

Essex County Council's Submission to the Select Committee – Waste Reduction

1.0 Summary:

- 1.1 It is the view of Essex County Council that if there is to be a true commitment to the waste hierarchy which clearly places reduction and reuse above recycling, then there must be a much greater public and industry focus on waste prevention and minimisation over the long term.
- 1.2 Adoption of waste prevention and minimisation activities by the public is in the main low as generally these activities are, from the public perspective, time consuming, out of their control and require significant changes in lifestyle which are often seen as reducing the quality of their life (i.e. having to go without). As a result of the viewpoint of the public it is often difficult for local authorities to significantly influence behaviour particularly when most activity is focused on enabling and encouraging.
- 1.3 Adoption of waste prevention and minimisation activities by industry seems to vary greatly; taking place only where a clear financial or competitive advantage can be demonstrated.
- 1.4 If waste management is going to shift significantly up the waste hierarchy then a more interventionist approach is required to tackle the issues at source, primarily focusing on producers, manufacturers and retailers. This should focus on all stages along the product supply chain to ensure waste generation is minimised at the design/manufacture phase of products and greater steps are taken to remove the use of unnecessary packaging.
- 1.5 With regard to the public the issue of reduction and reuse needs to be escalated at a national level. Public awareness of the issues, problems, opportunities and costs needs to be raised as a way of stimulating individual action. The ultimate goal should be that generating high levels of waste is seen as socially unacceptable behaviour and taking active steps to reduce waste is normalised. For this goal to be achieved it is likely that even after tackling waste at source and 'pricking' social conscience further actions will need to be taken of a punitive nature. We would support any activities which provided greater information to the consumer on the environmental impact of their purchasing choices and would highlight the success of energy efficiency labelling on electrical goods as a model which could be replicated for wasteful products.
- 1.6 Making changes to the current pricing framework for household waste to allow for variable charging for household waste will enable local authorities to take the ultimate actions against those generating excessive waste; this approach will also fully embrace the polluter pays principle. This approach is prevalent in the water, gas and electricity industries and Essex believes

that the option to introduce direct financial linkages for waste need to be available to local authorities.

- 1.7 Charging for waste in this manner has focused the attention of commercial organisations to reduce waste and there is no reason to doubt a similar effect will be seen on domestic waste providing all steps are taken to enable householders to prevent and minimise waste (e.g. through home composting) and maximise recycling prior to introducing punitive measures.

2.0 Better Design and Use of Materials

2.1 What role can better design and material play in minimising the creation of waste?

- 2.1.1 If waste reduction is going to be effectively tackled it is essential that there is a shift away from end of pipe solutions. The public generally feel that waste avoidance is out of their control as products are not designed with waste avoidance as a primary focus. The over use of packaging and the disposable nature of many products results in high levels of waste which the public feel is an inevitable result of consumerism.
- 2.1.2 Opportunities to 'design-out' waste within the end products as well as within manufacturing process must be taken by designers and manufacturers if overall waste arisings are to be reduced. This will require a shift in mindset for manufacturers as well as support.
- 2.1.3 The work of WRAP within the area of supporting manufacturers and retail buyers must continue. The work being undertaken by WRAP to promote the use of alternative materials and the light-weighting of packaging has started to have an impact within the industry. This work needs to be expanded and promoted more widely. The promotion of actions taken by manufacturers and or retailers can then form part of the purchasing decision made by the public.
- 2.1.4 Great strides have been made to reduce the quantity of collected waste through the introduction and promotion of home composting as a waste reduction tool. Since 2000 Essex has distributed and supported the use of over 95, 000 compost bins (in partnership with WRAP from 2005). The use of bins by almost a fifth of Essex households has undoubtedly reduced the quantity of material collected by Essex waste authorities. This at source treatment of waste provides a ready opportunity for manufacturers to focus on the use of biodegradable packaging/materials which can readily be disposed of within home composting units.

- 2.1.5 Essex County Council is taking a lead in addressing the challenges around production of waste created by development pressures in the region. Policies and guidance are in place which will influence the design process to take account of the waste arising from developments.

The Urban Place Supplement (UPS), a companion document to the Essex Design Guide which provides guidance on the layout and design of housing and mixed use development, sets out criteria for new development that will minimise waste reduce pollution and promotes sustainable construction. The UPS challenges designers to:

- have regard to the reuse of materials that may already exist on site
- consider the advantages of off site pre assembled, prefabricated or standard sized components, which can reduce the amount waste produced during the construction process
- choose materials which have good weathering properties that are durable and capable of being recycled. This will thus minimising waste during the life time of the building
- Designing deconstruction into properties enable further reuse of materials.

These principle factors are equally transferable to the manufacture/retail sector.

- 2.1.6 The requirement for some developers to have Site Waste Plans has played a major role in increasing knowledge within the construction industry. This should be extended to ensure waste reduction in terms of the choice of materials is also factored into the design of such developments.

2.2 Can better designed products offset the increase in consumption?

- 2.2.1 Improvements to the design of products can undoubtedly lead to a reduction in consumption by the public particularly when design improvements are coupled with increased durability and reusability. However for impact to be maximised this approach needs to be undertaken in a climate of increased awareness and public consciousness so that there is a direct link between the waste reduction design elements of a product and the purchasing decisions of the consumer.
- 2.2.2 Greater availability of information to the public on the material efficiency of products (through a similar eco-labeling approach as that adopted for product energy usage) when coupled with the normalisation of waste

reduction/prevention will assist the public in making informed purchasing choices.

- 2.2.3 In targeting the end product it should not be ignored that significant levels of resource consumption take place in the development and manufacture of products and therefore improvements to the design of products must be extended to the manufacturing process. The impact of increasing material resource efficiency within the manufacture of products will have a much greater impact on total waste arisings within the UK than focusing solely on the end product.
- 2.2.4 The activities of Envirowise, WRAP and the National Industrial Symbiosis Programme (NISP) have introduced the concept of resource efficiency and co-operation between differing business sectors as a means of improving performance and reducing consumption by businesses. These activities must be continued to ensure that the concept of waste reduction and increased resource efficiency become central to the ethos of manufactures. This concept has been extended on a regional and local scale with both the public and SMEs through the promotion of waste exchanges.

2.3 Are there any gaps in knowledge and how are they being addressed?

- 2.3.1 Essex has had some experience in this area in relation to the promotion of the ethos of the UPS. This has demonstrated that in a rapidly changing physical and policy environment everyone is on a steep learning curve including those in the development industry and local authorities.
- 2.3.2 The Essex Design Initiative learning programme aims to disseminate information, increase the knowledge and skills to developers/agents/local authority planners around the issues contained within the UPS. Included in this programme there are seminars which address waste management and minimisation. It is however a challenge to capture the small builder carrying out small scale development [less than 10 units] which accounts for 87% of the planning applications in Essex for new housing, however these developments only account for about 1% of new housing stock.

3.0 Business Framework

- 3.1 **Does the current policy, regulatory and legal framework support and incentivise the development of better, more sustainable products and processes? How is the framework communicated to businesses and what is the level of awareness and understanding among businesses?**

- 3.1.1 The producer responsibility regulatory framework has gone some way in focusing the manufacturing and retail sector on producing and specifying more sustainable products and improved processes which minimise waste arisings. Essex would support an approach which increases the scope of producer responsibility to other products and allows for organisations to meet their obligations through the sale/design of reusability, longevity and upgradability into products.
- 3.1.2 The key legislative tool available to local government to tackle excessive waste resulting from products placed on the market is The Packaging (Essential Requirements) Regulations 2003. This does enable Trading Standards (Weights and Measures Authorities) to take action against those that place on the market goods which use excessive packaging. Although supportive of this legislation the low number of successful actions taken against those responsible for putting over-packaged products on the market highlights the inherent difficulty in applying these regulations. Essex would wish to see a simplification of these regulations to enable greater applicability and the extension for enforcement to the Environment Agency. This would enable a much greater use of the regulations against national and international manufacturers.
- 3.1.3 Current national policies and regulations support the development of sustainable solutions but generally central government legislation does not demand the use of sustainable products, for example, the Governments Code for Sustainable Homes that sets the minimum standard for the environmental impact of materials in house building requires elements of construction to meet the BRE Green Guide 2006 rating of at least D, however Code compliance is currently voluntary. It is instead left to individual authorities, agencies, landowners, clients to require the use of more sustainable products/processes.
- 3.1.4 The number of enquires handled by Essex County Council would seem to indicate that the level of understanding, particularly amongst small and medium sized enterprises, is low. It is essential that all business sectors understand and adopt the necessary measures to ensure legal compliance and the adoption of good practice.

3.2 What other measures can promote a focus on waste reduction among business?

- 3.2.1 In addition to the use of punitive fiscal and/or legislative measures the key aspect which will encourage the adoption of waste reduction measures by business is if this can be demonstrated to improve efficiency or provide a competitive advantage.
- 3.2.2 The role of Envirowise and NISP and similar local/regional agencies have positively impacted on the way in which business use material resources

providing them with the opportunity to reduce costs, increase efficiency and thus allowing them to compete more effectively within the market place. The work of such organisations must therefore be encouraged and allowed to continue.

- 3.2.3 The opportunities for business to have a competitive advantage through improved resource efficiency can also be driven by public expectations. If the inefficient use of resources is seen as socially unacceptable by the general public then those organisations that can demonstrate a good track record in this area will have greater opportunity to prosper.

4 Government Policy

4.1 What is and should be the role of Government in addressing the issues of waste reduction?

- 4.1.1 If waste management is going to shift significantly up the waste hierarchy then there needs to be an increased Government focus on waste reduction. Essex CC feels that a more interventionist approach is required to tackle the issues at source, primarily focusing on producers, manufacturers and retailers. This should focus on all stages along the product supply chain to ensure waste generation is minimised at the design/manufacture phase of products and greater steps are taken to remove the use of unnecessary packaging.
- 4.1.2 Government intervention can take a number of forms including the use of punitive measures. These could take the form of an extension producer responsibility regulation to tackle single use/disposable items such as razors, cameras or nappies where a reusable or longer lived alternative exists, thus ensuring the true cost of these items is reflected in the retail price. A greater requirement for repairability/upgradability to be designed into products or the introduction of a minimum lifespan/warranty period for products could be introduced.
- 4.1.3 Government also needs to take a lead in demonstrating what can be achieved to reduce waste by putting waste reduction into practice within its own operations. The adoption of Government departmental targets for waste reduction along side those for recycling should be adopted to demonstrate real commitment to the waste hierarchy.
- 4.1.4 It is only once active measures have been taken to design waste out of products that either national or local government can expect the public to adopt greater waste avoidance within the home. Despite the almost universal acceptance and understanding of the need to recycle there still seems to be widespread ignorance amongst the public with regard to the concept of waste reduction or the need to take personal responsibility.

- 4.1.5 A key role of Government needs to be to develop and fund an overarching national waste prevention message over a long period. Such a message must tap into the public consciousness and make use of the drivers which influence public behaviour in this area, many of which may not be associated with environmental concerns. As with all campaigns aimed at changing behaviour it is essential that these are carried out over an extended period and properly resourced. WRAP have demonstrated significant success in developing the national recycling campaign which has been almost universally adopted by local authorities.
- 4.1.6 In raising the public understanding and acceptance of waste reduction it is essential that Government takes the necessary actions to enable the public to make informed choices. This could take the form of extending the eco-labelling approach to highlight the efficiency of products with regard to the use of material within the final product and during the manufacture. Such an approach has clearly resulted in an increase in the uptake of energy efficient products and there is no reason to assume this could not be replicated for waste reduction.
- 4.1.7 Although the role of reuse is often seen as delaying the entry of material into the waste stream and therefore not true reduction, its role in waste management and the wider social benefits should not be ignored. The third sector play an active role in the provision of reuse activities resulting in significant social and economic spin off benefits. A requirement to incorporate repairability into the design of products would stimulate this area of activity.
- 4.1.8 The use of punitive measures targeted at the public disposing of waste can only be used once reasonable effort has been taken to 'design-out' inefficient material use in products, provide the public with alternative purchasing options. Essex County Council supports the recent consultation on the introduction of measures to enable Waste Authorities to operate differential charging mechanisms for waste collection and disposal. It is however the view of Essex that for this to work effectively there must be the flexibility for waste to be treated like utility and that charges must be set at a level to influence behaviour.

5 Consumer Behaviour

5.1 How can better design be used to effect a change in consumption patterns and behaviour?

- 5.1.1 Better design and the use of materials without fiscal measures or actions which limit consumer choice will only influence consumer behaviour if there is a public groundswell against inefficient use of materials. As previously stated the ultimate goal should be to ensure high waste

generation whether it is by the public or manufacturers is seen as socially unacceptable. This will only be achieved through an effective, continuous and high profile national public awareness campaign.

- 5.1.2 A shift in public opinion against inefficient resource use and high levels of waste generation together with improved product information on resource efficiency will assist in shifting public consumption patterns. This will be further enhanced when coupled with fiscal measures such as those detailed previously.

5.2 Are there any gaps in this area?

- 5.2.1 Significant gaps exist in knowledge relating to the impact of socio-demographics on consumption and therefore the triggers which influence purchasing choices and behavioural shift. If waste reduction is to be achieved successfully the ideal approach is that this is driven through public demand rather than fiscal or legislation, although these have a part to play. Such a shift in public opinion can only be achieved through a true understanding of what motivates the public to minimise waste.

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