and consumption stage. Based on the results of the 5p plastic bag charge, we believe this would effectively reduce their use to the limited circumstances where they are unavoidable (for example, in some medical equipment). We would welcome further national emphasis on using whole life cycle costing of products and packaging to drive waste reduction nationally.

Businesses need to play their part, aside from engaging in the formal producer responsibility system. LEDNet would like to see businesses: committing to the highest design standards, which reduce waste, extend useable product life, incorporate high levels of recycled materials, and ensure recyclability; and taking part in local business responsibility activities to support waste reduction in the local economy.

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<sup>5</sup> 2018, ‘ENV24 - Fly tipping incidents and actions taken in England’, <https://www.gov.uk/government/statistical-data-sets/env24-fly-tipping-incidents-and-actions-taken-in-england>

We welcome the LES' emphasis on waste minimisation. Waste collection systems can support minimisation by restricting the amount of waste that can be collected from individual households and businesses. LEDNet anticipates trialling new approaches to achieving this. Local government can also support local business responsibility schemes through local taxation.

### ***Producer Responsibility***

Nationally, we need an extended producer responsibility system, based on the polluter pays principle, that secures the necessary financial resources to deal with the whole life costs of products and packaging, and drives a more 'circular' production by increasing the recyclability of products and supporting the market for recycled materials. This will play a significant role in enabling local authorities to deliver the best possible reuse and recycling services and support the circular economy. At the moment, local authorities – i.e. taxpayers – bear on average 90% of the costs of the waste system, with only 10% born by producers.<sup>6</sup>

An extended producer responsibility system should:

- **Polluter pays**: embed the polluter pays principle and ensure that what producers pay reflects the whole life costs of reusing, recycling or disposing of the waste they create;
- **Governance**: establish a cross-sector governance body to a) transparently allocate the funds generated through the producer responsibility system and secure sufficient funding for those who bear the costs of reuse, recycling and disposal of products and packaging, and b) develop the Approved List of recyclable materials/ products, where 'recyclable' means functionally, not literally, recyclable;
- **Content**: ensure that products and packaging are 100% recyclable and use a high proportion of recycled materials;
- **Producer Responsibility Note (PRN) management**:
  - Require PRNs to be purchased for each polymer type used, so that recycling is in proportion to material use;
  - Require a higher standard of evidence for the allocation of PRNs and Packaging Waste Export Recovery Notes (PERNs) than is currently the case;
  - Ensure that allocation of PRNs and PERNs is more transparent; and
  - Ensure that the value of PRNs is higher than PERNs, to promote the development of national and regional infrastructure over export.

### **Keeping materials in use**

To achieve a circular economy, we need to keep resources in use for longer, by putting more emphasis on reuse and repair.

Nationally, the government must ensure that higher reusability and recyclability obligations are required for products and packaging, via extended producer responsibility (see above).

In London, local authorities can support businesses and consumers to reuse products and packing. LEDNet will support this through piloting 'product as a service' models, trialling sharing facilities in developments,

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<sup>6</sup> Environmental Audit Committee, 2017, *Plastic bottles: Turning back the plastic tide*.

using land designated for waste purposes to support reuse and repair facilities, and supporting reuse and repair shops like ['Bright Sparks'](#) in the London Boroughs of Islington and Waltham Forest.

## Increasing the quality and quantity of recycling

Where materials cannot be reused, they should be recycled, retaining the highest possible use value. Recycling has long been a central part of the waste management system, with stretching targets set at European and national level. We believe high rates of recycling are possible, but only where all players in the system are working together and fairly sharing out responsibility and costs for meeting those targets.

Wherever possible, we should be designing out waste and designing in reuse and recycling. This is why we want to see new rules that minimise waste within production (see above), and why we believe waste needs to be given greater weight in the planning system. This will move the emphasis and cost to those putting products on the market, and ensure that good resource management is designed in from the beginning, making recycling and disposal easier for residents and waste authorities.

Approaches that seek to positively change recycling and waste behaviour should be complemented by effective enforcement powers. Persistent incorrect presentation of waste, and contamination of recycling, has a significant environmental cost and creates an unnecessary financial burden on local authorities. Where this happens, local authorities need to be able to enforce against residents. The powers also need to be expanded to allow authorities to serve notices on the landlords and managing agents of properties where communal-use containers are deployed, where the council has no direct service relationship with individual occupiers.

We believe that bioplastics and biodegradable plastics create more problems than they solve, because the difference between them, and between them and recyclable plastics, is poorly understood by consumers; this leads to increased contamination – and therefore costs to local authorities – in both food waste and dry recycling streams. Neither biodegradability nor bioplastics are a long-term solution to the over-use and environmental impact of plastic.

Building on action to minimise waste, we therefore need to optimise recycling rates by supporting an effective market for recycled materials, which will in turn support local authority action in this area and the public's trust in the system.

Nationally, we need to:

- continue to support the Recycle Now campaign to drive pro-recycling behaviours;
- ensure mandatory use of clear, consistent on-pack recycling labelling;
- incentivise recycling through deposit return schemes, whilst ensuring that they complement current recycling systems;
- allow local authorities to capture the reuse or recycling of Incinerator Bottom Ash (IBA) as a secondary aggregate within recycling tonnages, in line with Wales;
- introduce enhanced mechanisms to incentivise commercial recycling levels and capture these tonnages in order that all waste generated in an area is counted;

- strengthen waste management within the planning system, making it mandatory for new developments to include adequate recycling and waste storage and collection facilities, and enabling local authorities to enforce this;
- increase funding for food waste recycling, particularly in flatted properties;
- clarify and improve local authorities' powers to enforce against residents who persistently contaminate their recycling or present their waste and recycling incorrectly; and
- extend local authorities' enforcement powers to enable them to act against landlords or managing agents at properties with communal bins.

We would like to see businesses, particularly supermarkets, following the German model and collecting packaging waste for recycling in-store.

At a London level, we welcome the LES' recommendation that private sector landlords should be compelled to comply with the guidance document we produced with Resource London, 'Waste Management Planning Advice for New Flatted Properties.'<sup>7</sup> We welcome the LES' focus on improving commercial waste data, and would welcome greater transparency over that data to assist in meeting the 50% recycling target. We note that if the collection of all municipal waste was brought within the remit of local authorities, they could be in a position to manage and meet the 65% target, as well as securing a new potential revenue stream.

LEDNet members offer to support progressive and innovation action by:

- supporting research on how to engage with people who are uninterested in recycling and properties that are hard to reach;
- advocating for revised design codes being prepared under the new London Plan to ensure provision of adequate recycling and waste storage and collection facilities;
- increasing the simplicity and consistency of communications around household recycling and waste collection;
- trialling high quality on-the-go recycling facilities; and
- increasing participation in food waste recycling.

## Creating the right infrastructure

Resources and waste infrastructure encompasses everything from reuse facilities, recycling facilities in homes and on the go, to reprocessing facilities and waste treatment. This infrastructure should be multifunctional, flexible and smart, such that it can support reuse, recycling, waste disposal and energy from waste capacity as part of a single system that supports the circular economy. We would not be supportive of taxation linked to disposal by way of energy from waste (incineration), as this simply adds unavoidable cost to waste disposal.

London needs to plan for these facilities – and the land they require – as a city, and as LEDNet we offer to work collaboratively with WDAs, the South London Waste Partnership and the GLA to improve the efficacy of London's waste disposal arrangements.

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<sup>7</sup> 2017, LEDNet and LWARB, 'Waste Management Planning Advice for New Flatted Properties', <https://www.londoncouncils.gov.uk/our-key-themes/environment/london-environment-directors-network>

## LEDNet resources and waste position: detailed asks and offers

Area	Position	Lead	Action required
<b>Driving progressive action</b>	Develop national performance metrics for resources and waste that include measures of residual waste reduction and those that capture all material that is reused or recycled	National government	Inclusion of metrics in 2018 Resources and Waste Strategy
	Work together towards a common vision for delivery of London's resources and waste objectives, based on a clear implementation plan and adequate financial resources	LEDNet, GLA, LWARB	Develop a shared vision and implementation plan
	Support greater collaboration between LEDNet members on shared resources and waste services	LEDNet, LWARB	Identify opportunities for shared services and facilitate learning between boroughs
<b>Communications and behaviour change</b>	Fund and support national behaviour change campaigns that reduce waste, increase reuse and recycling and reduce littering and fly-tipping	National government	Inclusion of behaviour change campaigns and funding for them in 2018 Resources and Waste Strategy
	Increase support for effective London-wide behaviour change campaigns, like Recycle for London, to drive reuse and recycling in the context of London's highly varied and transient population	LEDNet, GLA, LWARB	Identify where behaviour change campaigns can be tested and scaled up across London
	Identify and scale-up effective behaviour-led approaches to tackling fly-tipping	LEDNet, Keep Britain Tidy	Trial behaviour-led interventions to tackle fly-tipping
	Increase the simplicity and consistency of communications around household recycling and waste collection services	LEDNet, LWARB, WRAP	Work together to support Recycle for London and consistent communications around the minimum recycling offer
<b>Minimising waste</b>	Ban and phase out the use of non-recyclable materials	National government	Inclusion in 2018 Resources and Waste Strategy, and subsequent legislation
	Regulate to reduce the number of plastics that can be used in products and packaging	National government	Inclusion in 2018 Resources and Waste Strategy, and subsequent legislative support
	Use fiscal measures to disincentivise single-use products and packaging and built-in redundancy	National government	Inclusion in 2018 Resources and Waste Strategy and the 2018 Autumn Budget
	Ensure the extended producer responsibility system is based on the polluter pays principle, secures the necessary financial resources to deal with the whole life costs of products and packaging, addresses the recyclability of products and supports the market for recycled materials	National government	Inclusion in 2018 Resources and Waste Strategy, and subsequent legislation
	Commit to the highest design standards, which reduce waste, extend useable	Businesses	Support industry innovation and best

	product life, incorporate high levels of recycled materials, and ensure recyclability		practice
	Establish and take part in local business responsibility schemes, which support waste reduction in the local economy, including through local taxation	LEDNet, local businesses	London-based pilot projects
	Ensure that waste collection systems effectively reduce residual waste, including through restriction of residual waste collections	LEDNet, LWARB	London-based pilot projects
	Reduce waste in-house, including single use plastics	National government, LEDNet, businesses	Commit to and report on internal waste minimisation targets
<b>Reuse</b>	Pilot innovative reuse schemes, including 'product as a service' approaches	LEDNet	London-based pilot projects
	Trial programmes that can support local reuse and repair businesses, working with local authority waste teams	LEDNet, LWARB	Provide tailored support for reuse and repair businesses
<b>Recycling</b>	Ensure mandatory use of clear, consistent on-pack recycling labelling	National government	Inclusion in 2018 Resources and Waste Strategy
	Incentivise recycling through deposit return schemes, whilst ensuring that they complement current recycling systems	National government, local government	Inclusion in 2018 Resources and Waste Strategy
	Permit local authorities to include tonnages of IBA, where is reused/ recycled into secondary aggregates, in recycling figures	National government	Issue guidance to support inclusion of IBA in tonnages
	Ensure that the National Planning Policy Framework (NPPF) and the London Plan support mandatory provision of adequate recycling and waste storage and collection facilities in all new developments	National government, GLA	Include in the NPPF and new draft London Plan
	Amend the Town and Country Planning (General Permitted Development) Order to include 'waste storage and collection arrangements' under the conditions for Class O2 properties	National government	Amend the Town and Country Planning (General Permitted Development) Order
	Develop shared understanding of the role and requirements of recycling and waste in the planning system	LEDNet, LWARB	Develop joint workshops for planning and waste officers
	Increase funding for food waste recycling, particularly in flatted properties	National government, GLA	Increase funding streams available to local authorities
	Enable local authorities and WDAs to support the waste targets within the LES by supporting increased commercial (and therefore municipal) recycling	GLA	Support councils to deliver commercial waste services where appropriate
	Explore improved commercial recycling offers from councils	LEDNet	Facilitate learning and best practice amongst members
	Repeal the changes to Section 46 of the Environmental Protection Act 1990 introduced by section 58 and schedule 12 of the Deregulation Act 2015	National government	Amend the Deregulation Act 2015
	Expand the powers available under Section 46 of the Environmental Protection Act 1990 to enable waste authorities to serve a s46 notice on the landlords and managing agents of properties where communal-use containers are deployed	National government	Inclusion in 2018 Resources and Waste Strategy
	Address landlords' responsibility for supporting appropriate recycling and waste	National	Consider amending landlord licensing

	management in their properties	government, LEDNet	schemes to include requirements to provide adequate waste storage and facilities in accordance with LEDNet and Resource London guidance <sup>8</sup>
	Increase efficacy of enforcement through better training on contamination for collection crews	LEDNet, LWARB	Action by LEDNet members
	Collect packaging waste for reuse or recycling in-store	Businesses	Local producer responsibility systems established for businesses to collect packaging for reuse or recycling
	Support research that aims to engage people that are uninterested in recycling and properties that are hard to reach	LEDNet, LWARB	Identify research-led schemes that can effectively address these issues
	Advocate for revised design codes being prepared under the new London Plan to ensure provision of adequate recycling and waste collection and storage facilities in applications for retrofitting of residential or business developments	LEDNet	Advocate for inclusion of waste requirements in local authority design codes
	Trial high quality on-the-go recycling facilities	LEDNet, LWARB, GLA	Trial facilities for achieving high quality on-the-go recycling
	Increase participation in food waste recycling	LEDNet, LWARB	Support methods for increasing food waste participation
<b>Infrastructure</b>	Improve the efficacy of London's waste disposal arrangements	LEDNet, GLA, WDAs, South London Waste Partnership	Lead a review of disposal arrangements

<sup>8</sup> 2017, Resource London and LEDNet, *Guide to improving waste management in the domestic rented sector*

## Annex I: What is LEDNet?

LEDNet is the membership association for London's Environment Directors. Together, they develop research, trial new interventions and undertake policy advocacy at a regional and national level, to achieve enhanced environmental outcomes, increase adoption of best practice and successful innovation, and deliver more cost effective outcomes for London residents.

Waste management is a core concern for LEDNet members, who together manage 5.5 million tonnes of waste every year, including over 2 million tonnes of reused, recycling or composted material.<sup>9</sup> This comprises 20% of England's total waste, and just under 20% of England's total recycling.<sup>10</sup> LWARB estimate that the circular economy could provide London with net benefits of £7 million/ year and 40,000 new jobs.<sup>11</sup>

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<sup>9</sup> Defra, 2017, 'Local Authority Collected Waste Statistics - Local Authority data', <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>.

<sup>10</sup> Ibid.

<sup>11</sup> LWARB, 2017, *Circular Economy Route Map*, <https://www.lwarb.gov.uk/what-we-do/circular-london/circular-economy-route-map/>.