



Local Authority Recycling Advisory Committee

Consultation Response - Lords Science and Technology Select Committee - Sustainable approaches to waste reduction.

I am writing to present the LARAC response to the sustainable approaches to waste reduction Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC recognises that its members do not have a direct influence over product design, industrial production and supply chain management, however the membership wishes to promote better integration between all organizations and sectors whose activities bear on the management of materials and energy within the economy. This particularly applies to the formation of public perceptions about the importance of waste reduction, which in turn will influence both political priorities and consumer choices. Local authorities have an important part to play in bringing about the required cultural changes. They should be engaged, encouraged and adequately resourced to exert community leadership through waste awareness and education programmes.

LARAC would put forward the following comments relating to the better design and use of materials:

- Designing for better durability Measures that encourage the design of more durable products could include tax incentives for operations that repair or renovate products (e.g. VAT concessions) and more comprehensive producer liabilities for end-of-life products.
- Designing for re-manufacture Design for ease of identification, construction and replacement of parts would militate towards re-manufacture being a viable option for a wider range of products. Restrictive practices such as requiring or encouraging only the use of branded components should be discouraged.

- Designing less wasteful packaging Public perception is that packaging creates waste. Whilst this is not always true, a comprehensive review of consumer packaging will, we believe, considerably reduce waste. We would encourage designs that reduce and simplify packaging (avoiding the use of more than one material), militating away from packaging whose principal function is better promotion of the product and towards packaging whose principal function is appropriate protection and efficient transportation of the product. "Lightweighting" of packaging is to be promoted, giving environmental and cost benefits both in the reduction of material used and in terms of energy to transport the materials, but not necessarily through transferring from one material to another. For example an independent Life cycle Analysis (LCA) should be used to determine whether (easily recyclable) glass packaging should be replaced by lighter weight but more complex plastic packaging.
- Designing for more use of secondary materials Designing products so that recycled materials can be more readily incorporated will reduce the demand for virgin resources and therefore reduce waste. This move would also close the recycling loop and would encourage the development of the UK's reprocessing infrastructure. Increasing taxes on carbon and environmentally damaging virgin materials (such as aggregates or peat) would promote both the more efficient use of raw materials and development of standards based on "fit for purpose" criteria that promote the use of secondary materials when appropriate.
- Simplifying design It is important that the move to reduce the amount of waste or material used in the development of the product is not at the expense of the possibility for reuse and recycling at the end of life. For example, the use of composite materials may enable waste at the point of production to be minimised but may increase the waste generated at the point of disposal. It is essential that a full lifecycle analysis (LCA) is carried out on any proposals to ensure that there is a net environmental benefit.
- Design for recycling, not disposal Although recycling is not synonymous with waste reduction, LARAC believes that policies that tax "end of pipe" solutions to resources management will promote both waste avoidance and recycling. A number of financial instruments may be available to achieve this, from increasing landfill tax to taxing carbon. Measures encouraging greater energy efficiency will help, but decisions must be made on the basis of whole product lifecycles, including winning the raw materials and disposing of the end products - not just the assembly or manufacture of the product.

12th October 2007