London Waste Action - consultation on managing London's waste.

Report of responses from the online consultation and stakeholder workshop

prepared by

Final Report - March 2007

This page intentionally blank

London Waste Action - consultation on managing London's waste

Report of responses from the online consultation and stakeholder workshop

Produced by Dialogue by Design, independent facilitators of the online consultation for London Waste Action

Dialogue by Design

Ambassador House

Brigstock Road

Thornton Heath

Surrey

CR7 7JG

T: 020 8683 6602

E: facilitators@dialoguebydesign.com

W: www.dialoguebydesign.com

EXECUTIVE SUMMARY

London Waste Action commissioned Dialogue by Design to run an online consultation and key stakeholder workshop on the management of waste in London, primarily focused on wider wastes (non-municipal wastes). Around 200 people took part, representing the main sectors and waste types, with high participation online from companies and first time contributors.

The need for **more sustainable waste management** and **greater self sufficiency** for London was generally accepted, to **reduce negative impacts** from waste **transport and disposal** and make **better use of resources**. **Wider wastes,** especially Commercial and Industrial, were seen as a **high priority** due to the much larger quantities, and a relative lack of focus compared to municipal waste. A clear message was the need for **leadership, vision and a coordinated strategy, with implementation plans** to reduce uncertainty and provide a framework for all sectors to contribute. This **comprehensive approach** needs measures **to motivate, enable, incentivise and require change**, targeting waste creation as well as its management, and should be underpinned by **better data**.

Making it cheaper and /or compulsory would most likely drive change, especially further **increasing the cost differential** between residual disposal and minimisation, reuse and recycling, (e.g. variable charging, higher landfill tax, tradable recycling credits) and **lowering the cost of recycled products** (e.g. zero VAT or short term subsidies). **Compulsion** (e.g. waste disposal quotas, minimum content of recycled materials in products/processes, green procurement targets) should be **offset by incentives** to protect business and encourage compliance. The aim must be **sustainable market transformation** to deliver waste minimisation in product/process design, the development of collection and reprocessing infrastructure.

Making it easier through **better services** and **better information** would also be an effective driver for waste producers. Business wants more comprehensive, cost effective recycling services, targeted at major waste arisings such as food and paper/card, and tailored to business type e.g. food retailers, offices. **SMEs need special attention** such as **collection services** by **local authorities** for wastes similar to domestic, or partnerships with larger companies. **Local Authorities need to be more involved** with wider wastes either as facilitators, regulators or service providers, with or without additional powers. **Practical information** on how change may be achieved (e.g. options and costs) was seen as **more motivating than education** on why change matters, although education may help foster acceptance of the need for sites/facilities.

An **urgent need for more sites and reprocessing facilities**, including wharf transfer stations, emerged. **Options for siting facilities exist** (e.g. on brownfield, waste land, empty commercial property, on existing businesses' property, and in new developments and residential areas). But **strategic planning is needed to identify suitable sites, uses and scale** and to facilitate a shift to rail and water transport, **in consultation** with the waste industry and local communities, whose needs often conflict. **Acceptability can be increased** by more attractive sites with fuller services, meeting safety concerns and local needs e.g. employment or Combined Heat and Power for social housing. **Progress on land-use planning** needs more specialist waste planners. **Development support** should reduce the cost and time to get permissions and licenses and incentivise industry investment e.g. through capital grants or rates rebates. **Many favoured thermal treatment** for dealing with residual wastes, with provisos of first maximising reduction, reuse and recycling, and of choosing the appropriate scale, technology and location. This may reflect a shift in attitudes and needs **further work to agree the role of Energy from Waste**. Decisions are also needed on **whether the market or policy will drive choices** for collections, sites and technologies. Different priorities e.g. reducing transport, economies of scale, maximising renewable energy or recycling, can lead to different choices (e.g. between large or small EfW facilities, or whether to target paper/card as 70% of Commercial and Industrial waste).

In conclusion, **more effective management** is needed of the interplay between a waste strategy for London, the market economy, enabling mechanisms, the planning process, site availability and public perception. **An appropriate body should lead this work now**, even if a strategic authority is set up, to **better use existing facilities and operators** and **find creative ways to lever change** based on existing GLA and Borough powers and influence e.g. planning and competence powers, improving their own waste management and green purchasing, voluntary agreements with companies, investment support, and lobbying Central Government on its impact on London in terms of waste production and policies.

PART ONE:

ONLINE CONSULTATION ON MANAGING LONDON'S WASTE

Background

London Waste Action (LWA) asked Dialogue by Design to run a consultation process to get stakeholders views on current deficiencies in the management of wider wastes in London. Wider waste was defined as all wastes except municipal. This focus became more flexible during the consultation process as some participants also wanted to contribute views on municipal waste.

The objectives of consultation process were:

- To enable a coordinated input from LWA stakeholders in to the Greater London Authority's wider waste strategy as it develops
- To help LWA input into the Waste Alteration to the London Plan (the Mayor's planning strategy for the development of London)

Over 300 individual stakeholders were invited by letter, and London Remade sent an e-mail invitation to the recipients of their e-newsletter (which is sent to approximately 6000 people) with a link to the consultation website. The consultation ran from 21st November 2005 to 27th January 2006. During this time 438 people registered to participate and 174 submitted responses to the questions online. The participants were a mix of the main stakeholders in terms of sector and waste type (see appendix 1 for a list of participants). 3 participants submitted responses which did not fit the structure of the consultation questions, these responses are in appendix 2. In addition to the online consultation, several stakeholders were contacted and invited to participate by telephone interview. The list of those participating in this way is in appendix 3

Results and this report

A range of consultees took part in the online consultation (waste and recycling organisations, public, private and community sectors, whose activities include construction, demolition and development manufacturing and retailing, hotels, pubs and conference centres and health care. People responded as householders and decision makers or staff in businesses (large and SME). The telephone interviews were carried out subsequently to address gaps in sectors represented.

Each consultee responded from their own sector's need and also tried to look at broader picture. The results therefore cover many perspectives. But this was not intended as a representative quantitative sample of London stakeholders. So while responses to each question have been grouped under summary headings, the results should not be interpreted on a purely statistical basis. The groupings are useful indicators of where commonality was found. Taken in relation to each other they help to clarify the range of measures needed to address the multiplicity of stakeholders needs and where general agreement or specific differences exist. In this way they indicate areas for action, and those where further development and dialogue are needed.

The report has been compiled by independent process specialists from Dialogue by Design and does not necessarily express the views of London Waste Action.

RESULTS

A. KEY ISSUES FOR WASTE MANAGEMENT IN LONDON

This was an open question and many different issues were raised, most of which were returned to in the following more specific questions. There was **general acceptance of** the need for more **sustainable waste management** in London based on the 4 R's (Reduce, Reuse, Recycle, Recover) and **recognition of huge potential** for improvement.

Responses indicated that the key issues were **making it easier and more attractive** for waste producers and waste processors to **minimise waste** and the associated impacts, especially **resource use** and **transport impacts**. More **comprehensive and consistent services** across London combined with **education and financial and legal incentives** were seen as the key to achieving change, particularly for **commercial and industrial** waste where more potential and need was identified. Those with knowledge of waste management stressed the critical need for a huge **increase in sites** for reprocessing and treating waste within London to enable the necessary **growth in capacity**. **Planning** was seen as a key tool for developing sites and the switch to more **sustainable transport modes** such as water and rail.

Table 1 - Which issues do you think are most important with regards to waste management in London?

Group heading	Number of comments placed in group
Need for consistent and more collection schemes	42
Waste minimisation	30
Transport and proximity principle	30
Provision of sites in London	27
Educate and incentivise recycling	24
Dealing with commercial and industrial waste	20
Markets for recycled materials	19
Enabling recyclers and reprocessors	19
How to reduce landfill	16
Packaging	12
Access to facilities for businesses	12
Single authority or coordination for London	12
Develop thermal treatment	8
Increasing recycling	8
Composting and food waste	7
Fly tipping	7
Innovative technology	7
Real costs	7
Construction and demolition waste	6
Environmental and public health	6
Litter	5
Penalise non compliance	5
Export of waste materials	4
WEEE	4
Markets for recyclates	4
Definition of waste	3
Re-use systems	3
Regulations	3
Attracting recyclers and reprocessors to London	2
MSW	2
Closed loop recycling	2
Support the voluntary sector	2
Variable pricing for municipal waste	1
Water	1
Promoting behaviour change	1
General observation	1

B - REDUCING DEPENDENCE ON LANDFILL

There was **general acceptance** of the need to reduce dependence on landfill and for London to manage its waste more sustainably. Overall consultees emphasised the need for a **combination of motivating, enabling, incentivising and requiring the desired shift**, through a comprehensive approach which addresses the **creation** as well as the **management** of waste.

Improving waste minimisation, reduction and reuse (see table 2)

Many comments stressed the need for **education** at all levels and **information** at point of purchase/disposal decision making, backed up by **targeted penalties and incentives**, both for waste producers, collectors and reprocessors. Suggestions include increasing regulation and enforcement e.g. planning conditions on developers for waste generated and to design for sustainable waste management by building occupants) , increasing disposal costs or using variable charging, and tradeable waste permits.

Consistent and more accessible collection services were seen by many as a key incentive to action especially for **SMEs** who should have access to **local authority services** rather than big commercial operators. Some specifically mentioned the need for a strategic authority, with more seeing a need for **coordination and strategic direction,** however delivered, to facilitate private, public and community sectors to work in **partnership**. **Reuse projects** were seen to be a niche strength of the **voluntary sector** which should be supported in this vital role, although civic amenity sites could also improve their image and services e.g. facilitate more reuse of items such as furniture, and present themselves as resource recovery centres.

People tended to relate waste minimisation largely to the need to reduce **packaging** (e.g. tax or ban plastic carrier bags, legislate for less non reusable/recyclable packaging). Increased reduction and reuse were related to reuse projects and developing **markets for recycled products**, better product **design** (reusable, upgradeable, longer lasting), and **pre-treatment methods** like compacting. Other supporting measures mentioned were learning from good practice, investment in new reprocessing technologies, a database of waste streams generated, and removing unnecessary barriers to reuse e.g. specifications.

Table 2 - How can London improve waste minimisation, reduction and reuse, so that it can be a leader?

Group heading	Number of comments placed in group
Education, penalties and incentives	66
Consistent collection system and messages	27
Address packaging issues	23
Invest in new reprocessing technology	19
Need to legislate and regulate	13
Creating a market for recycled materials	12
Support reuse projects	9
Partnership working	8
Learn from and develop good practice	8
Support SMEs	8
Recognise funding and costs	6
Improve infrastructure	6
Support voluntary sector	5
Need for a single waste authority	5
Increase disposal cost to public and businesses	4
Address through the planning process	4
Creating a market for recyclate	3
LAs should collect from business	3
Design	3
Green procurement policies	3
Refer to earlier question	2
Make recycling more visible	2
Develop Green business parks	2

Set higher recycling targets	1
Apply proximity principle	1
Provide single source of information	1
Tradable permits for waste	1
Implement WEEE	1
Allow businesses to set up their own schemes	1

Improving recycling and composting (see table 3)

Responses were similar to those for waste minimisation with many comments on the importance of **education, penalties and incentives**, but this time with more equal numbers of comments emphasising the need for **improved, simple and more standardised collection services** especially for business, where it would help avoid potential negative impacts from greater control/penalties, such as increased illegal disposal.

Responses with more detailed knowledge saw the need to **target measures** according to business or housing type and other variables irrespective of WCA's. For example householders might be motivated by knowing how their materials have been recycled: food retailers and offices would need different tailor made recycling services. In general **businesses (especially SMEs)** were seen to need more **direct contact and practical support** such as advisors, help lines, green business parks. The waste management industry would need support and coordination to develop a full range of targeted services. **Local authorities** could be more involved where commercial waste resembled municipal either as collectors or regulators. Barriers to address include procurement processes that exclude local SME service providers because of the aggregation of all services into one big contract.

There was more support for **separating waste at source** than for mixed collections, based on the need to **ensure high grade materials for reprocessing** to encourage market development, and fears that mixed collections could give the wrong signals about resource use. Mixed collections were favoured by those wanting to carry out large scale/bulk recovery and could help reduce transport. Trials to demonstrate potential were useful (e.g. 'in-office' collections of recyclable snack food packaging). Separating wet and dry recyclables was generally seen as desirable. **Community and home composting** were identified as potential major contributors to reducing landfill. Some consultees wanted to see **more alternative uses** developed (e.g. chip & scatter wood in parks, compost saw dust, mixing cement bound soil stabilisers with excavated material, flat roofs)

Table 3 - How can London improve recycling and composting?

Group heading	Number of comments placed in group
Education, penalties and incentives	37
Improve collection facilities	29
Make collection systems available to businesses	23
Keep waste types separate	23
Community composting facilities	20
Create markets for materials	17
Localised collection and processing	13
A coordinated approach	10
Realistic charging	10
Investment in infrastructure	8
Home composting	7
Make collection systems simple	7
Collection of food waste	6
Address planning barriers	5
Focus on business	5
Collect mixed waste	4
Refer to earlier question	4
Develop new technologies	4
Use in-vessel systems	4
Out of London processing	3

Focus on reuse and reduction	3
Labelling systems	2
Aggregate recycling	2
Allow the market to decide	2
Anaerobic methods	1
Deal with packaging	1
League tables	1

Dealing with residual waste (see table 4)

The large majority of comments supported **thermal treatment with heat and power recovery** of residual waste, with the caveat of the need to maximise waste minimisation, reuse, and recycling so that the scale of thermal facilities is minimised. Anaerobic digestion and MBT plants were cited as methods of recovering further resources, with residues going to thermal treatment.

Some argued in favour of a **mix of technologies** such as CHP, pyrolysis, plasma gasification units and traditional mass burn incineration with the proviso that any facility would have to meet the highest safety standards. Others favoured **new technologies** over traditional, as these offer more benefits and are increasingly ready for commercial scale introduction.

The **location** of such facilities was clearly identified as a major issue, in terms both of gaining **local acceptance** and the need for a **strategic approach**. Heat and power recovery was seen to offer **benefits** which could offset the negative perceptions of traditional incineration, such as greater resource efficiency and cheaper fuel for low income households. **Smaller scale facilities** were seen as more acceptable, although **safety concerns** would still need to be addressed and **confidence** built in public authorities guarantees. Some felt that **education** on taking responsibility for waste, and the benefits of thermal recovery could help public acceptance.

It was generally recognised that even with moves to reduce waste and recover materials, there will be some **ongoing need for landfill**, certainly in the short to medium term. Existing landfill will last longer as residual waste is reduced. Positive **markets/uses** for inert residues included reclaiming land by the sea, shoring sea defences and landscaping, and adding to aggregates in the building industry.

Table 4 - How do you think London should deal with its residual waste?

Group heading	Number of comments placed in group
Thermal treatment / CHP	74
Landfill	17
No comment, don't understand the question	12
Increase recycling	11
Find markets and uses for some wastes	11
Developing new technology	10
Education and awareness	7
Focus on reduction	6
MBT	5
Export to other areas	3
Anaerobic digestion	3
Transport issues	3
Scale of facility	3
Aim for zero waste	2
Review options	2
More re-use	2
Aerobic digestion	1

C - LAND-USE PLANNING AND SITES

Ensuring sufficient sites for waste management facilities (see table 5)

Most interpreted this question as referring to recycling and resource recovery sites rather than landfill. It was generally felt that **a coordinated and proactive effort** was needed to **identify suitable sites** (new and existing sites). This would be led by **public bodies** responsible for land use planning and waste management, **in partnership** with the **waste industry**. It would be based on a **strategic appraisal** of what type and scale were needed, and would be **consistent with transport and energy priorities** e.g. shift to water/rail transport and renewable energy.

There were **mixed views on scale**. Some with waste management experience wanted fewer bigger sites, possibly co-located around the edge of London. However, many others argued that more smaller scale facilities, located in all boroughs, would have greater public appeal and foster community ownership. Some saw a need for a mix of large sites with collocated facilities and smaller satellite sites. There were also differing views about whether **collection systems** should drive the scale nature and location of facilities or vice versa. **Further dialogue** will be need to reconcile these differing perceptions and needs.

Planning authorities should make it easier for operators to get the necessary approvals and permits to ensure fast tracking and reduced cost for set up. Some felt that communities would have to face up to the need for sites, although proper **consultation** (with full information) was critical. Many felt that **brownfield, waste lands and empty commercial property** offered great potential for sites, as well as any **new developments** (e.g. retailer/office block) being required to include some facilities for their own and local community waste. **Financial investment** such as rates rebates or a site development fund should be considered.

Table 5 - How do you think London should ensure sufficient sites for waste management can be found and developed?

Group heading	Number of comments placed in group
Finding sites for facilities	29
Using waste land / brownfield sites	18
Make facilities a requirement for developments	16
Find sites for particular technologies	16
Financial investment	15
Scale of facility	14
Get buy in from planners	13
Get public buy in	12
Partnership working	11
Focus on reduction and recycling	11
Transport systems	9
Cross London plan for sites and strategy	8
No comment / question not clear	7
Improve existing sites	7
May need CPOs	5
Exporting waste out of London	5
Collection systems	5
Penalties	1
Research markets	1
Need for a single waste authority for London	1

D - ECONOMICS AND INFRASTRUCTURE

Creating an effective economic environment for new facilities (see table 6)

Many comments stressed the need for a mix of **financial investment and incentives for those building new facilities** such as set up grants, underwriting, loans, tax breaks. Such measures should be combined with **incentives and penalties for waste producers** (higher charges for collection of non recyclables, higher rates and fines for non separation of waste) and effective collection methods to ensure good quality consistent supply to the new facilities. Some responses indicated that private investment would most likely be released in response to a **London strategy for all wastes** with **guaranteed quantities** of recyclable/recoverable wastes to be collected, **site identification** and **planning support**. Opinions differed over **contracts.** For large scale facilities big long terms contracts were wanted. Smaller operators want the opportunity to bid for localised waste collection and separation/ treatment contracts so as to provide local jobs and keep money and other resources within the community.

Several comments felt that the **landfill tax credit** should be ploughed back into investment in new facilities, and **a landfill tax applied to commercial and industrial waste**. C&I waste was also seen to offer significant business opportunities for reprocessors, if **effective collections** could be achieved.

Another important contributor was ensuring a **secure market for recyclate** by increasing markets **for recycled materials** through stronger **specification** by all government departments and **planning conditions** for new build and refurbishment. Better **marketing of recycled products**, price incentives and the **development new products or services** from recycled materials were also mentioned as ways to stimulate market forces.

Table 6 - How can an effective economic environment for the building of new waste management facilities be created?

Group heading	Number of comments placed in group
Financial investment, incentives or penalties	40
Focus on markets for recycled materials	18
Collection and reprocessing facilities	12
Land use planning and site identification	11
Joined up policy	9
Public and private partnerships	9
Developing new technologies	6
No comment	6
Education and awareness	5
Problems of long term contracts	4
Use the private sector	4
Review the definition of waste	2
New developments must provide facilities	2
Focus on reduction	2
Refer to another question	1
Let the market drive it	1
Use landfill	1
Problems for wider waste streams	1
Reduce uncertainty for investment	1

Creating an economic environment to ensure that producers manage waste better (see table 7)

This question elicited a very clear message. A large number of points argued for **new incentives, penalties and legislation to ensure a high cost of disposal and a low (or no) cost of reuse/recycling** to the waste producer. A small number felt that this economic environment was already in place as a result of existing economic and regulatory policy.

New financial measures suggested included: variable charging, tax breaks, rates rebates, fines, higher landfill taxes (also applied to business), differential landfill charges for waste types, a more complex resource tax, tradable recycling credits, free (compulsory) waste audits with cost benefit analysis. Many with specialist knowledge argued for hypothecated revenues for use only in recycling.

New legislative measures suggested included compulsory targets for procurement of recycled goods by public and private sector, combined with measures to lower the cost of so doing. **Existing legislation** should be better enforced e.g. new landfill regulations 2005, and EU

Packaging and WEEE Directives. It was suggested that **Producer Responsibility** legislation should encourage effective life cycle assessments as part of product approval and disposal/recycling costs could be levied within the purchase price. Retailers were seen to have a special role as customers cannot avoid much waste associated with purchases. Packaging and end of life products could be returned to retailers and the original product or packaging producer given some responsibility for recycling.

Some comments cautioned against damaging business e.g. making SMEs less viable compared to large companies, and not giving enough warning of specific fiscal/legal changes to allow planning.

Table 7 - What kind of economic environment would ensure that producers would manage waste better?

Group heading	Number of comments placed in group
High cost for disposal, low cost for recycling	37
Incentives and penalties	21
Enforceable legislation	14
Education and awareness	7
Give tax breaks to recycled products	6
Address packaging issues	6
Diverse and competitive service providers	6
Encourage the investment community	5
Recycling credits	5
Tax breaks for waste reduction	5
Tough fines for fly tipping	5
Requirement to produce waste plans	5
Support improved product design	4
Public and social acceptability	3
Materials exchange projects	3
Offer companies waste audits	3
Stable revenue for collected materials	3
Retail collection systems	2
Support energy from waste	2
Space in offices for source separation	1
Binless offices	1
Require materials register	1
Offer advice to business	1
Virgin material levy	1
Corporate sponsorship of recycling facilities	1
Complicated problem with complex solutions	1
Enforce green procurement for public sector	1
Trained staff	1
Develop new technologies	1
Tax retailers	1
No comment	1

E - MARKETS FOR PRODUCTS WITH RECYCLED CONTENT

Enabling all sectors and individuals to use waste materials in manufacturing processes and to buy more recycled products (see table 8)

Roughly equal emphasis was given to the use of **fiscal incentives** (to reduce the cost of waste materials compared to virgin materials) and **education / awareness raising** including more **publicity for recycled materials.**

Fiscal incentives included tax rebates, subsidies, funding for new product development, lower VAT for recycled products and for recyclable products (if combined with measures to ensure they are recycled), and extending the present PERN system for recycling packaging materials.

Education comments referred to a range of targeted activities to raise awareness of availability (e.g. of materials and products), quality (of recycled products), opportunities (e.g. what materials can be turned into), choice (e.g. product labelling) and good practice (e.g. award/accreditation schemes). A mix of advertising, web based and other communication approaches would be needed e.g. more recycled products available as alternatives to everyday items.

From those with specialist knowledge there were recommendations to **review waste regulations** to remove barriers (e.g. de-classify recyclables as waste, differentiate between small and large companies for hazardous waste) and to encourage local use of materials (e.g. so material from demolished buildings can be reused in local construction)

Developing standards would help to demonstrate that recyclables/recycled products provide equal quality, attractiveness and fitness for purpose to non-recycled products. For products and processes the use of waste materials and purchase of recycled products should be designed at the earliest stages. This could be achieved through **specifying minimum recycled content**, especially in **public sector procurement**. Central Government and LGA should take a lead e.g. promoting re-use of materials in road schemes, use of composting in public maintained properties. **Restricting choice,** where necessary through bans, was also suggested e.g. supermarkets only offering re-useable bags or plastics bags being banned.

Improving access to recycled products and to consistent quality feedstock at more stable prices from effective **collection and reprocessing facilities** was also clearly identified need. Suggestions included proactive waste brokers, waste exchanges and online databases of waste materials.

Table 8 - What should be done to enable public, private and voluntary sector organisations and private individuals to use waste materials in manufacturing processes and to buy more recycled products

Group heading	Number of comments placed in group
Use fiscal instruments	50
Education awareness raising	38
Address waste regulations	14
Specify minimum recycled content	11
Develop standards for recycled products	11
Reprocessing and collection facilities	10
Publicise recycled materials	8
Public sector green procurement	8
Product labelling	7
Ideas on specific materials	6
Waste brokers	5
Product design	4
Research new products	3
Refer to earlier question	3
Partnerships	3
Leadership from central government	1
Ban use of certain products	1
Establish waste clubs	1
Focus on waste minimisation	1
Fit for purpose specifications	1

F - DEALING WITH ALL WASTES

Comments or recommendations for particular materials or waste streams

(see table 9)

Comments were invited for particular materials or waste streams. Most received some comment and tended to reflect the interest/experience of the consultee. However, a clear message was the need for **a more strategic approach to better identify the main waste streams and**

significantly increase targeted incentives, collections, sorting and reprocessing methods drawing on a mix of best existing and newer technologies. Specific barriers need to be recognised and addressed e.g. deterrent of cost/time for getting planning approval and permits.

In terms of **prioritising waste streams**, there were many comments on **targeting potential easy wins** such as **food and organic waste, paper/cardboard and metals**. These waste streams represent huge quantities, could significantly reduce transport/landfill, are relatively easy to collect, and have a range of existing processing options and end uses which London can benefit from. Specific examples were given such as: spent cooking oil being refined and used as bio-fuel, saving on large petrol costs (e.g. for converted London waste vehicles) and reducing pollution to sewer systems: food still fit for consumption going to food poverty schemes.

Plastics were seen to present a more **complex challenge** due to the mix of types and applications and the consequent difficulties of collection, sorting and reprocessing. Retailers and food outlets should be focal points for collection of plastic packaging which should be either biodegradable or of a type easier to recycle. Sources of large quantities of single type should be targeted where the reprocessing and markets exist. Support for UK based reprocessing and specifically increased plastics reprocessing facility in the London area were seen to be needed.

Common collection services for similar wastes (i.e. food, food wrappings, paper) from householders and businesses (especially SMEs) were highlighted. **Frequency of collections and provision of appropriate containers** should be designed to achieve balance between minimising transport and facilitating source separation whether through kerbside (e.g. organic waste) or bring systems (e.g. bulky waste at CA sites). Services should be maintained regardless of market fluctuations.

Those with specialist knowledge recommended urgent prioritising of **more reprocessing facilities** to meet existing let alone new targets e.g. super MRF's, anaerobic digestion plants, community composting sites, Integrated Recycling Centres. EfW, recycling plants for specialist wastes like CRT (computer monitor) tubes and new solution for hazardous materials like plasma and LCD televisions.
Construction and demolition wastes were also seen to offer huge potential for reuse e.g. glass reused in road surfaces, reuse of flat roofing, recycled materials offered at discount to community building projects. However, planning procedures and other mechanisms would have to ensure this potential was realised e.g. development requirements; a network of hub sites for recovering contaminated soils rather than disposal as hazardous waste. Several comments highlighted the challenge offered by increased development related to the Thames Gateway and the Olympics.

Specific recommendations on **WEEE** included developing a management infrastructure to tie social enterprises in with private sector especially through reuse, and ensuring appropriate containers for protecting reusable components.

For **clinical waste** an important issue necessity to guarantee effective separation (e.g. through staff training and simplification e.g. colour coding products and containers) because disposal must be to lowest risk option which tends to mean incineration. Current Department of Health guidance appears to tip balance more to landfill: implies reducing disposal costs, and has re-categorised some waste as 'offensive' (i.e. low infection risk) and therefore not requiring incineration.

Table 9 - Do you have any comments or specific recommendations for particular materials or waste streams?

Group heading	Number of comments placed in group
Food and organic waste	17
Plastics	15
No comment	13
Construction and demolition waste	10
Need for reprocessing facilities	10
Need for separate collection systems	9
Paper and cardboard	9
WEEE	7
Acceptability of EfW	4
Tyres	3

Support SMEs	3
Clinical waste	3
Take a strategic approach	3
Hazardous waste	3
Litter	2
Reuse and refurbishment	2
Markets for recycled materials	1
Pallets	1
Glass	1
Textiles	1
Metal	1
Waste water treatment	1
Waste reduction issues	1
Stable collection systems	1
Refer to earlier comment	1
Reclaimed kerb and paving	1
Timber	1

G - STAKEHOLDER ROLES AND RESPONSIBILITIES

How sectors and organisations can help London to manage its waste better
(see table 10)

Most offers were from the **commercial sector**: waste and recycling businesses, recycled product manufacturers and consultancy providers (often the same companies). Specific offers included:

- **increasing the use of existing facilities and services** either with spare capacity (e.g. MRF, collection services, EFW plant, composting plants) or through scaling up activities (e.g. lamps and electrical recycling, local sustainable nappy laundry service)
- **Introducing new facilities and services** e.g. green waste handling sites, super MRFs, MBT plants, a network of 33 Integrated Recycling Centres, sustainable carbon management plant (for fuel, gas and synthetic diesel) underground refuse/recycling storage systems, a network of plasma gasification facilities, new types of container systems, tyre processing through pyrolysis, interactive Duty of Care system to tackle illegal waste operations
- **Offering sites** e.g. Thames Water Sewage Works as centres for recycling cooking oil or co-digesting municipal green waste
- **Raising capital** for partnership initiatives such as ECO parks
- **Sharing experience** in dealing with specific waste streams e.g. plastics, oil, fuel, antifreeze, end of life vehicles/parts, in-office collections of snack food packaging
- **Providing advice and case studies** e.g. training materials and waste audits for businesses,
- **Contributing to strategic development** e.g. as consultant or stakeholder/partner
- **Increased marketing of services and recycled products** e.g. recyclable roofing membranes
- **Developing waste/recycling industry professionalism** e.g. qualifications/codes of conduct

Local Authorities and **public funded agencies** offered to:

- increase recycling and reuse schemes in partnership with others
- carry out more education and awareness raising e.g. award schemes for business
- fund trials, share Best Practice and provide independent information
- facilitate links between businesses from different sectors (NISP), hold stakeholder forums
- participate in joint working on a Development Plan

In the **community sector** a mix of types of organisation meant different types of contributions were offered. Some larger organisations operating like (social) businesses offered to help with informing and motivating businesses and households. Smaller voluntary groups were keen to help but needed assistance to form new partnerships and increase activities.

In the **Construction sector** suggestions included more on-site re-use of demolition waste in new construction, more use of off-site pre-fabrication to reduce wastage in construction, more centralised management of waste in multi-occupancy buildings and specifying a requirement to deal with waste recycling as part of the job award process and obtaining proof that this is being done.

The **other sectors** would try to increase their own performance and provide information to customers and staff. An important **Health** example is the London Environmental Network for all NHS Trusts, SHA's and PCTs who aim to lower the risks from generation/disposal of healthcare waste and improve disposal options. As London's biggest employer this could spread good practise to many homes.

Table 10 - How could you / your sector or organisation help to enable London to manage its waste better?

Group heading	Number of comments placed in group
Waste treatment and recycling business	29
Provision of consultancy	25
Local authorities	12
Manufacturers	9
Community sector	7
Construction sector	6
Health sector	4
Service sector	4
Shared learning and partnership working	3
Government agencies	2
Retail sector	1
SMEs	1
no comment	1

Policy with greatest impact on waste management (see table 11)

Consultees were asked to recommend just one policy for maximum impact. Some found it impossible to pick one policy as they saw a need for action on multiple fronts. A range of policies were suggested but taken as a whole they recommend **a combination of financial measures** which change the cost differential (e.g. raise landfill tax and extend it to business, variable charging, tax incentives) **and legislation** to impose behaviour change (e.g. packaging reduction, specified minimum content of recycled materials in products). There were also recommendations on **strategic planning and coordinated delivery** of **comprehensive collections** to all waste producers and reprocessing facilities for the full range of materials. There were mixed views on support for energy from waste.

Table 11 - If you could recommend just one policy that would have the greatest impact on waste management, what would it be?

Group heading	Number of comments placed in group
Increase landfill tax	13
Require use of recycled materials	10
Address packaging	6
Support energy from waste	6
Resource management not waste management	5
Make individuals accountable	5
Consistent collection schemes	5
Provide collection service for SMEs	5
Mandatory recycling for homes and business	4
Require waste plans	3
Clear definition of waste	3
Penalise non compliance	3
Agree technology for treatment	3
Financial investment	3
Coordinate collection and disposal authorities	3

Variable charging for waste collection	3
Provide incentives	3
Increase recycling	3
Land use planning - find sites	2
Tax breaks	2
Ban landfill and incineration	2
Keep policies clear and simple	2
Effective management of CA sites	1
Education	1
Focus on food waste	1
Legislate	1
Refer to earlier question	1
All new developments have collection facilities	1
Proximity principle	1

H - SUSTAINABILITY

Making waste management more sustainable (see table 12)

Consultees were asked for views on how to make waste management become more sustainable. Comments generally were aimed at moving towards **resource management** and away from waste management, and situating it in the broader context of **sustainable transport, energy, and economic and community development**.

In terms of achieving these aims, **education, aware raising and shifting mind sets** was an important category, but equally many other suggestions fell under the broader categories of ensuring a **comprehensive coverage of collection and reprocessing facilities** including the best **energy from waste technologies**; **financial and legal incentives** to make reduction, reuse recycling and resource recovery cheaper than landfill, and/or compulsory, with strict **enforcement and penalties** for non compliance; and **strategic planning to ensure sufficient sites to minimise transport**. Some responses wanted to **rule out any incineration**. Others saw it as a **key element** or as **part of a mix**. It will be important to establish the most **appropriate type and scale of EfW**. Overall, it must be made easier and preferable for all sectors to play their part in the move towards more sustainable waste management.

Table 12 - How do you think waste management could become more sustainable?

Group heading	Number of comments placed in group
Education and awareness raising	18
Local collection and reprocessing facilities	13
Resource management not waste management	11
Enforcing legislation and harsh penalties	9
Use fiscal drivers	8
Energy from waste	8
Shift in social mind set	8
Market for recycled materials	7
Waste minimisation	5
Transport and proximity principle	5
Resolve land use planning issues	5
Making it the most economic option	5
Put into sustainable development context	5
Stakeholder engagement	4
Learn from best practice	4
Provide strong incentives	3
Closed loop systems	3
Long term plans and strategies	3
Green procurement	2
Enable innovation	2
No comment	2
Definition of waste	1

Diversion from landfill	1
Work with the private sector	1
Work with voluntary sector	1
Individual accountability	1
Develop sustainable landfill	1
Ensure real environmental benefits	1
Apply producer responsibility	1
Address packaging	1
Work with local authorities	1

Part TWO

Stakeholder workshop

Strategic Waste Management for London Workshop, 28 February 2006

Participants from the key stakeholder groups in London were invited to the workshop. Attendees included the ALG, GLA, London First, Environment Agency, London Remade, London Waste Action, London Friends of the Earth, Wastewatch, ICE, and representatives from Health Authorities, the waste management industry, developers, the retail sector, and Local Authorities (See Appendix 4).

The purpose of workshop was to get feedback on the results of the online consultation. In terms of contributions, the high level of company input and voices new to waste consultations was welcomed. The relatively low Local Authority input was attributed to parallel consultations, less interest in wider wastes, and the expectation that ALG would respond on their behalf. Participants were asked to focus on the overall results and six specific themes where key issues had been identified in the online consultation. The suggestions for development and key issues from the online consultation are shown in italics under each theme heading.

1. Ensuring an optimum mix of sites for reprocessing

Suggested development process

- Strategic planning **for London - coordinated, proactive site identification by public bodies responsible for land use planning and waste management (with waste industry),**
- **based on a** strategic appraisal **of what type and scale of sites are needed**
- Ensure planning authorities **make it easier** get the necessary approvals/permits to ensure fast tracking and reduced set up cost for sites which meet strategic objectives.
- Provide **financial incentives** e.g. rates rebates , development fund for prioritised sites
- Make **better use of existing sites** with spare capacity (e.g. MRF, EfW, composting sites) and by introducing new facilities e.g. upgrading CA sites to Recycling Centres.
- **Ringfence existing sites** for waste management activities even if site use changes
- **Consider brownfield, waste lands and empty commercial property and underground waste and recycling storage systems.**
- **Identify partners** who can provide sites e.g. Thames Water Sewage Works could be centres for recycling cooking oil or co-digesting municipal green waste.
- **Require new developments** (e.g. retailer/office block) to include sites for their own and local community waste collection/reprocessing.
- **Ensure** effective local involvement **to address lack of awareness of need for sites and NIMBY opposition (through education, consultation and identifying local benefits).**

Key Issues

- **Scale**. The waste industry tends to want fewer, bigger co-located sites to maximise economies of scale and synergy between a variety of sorting and reprocessing technologies. Communities may favour smaller facilities, located in all boroughs. Is the solution a mix of large sites with co-located facilities and smaller satellite sites even if overall more land is used?
- **Location equity.** Should land be available in every borough for some reprocessing and /or treatment (with access shared by adjacent boroughs) in line with self sufficiency and proximity principles? Or if fuel emissions are minimised by a shift to rail/water, does the distance travelled to sites matter less so that sites could be bigger and located around the edge of London? Should sites ever be imposed? How can we ensure that disadvantaged communities do not bear a disproportionate burden?.
- **Type of Site**. Are some uses more acceptable than others in certain locations or situations, to planners, or to local communities (e.g. composting preferred to EfW, smaller CHP preferred to large EfW). How can be foster confidence in site safety, make sites more attractive (e.g. reduce noise, traffic, smell etc), and bring greater local social and economic benefits (e.g. employment, CHP for social housing, furniture reuse schemes at Community Recycling Centres).

- **Drivers for Strategy**. What weight to give to different objectives, e.g. maximising materials recovery or minimising transport or renewable energy priorities

Participants validated these results and made some additional points. There was a challenge to the view that waste facilities need to be hidden away; where possible they should be made attractive enough for people to live next to them. It was noted that some progress is being made on land-use planning by LAs. GLA, ALG and London RTAB are collecting information London-wide. Land is available but there is competition from housing needs. A clearer definition of reprocessing is needed and EfW needs an agreed role within the waste hierarchy (see below). More effective management is needed of the interplay between the market economy, the planning process, site availability and public perception, especially to make sites worthwhile for local people. A form of Development Corporation could be the answer.

2. Developing an optimum mix of technologies

Suggestions for development process

- Strategic plan **for London covering sites and technologies – priorities and development support for reprocessing industry (see also A and F)**
- Agree roles for technologies **such as MRFs, MBT plants, plasma gasification facilities, tyre processing through pyrolysis, Anaerobic Digestion, community composting, EfW**
- Ensure facilities for specialist waste **recycling like CRT (computer monitor) tubes and hazardous materials like plasma and LCD televisions.**
- Ensure highest safety standards **for all facilities - use as a criteria for selecting technologies**

Key Issues

- **Agreeing the mix/Drivers.** Should this be centrally planned/agreed or left to market forces? What drives the choice and prioritisation of technologies e.g. the 4 R's, public acceptability, cost, time needed to achieve targets? Markets? Energy or transport policy? Should traditional and new technologies be encouraged or only new ones (e.g. traditional mass burn vs. EfW, pyrolysis).
- **Energy from Waste**. How to take forward discussions on the role of EfW, including the most appropriate type and scale; ensuring it does not compromise waste minimisation, reuse, and recycling by its need for large quantities of feedstock; making use of potential benefits e.g. greater resource efficiency and cheaper fuel for low income households. How to address safety concerns including building confidence in information from public bodies.
- **Standardisation.** To what extent should the range of materials accepted and the reprocessing and collection systems that feed them be standardised across London?
- **Source or post collection sorting.** How to agree priorities for collection methods e.g. is the priority to reduce and recover materials for reuse/recycling by separation at source to ensure high grade materials for reprocessing to encourage market development?
- **Flexibility in contracting**. How to avoid getting locked in to technologies – finding room for long term large projects and introducing new and alternative ones.

Participants validated these results and focussed on the key issue of what would drive the choice of reprocessing facilities; the market (i.e. what industry wanted to build) or a strategic plan, and if the latter, what would its priorities be? If reducing CO_2 emissions of waste management were the priority, waste minimisation would become more important. If reducing disposal to landfill were the priority, the approach might be to target the highest percentage of recyclable materials i.e. first tackle paper and card as these form approximately 70% of Commercial and Industrial (C & I) waste. Contracts could be let based on objectives rather than reprocessing options and industry could choose which technology to use.

It was noted that recent new facilities for domestic waste have happened because of public sector investment and partnerships between LAs and industry wanting to take their material. But the pressing need is to motivate industry to reprocess the much greater quantities of non-municipal waste especially C&I waste. The solution was again seen to lie in the interplay between a waste strategy, a planning policy for sites, enabling mechanisms (e.g. capital grants, and the type of materials that arise (influenced through incentives and penalties on waste producers). There was some discussion on whether the online consultation results indicated that a shift in attitudes to the role of EfW is taking place, since so many responses favoured thermal treatment for dealing with residual wastes with the proviso of first maximising reduction, reuse and recycling, and of choosing appropriate scale /technologies/sites.

3. Gathering information/data to inform decision making

Aims

- to collect reliable data on the sources, types and composition of wider waste streams in London, including how they are reused, reprocessed or disposed of, and predictions of future trends in waste arisings and management.
- so that waste regulators and reprocessors can use this data to make better decisions about increasing targeted incentives, collections, sorting and reprocessing activities
- to provide reliable data on cost benefits of different management options so that waste producers can make more informed decisions
- to better track waste to reduce illegal activities

Suggestions for development process

- **More** strategic approach **to better identify waste streams and to using the data collected**
- **Start by** easy wins - **identifying sources of large quantities of single types of materials where the reprocessing and markets exist such as composting of food and organic waste, recycling of paper/cardboard and metals.**
- Support reuse and reprocessing in newer markets **(e.g. refining spent cooking oil for use as bio-fuel, food fit for consumption going to food poverty schemes).**
- Make data available **in online databases and proactively publicise to potential users**
- Carry out waste audits **(could be compulsory/free) with cost benefit analysis and recommendations for improvement. Feed this data in to overall London figures.**

Key Issues

- What sort of data **to collect**
- Who **will manage its collection and use**
- How **to improve on current situation - existing data is unreliable and not specific enough to plan for improved services and facilities in London.**
- Split **between municipal and non municipal waste**

Participants validated the online results in general, and elaborated on them, noting there had not been a large focus on data in the online results. It was felt to be an important area for those wanting to make evidence-based decisions in planning, service provision, and setting targets.as well as for businesses wanting to invest in facilities (data enables them to make decisions on location and type). Better data could lead to well-informed, competitive tenders and better services. In the short term, top down data could be collected and extrapolated from, verified by bottom up snapshots.

Existing information should be shared by NHS, Biffa, and other large organisations but currently there is no central place to send it and no incentives. In the medium term there could be incentives or obligation to collect and report (e.g. tax breaks). In the long term legislation might be the solution. Data management needs a budget, a single body to co-ordinate collection and sharing within the context of a strategic plan.. It will be important to collect information on tonnages as well as the volume and number of containers emptied. Caution was expressed that a data focus should not divert excessive funding nor otherwise hinder action.

4. Influencing markets by intervention or reliance on market forces

Suggestions for development process:

- To use **optimum balance of intervention[1] and stimulation**[2] measures so that market forces work more in favour of sustainable resource use
- **Introducing measures to** change the economic climate **i.e. to reduce the cost of waste materials compared to virgin materials, and to ensure a high cost of disposal and low (or no) cost of reuse/recycling to those disposing of their own waste**
- **Introducing measures to** create stronger demand **through other motivators e.g. positive image associations, awareness of business opportunities**

Key Issues

- Balance. **What balance to strike between intervention and stimulation? How to avoid damaging business e.g. making SMEs less viable compared to large companies**
- Market dependency. **Should materials be collected for reprocessing if (local/UK) market doesn't want them, or when prices/demand fluctuate?**

Participants validated the results in general. There was some sense that the online consultation had come up with a clear message on the importance of money as a motivator at every level. This would imply that changing economic conditions are the key to creating the necessary market economy for non-municipal waste within London. Increasing demand for recyclate/recycled materials by lowering the cost of products to at least same as those from virgin materials would stimulate industry to build the reprocessing infrastructure and drive collections. Additional stimulation of market forces could include financial incentives to the reprocessing industry such as capital grants. However it was emphasised that the aim should be to stimulate long-term change, whereby a critical mass point is reached so that the market is changed permanently and grants or tax incentives can cease.

Intervention measures were not ruled out, but there were concerns that they do not necessarily lead to elegant market solutions and sometimes fail to get the desired result (e.g. WEEE in UK). It was noted that if Central Government procurement shifts significantly to recycled products, as recently indicated, it will have a major impact on markets.

---

[1] Intervention

- Compulsory targets; for procurement of recycled goods especially for public sector, content level or use of recycled/recyclable materials, in specific products and processes
- Mandatory recycling of materials that are easy to separate e.g. paper/card, waste disposal quotas and planning conditions on developers for reusing/recycling waste generated
- Require new/refurbished buildings to design in facilities for better/centralised management of waste e.g. separation and storage (also in multi-occupancy buildings)
- Restrict choice e.g. ban plastic bags or only allow re-useable or biodegradable bags
- Enforce existing legislation: landfill regulations 2005, EU Packaging/WEEE Directives
- Producer Responsibility legislation to encourage effective life cycle assessments as part of product approval and disposal/recycling costs to be levied within the purchase price Packaging and end of life products to be returned to retailers who share responsibility for recycling with the original product or packaging producer. Make retailers give discounts to customers who leave behind reusable packaging e.g. clothes hangers
- Strict enforcement and penalties for non compliance with all above measures
- EA to de-classify recyclables as waste

[2] stimulating market forces

- Financial measures: variable charging, tax breaks, rates rebates, higher landfill taxes (hypothecated revenues for use only in recycling) differential landfill charges for waste types, a more complex resource tax, lower or zero VAT for recycled and reusable/recyclable products, tradable recycling credits/waste permits; fund for SMEs to enable change in waste management practices (like Carbon Trust R&D grant but with staff labour as match funding)
- Investment in new reprocessing technologies and new uses e.g. in every day objects like kettles
- Better access to consistent quality feedstock at more stable prices from effective collection and reprocessing facilities e.g. waste brokers, waste exchanges/online databases. Trials to show potential for collecting feedstocks e.g. 'in-office' collections of recyclable food packaging
- Better marketing of recyclate as substitute for virgin materials, to raise awareness of opportunities, and good practice (e.g. award/accreditation schemes)
- Better marketing of recycled products at purchasers, to raise awareness of availability and quality (e.g. better brand image, labelling, a formula for life cost and end of life cost
- Standards to demonstrate that recyclables/recycled products provide equal quality, attractiveness and fitness for purpose, to help remove unnecessary barriers e.g. specifications that exclude them.
- Encourage large businesses to have green supply chains to change SME suppliers practices

5. Supporting business by education, information, and service accessibility

Suggestions for development process

- **Ensure accessible collection services.** More comprehensive, consistent and simplified recycling services. Options include: a one stop shop approach with all materials taken with maximum recycling/recovery offered, not separate contracts for each material/disposal route; Green Business Parks with full range of information and collection facilities which local business including SMEs can access; Local Authorities to collect from SMEs where waste is similar to domestic (e.g. food waste) ; more tailored at specific waste arisings (eg food and paper) and different business types (e.g. offices or hospitality venues); more frequent collections to reduce storage need, and at more suitable times (e.g. for hotels not when it wakes up guests)
- **Encourage other enabling services** which give more direct contact and practical support such as advisors, helplines, staff training, waste audits, waste brokers, partnering between small and larger companies, or joint collection contracts for SME tenants of office blocks or industrial units
- **Ensure practical information** is available at point of purchase/disposal decision making about : sustainable purchasing and design; disposal options for each waste type; what services are available at what cost; what incentives, regulations or penalties exist; database of recycled /recyclable products. Information to be targeted at different audiences e.g. procurement managers (waste disposal contracts and purchasing supplies), product or process designers, designers/planners of structural projects. Also provide feedback on what happens to materials once collected e.g. how many trees saved or what products have been made from their recycled waste
- **Find ways to educate business** about social/environmental impacts of waste, and benefits of more sustainable resource and waste management to foster responsibility
- **Ensure effectiveness of communications** which should be easy to understand, authoritative, consistent and multi lingual and regularly repeated/updated

Key Issues

- **Who offers collection services to business?** What should be Local Authorities' role; regulators, facilitators or service providers? LATS and H&S costs create a disparity between LA and private company services and are disincentive to LAs, many of whom are withdrawing from commercial collections. Can landfilled tonnage still count regardless of who collects trade waste?
- **What types of business should get support?** Are SMEs a priority because there are currently less services available to them and they exist in large numbers in London? Or large companies with large waste arisings which are easier to target?
- **What level of standardisation is needed**? Do London wide businesses need a coherent approach across borough boundaries?
- **Balance.** Education and information alone are not a substitute for better collection and other support services. Money for consultancy services to advise may be better spent on pilots for practical solutions or spreading existing tried and tested solutions.

Participants validated the results in general. Discussion picked up on the issue of the LA role in relation to wider wastes, where they have no powers or targets and therefore no resources to act. Nevertheless the feeling was that they should make every effort to maximise their role and look at income generation to sustain activities for example in signposting, collection and general facilitation. A strategy would need to address LA responsibility and practise, including conflicts of interest, given that trade waste can be profitable. Most LAs don't know how much commercial waste there is, so cannot plan.

Given the mix of businesses in London and the diversity of the waste services sector, participants favoured finding appropriate roles for big waste management companies, community recyclers and local authorities (see below). This would help to match producers' and collectors' needs e.g. in some areas like busy high streets it may be best to have LA single collection. How to divide services up by size of business, or type of waste stream needs further consideration. Facilities management companies should be a target especially regarding office building. It was felt that standardisation of collections/materials was probably not needed, although it would be useful to identify and circulate good practise. Green waste sites should be upgraded to accept all food wastes, and there should be more local sites where different materials can be recycled at the same place to reduce transport.

There was agreement with the need to take a different approach to SMEs and big C&I businesses. SMEs need cheap services to access and should not be hit by penalties which damage their business or encourage them to find other routes like taking waste home or dumping it. Data and a strategic decision are needed to decide what priority to give to SMEs.

6. Supporting the waste services sector to meet business needs

Suggestions for development process

- London strategy for all wastes **with guaranteed quantities of recyclable/recoverable wastes to be collected, site identification and planning support, set up grants, underwriting, loans, tax breaks. Such a strategy will help reduce uncertainty, provide a framework for partners to plan, and release capital**
- **Support for UK based reprocessing**, e.g. investment, start up grants, especially for plastics reprocessing facilities in the London area
- **Plough back landfill tax** credit into investment in new facilities
- **Make transporting materials easier and cheaper** e.g. exemptions from congestion and parking charges especially for community recyclers/charities; removing night time lorry ban in non residential areas
- **Redefinition of when waste becomes a raw material** by Environment Agency
- **Waste data** – see D
- **Stricter enforcement against illegal activities** and **cleaning up legitimate waste services** for better public image/sites more used e.g. CA sites to recycling centres, enclosing reprocessing facilities in attractive light industrial units
- **Increasing markets** for recycled materials through stronger specification by all government departments and planning conditions for new build and refurbishment.
- **Develop waste/recycling industry professionalism** e.g. qualifications/codes of conduct, quality assurances
- **Ensure transfer of experience** in dealing with specific waste streams eg plastics, oil, fuel, antifreeze, end of life vehicles/parts, in-office collections of snack food packaging. Providing advice and case studies e.g. training materials and waste audits for businesses

Key Issues

- **Contracts**. For large scale reprocessing facilities one big long term contract is usual, but smaller operators want the opportunity to bid for localised waste collection and separation/ treatment contracts so as to provide local jobs and keep money and other resources within the community. Some procurement processes exclude local SME service providers because of the aggregation of all services into one big contract (i.e. waste disposal with cleaning services)
- **The diversity of the waste services sector.** The sector is a mix of large and small commercial organisations, public bodies, community and voluntary sector groups. How can each be supported to make best use of their specific strengths (e.g. many reuse projects are a niche strength of the voluntary sector), and how can they work better in partnership, including the possibility of offering collective joined up services?
- **Customer focus.** Can all parts of the waste services sector move towards offering better recycling services to business, or are there conflicts of interest which must be addressed?
-

There was general agreement with the online consultation results, particularly on the importance of planning and licensing support. However, the feasibility or need for guaranteed quantities of waste/long term contracts from the commercial sector were challenged by some. Data on volumes, types, and sources of waste would help those tendering for waste contracts to make reliable predictions even if amounts cannot be guaranteed. There was also some question over whether it matters if smaller contractors are pushed out by larger companies where big single contracts are let. The motivation for industry to invest in facilities for commercial / trade waste should be further explored.

Additional comments included incentivising commercial sites to offer a wider range of 'financially attractive' recycling services; a London wide information service covering rates, all reputable operators and opening times; assistance for smaller outfits (e.g. from BREW / WRAP / Envirowise) incentives for tip operators to segregate waste and pass on cost saving to waste collectors to encourage segregation e.g. of plastic, rubble, green, electrical; development support for wharfs if more waste is to go by water.

A need to resolve issues between LA and commercially operated bring sites was also identified (where there is competition for the valuable elements of the waste).

Key messages for the GLA

The interplay between market and strategic planning is a key issue. More consideration should be given to the investment climate (private vs public sector funding). Direct intervention like subsidies may be difficult because of the market's diversity and complexity.

Waste planning is clearly a key to facilitating change but there more specialist planners will be needed by GLA and by Boroughs (a London wide specialist team) if the strategic authority is not set up. There will also be a need for more skills in procurement such as knowledge of the market and how to do it well.

There should be more focus on what London can do itself from all the recommendations in the consultation. Given the disconnect between the high target for London and the lack of incentives the Mayor has control over, creative ways to lever change must be found within existing powers of GLA and LAs such as powers of competence or planning powers. The Construction and Demolition Waste Protocol is a good example. Local Authorities should be given more formal responsibility for promoting recycling in the commercial sector. London should be big enough to influence the commercial sector for example through voluntary agreements on targets.

The GLA should take on responsibility for promoting policies upwards to Central Government for example on how it generates and manages its waste in London. It could lead on green purchasing and contracting long-term for waste management (this point is not in the consultation or in the Wider Waste Strategy). Central government could also be lobbied to set policy to drive business to invest long-term (not necessarily through contracts).

APPENDIX 1

Table 13 – Participants that submitted responses to the online consultation

First name	Surname	Organisation
Peter	Johnson	
Robert	Stranks	Retired
Colin	Roberts	London Waste Action
Neil	Carrett	London Community Recycling Network
Penny	Walker	Verlander Walker Ltd
Clive	Holloway	SMR (UK) Ltd
Ivan	Richardson	Verno Ltd.
Deborah	Sacks	EERA
James	Perkins	London remade
Mary	Corin	Grosvenor Waste Management Ltd
Colin	crooks	green-works
Paul	Anderson	Kent Art Printers Ltd
Conrad	Young	
Noel	Harasyn	PYReco
Neil	Winship	Alpheco Composting Ltd
Dominic	Gooding	CEN
John	Nicholson	Bio-power Uk Ltd
Roland	KANNOR	Kanoil
Dan	Crossley	
Kay	Twitchen	Essex County Council
Veronica	Broomes	
Iain	Mackinnon	The Mackinnon Partnership
Andrew	Curley	Kingston University
Lawrence	Rayment	Community Computers UK
David	Hart	Lambeth Community Initiative
Brian	Wellings	London Borough of Southwark
Alan	Kirk	Bywaters (Leyton) Ltd
Kevin	Chapman	London Borough of Hounslow
MARY	HANLEY	L.B. HAMMERSMITH & FULHAM
Daniel	Green	ECT Recycling
Ian	Ranger	Allianz Cornhill Management Services Ltd.
Jonathan	Straight	Straight plc
Stephen	Kain	Loval Consulting
Kevin	Hempson	Marchant Manufacturing Co Ltd
Paul	Dumble	TfL
Neil	Caldwell	ASI Solutions plc
Henry	Abrahamian	Rosinco AB
Ian	Barnes	The Boots Group PLC
Nicola	Cheetham	Transport for London (Streets)
Tina	Backhouse	CEME
Nigel	Woof	National industrial Symbiosis Programme
Alan	Cook	
Lindsey	Sutcliffe	Cleanaway Ltd
Hugh	Lucas	Foster Yeoman Limited
Alan	Marshall	blue line
Marion	Ingle	The Polymer Centre, London Metropolitan University
Alan	Shilstone	The Queen Elizabeth II Conference Centre

First name	Surname	Organisation
Will	Moloney	British American Tobacco
Nicholas	Hallett	Mott MacDonald
Ray	Barwick	Croydon ARC
Robert	Tate	In Kind Direct
Mike	Tregent	
Rowland	Hill	Marks & Spencer
MEL	FISHER	ECO ISLAND LTD
Peter	Caddy	The Cavendish Hotel
Mel	Grech	Beyond Green
Geoff	Brinsden	Radio Taxis Group Ltd
Barry	Lister	WLWA
Kate	Knight	Park Royal Partnership
Yvonne	Gould	GlaxoSmithKline
Sarah	Robertson	MITIE Waste & Environmental
Francis	Browne	Geesink Norba Group
Clare	Taylor	Clare Taylor Consulting
Gary	Ince	North London Ltd
Paul	Lincoln	Toynbee Housing Association
Billy	McIntosh	Ipsos MORI
Margaret	Bates	The University of Northampton
SUSAN	JUNED	National Industrial Symbiosis Programme
Mark	Terrell	Thames Water Utilities
Emma	Welch	Olympia
Robert	Tyldesley	Britanica
Richard	Dicker	Potter Raper Partnership
Lynda	Hayes	Morley Fund Management
Simon	Oelman	Royal Borough of Kingston
Ray	Young	National Museum of Science and Industry
Annie	Sherburne	Annie Sherburne designs at pure fab east
Norman	Kemp	The Lamp Recycling Company Limited
Patricia	Balson	Clifford Chance
David	Fitzsimons	Oakdene Hollins
Julian	Burton	PCS
Stacey	Collins	Freshfiels Bruckhaus Deringer
Saskia	Merriman	Global Action Plan
Nick	Ottewell	AV Produce Ltd
Robert	Firbank	Dunstable Waste Group Ltd
Mark	Dodds	The Sun and Doves
Edward	Kosior	Nextek Limited
Stephen	Moody	David Richards Ltd
Daniel	Hawkins	Think London
Stewart	Anthony	Centre for Environment and Safety Management for Business
Ruth	Hampson	Cafedirect plc
Caroline	Cannon	
David	Farebrother	Land Securities
Neil	Bookless	EECO Ltd
Kenny	Wilks	London Borough of Islington
Dee	Hyatt	Mott MacDonald Ltd
Holly	Berry	Reclaim Fashion
Arthur	Stitt	Calverts

First name	Surname	Organisation
Matthew	Bennett	London Recycling Ltd
Liam	Devany	Highbury Builders Collective
Diane	lee	Kingston hospital nhs trust
Barrie	Hughes	London Manufacturing Advisory Service
John	Williamson	London Borough of Southwark
Peter	McCann	Plastic Omnium Urban Systems Ltd
Neil	Allen	NHS
Paul	Middleton	YouGov plc
David	Callam	Croydon Advertiser Group
Tom	Lawson	Balfour Beatty Capital Projects Limited
Tom	Moon	Esha (UK) Ltd
Bruce	Terrell	Community Waste
Tony	Hammond	City of London Corporation
Peter	Hallam	VCU Europa
Edward	Hudson	UBS
john	phynn	lancaster office cleaning
John	Amner	FMC / Southanpton University
Simon	Rooksby	Computers for Charities
Kiran	Grover-Hesselgren	GOL
Henry	Emblem	Environmental Packaging Solutions
Rod	Fox	Evolution Projects (UK) Ltd.
Emma	Burlow	Emma Burlow
Fred	Keeling	Cleanaway Ltd
Stuart	Davis	Martin Brokers (UK) PLC
Ken	Hullock	Planning Service, L B of Brent
tony	scott	londonwaste ltd
Moira	Turner	SSI Schaefer Ltd
Hilary	Burden	London Borough of Camden
Penny	Spirling	LB Sutton
James	Dubrey	Waste Watch (Recycle Western Riverside)
Raymond	Coombes	Hilton Hotels
Terri	Hudson	LB of Croydon
Michael	Heap	CED Ltd
Sarah	Robinson	Hammersmith Community Gardens Association
Matt	Jenkins	Pearce Recycling Ltd
Camilla	Sherwin	Resourceful Solutions
Neil	Grundon	Grundon Waste Management LTD
Bridget	Fox	London Borough of Islington/NLWA/ALG-TEC
Janice	Hennessey	Barclays
Derek	Cornwell	Waste Innovation Solutions
Richard	White	TrackerBack
Richard	Mason	UBS
KEITH	FREEGARD	AXION RECYCLING LTD
Malcolm	Ives	education
Peter	Carroll	Life on Mars ltd
Don	Smith	Electrical Recycling Company Ltd
simon	stenning	FooGo
Ellie	Bendall	C4S
Chris	Holmes	NIBC Bank N.V.
Simon	Henzell-Thomas	Business in the Community

First name	Surname	Organisation
Phil	Ackerley	Environment Agency
Hilary	Vick	Nappy Ever After
Andrew	Winter	Source: Prospectus Group
Claire	Vance	TRL
Julian	Sharples	Artmongers and Wonder Remedies
Carolanne	Cunningham	Kirkpatrick & Lockhart Nicholson Graham LLP
Harry	Waters	Agrivert
Simon	Honey	
Gillian	Cox	Lloyds TSB
Claire	Hartten	Wormhole Associates
Jae	Mather	Intelligent Sustainable Solutions
Jim	Carling	
Naomi	Nicholson	Mansell Construction
Phil	Smith	NW London Strategic Health Authority (SHA Estates)
Chris	Coggins	trading as WAMTECH
Alan	Davis	NHS
Andrew	Lloyd	Royal Brompton & Harefield NHS Trust
Alan	Bridges	Standard Chartered Bank
Philip	Holmes	Chelsea and Westminster Hopsital
Orlando	Arnold	Refugee Counciil
Paul	Dalrymple	Eco Aggregates Ltd
Helen	Sargant	EDAW
Alex	Green	FareShare
Martin	Clayton	Geoplan Limited
Pamela	Smith	
Tim	Snell	Adams Hendry Consulting Ltd.
Tim	Watson	MRL

APPENDIX 2: RESPONSES TO THE ONLINE CONSULTATION THAT WERE RECEIVED AFTER THE DEADLINE OR THAT DID NOT FIT THE STRUCTURE

A number of responses to the consultation were received after the deadline by e-mail. The full responses were sent to LWA.

Anthony Partington	Canary Wharf Management Limited
Peter Sinclair	Commercial Division, Cluttons LLP
Tony Jarvis	ELWA

APPENDIX 3: PARTICIPANTS INTERVIEWED BY TELEPHONE

In addition to the online consultation, and to increase input from specific sectors, several stakeholders were contacted and invited to participate by telephone interview.

Roy Parrish	Lloyds of London
Gloria Randall	Epsom and St Helier NHS Trust
Alice Wilton	Regent-Marriott.

APPENDIX 4 ATTENDEES AT THE STAKEHOLDER WORKSHOP

Doug Benjafield
London Waste Action

Mr Bruce Bratley
First Mile

Mr Phil Butler
London Friends of the Earth

Mr Stephen Didsbury
London Borough of Bexley

Ms Sophie Easteal
GLA

Mr Jim Fielder
Wastewatch

Mr Andrew Garcia
Cleanaway

Mr Peter Gerstrom
ICE

Mr Peter Gluckman
SE London Strategic Health Authority

Ms Jane Hersey
BioRegional Development Group

Ms Katherine Higgins
GLA

Ms Claire Jenkins
London First

Mr James McKechnie
Sainsbury's

Mr Jason Mohr
AnyJunk?

Mr Michael Ojo
ALG

Ms Gloria Randall
Epsom and St Helier NHS Trust

Mr Simon Read
London Waste Action

Mr Colin Roberts
London Waste Action

Mr Danny Silverstone
London Remade

Mr Bill Swan
Paper Round Ltd.

Ms Ros Ward
London Borough of Barnet

Mr Dave Wardle
Environment Agency