

# The Mayor's Draft Municipal Waste Management Strategy: the London Waste Action Stakeholder Dialogue Response

## Preamble

This document is in two parts:

Part 1 lists the stakeholders' recommendations.

Part 2 describes the process and results of London Waste Action's stakeholder dialogue process that has considered *The Mayor's Draft Municipal Waste Management Strategy for London*.

## Part 1

### Recommendations

It should be noted that while not every individual or organisation represented in the process would sign up to every detail of every recommendation here, there was broad agreement that these recommendations in general would, if implemented, significantly advance the achievement of a sustainable waste strategy for London.

- There should be no presumption against incineration or against any recovery techniques, and there should be a willingness to explore all options in order to achieve a sustainable waste strategy.
- The Mayor should lobby to secure:
  - adequate funding for the waste strategy and recycling methodologies to achieve recycling targets
  - adequate revenue and capital funding for local authorities and for London.
- There needs to be an objective analysis of the structure of waste collection, disposal and planning in consultation with Local Authorities and other partners.
- If a high recycling target is to be kept in the strategy, the document must demonstrate how this is to be achieved.
- A land use planning framework for the provision of waste facilities, large and small, should be established to enable plants to be built by 2005/6 – so that some facilities are ready in time to replace landfill capacity.
- Incorporate into the Strategy an implementation and business plan.
- The Mayor should play a facilitating role in combining the use of funds from all over London to promote an awareness of waste issues through a major education campaign - targeting politicians, the public, schools and businesses –

with simple and straightforward messages akin to those used to promote the wearing of seat belts or the awareness of the dangers of smoking.

- The Mayor should encourage open and independent debate/review of residual waste and BPEO.
- The Strategy should promote green procurement by recognising the demand side and closing the loop between supply and demand.
- There should be Supplementary Planning Guidance to ensure that all new build and conversions (both residential and commercial) include minimum levels of recycling collection facilities.
- There should be enforcement measures to ensure that producers of municipal waste reduce or recycle it (where recycling is possible).
- There should be a forum for the private sector, industry, local authorities, retailers and communities across London and neighbouring regions to enter into dialogue with the aim of achieving greater reduction, re-use, recovery and recycling of municipal waste.
- The Strategy should have a high focus on waste reduction and the Mayor should have a role as a mouthpiece for developing a reduction plan with relevant groups. The Mayor should also lead on the development of new techniques for waste reduction by households and businesses.
- The Strategy should be integrated with other mayoral strategies.
- The Strategy should promote incentives for householders to reduce, re-use and recycle – and refuse [packaging etc].
- The Community Sector should be recognised and supported.
- The role of the private sector should be recognised.

## Part 2

### Introduction

In anticipation of the development of *The Mayor's Draft Municipal Waste Management Strategy for London*, *London Waste Action* brought stakeholders from a wide range of interests together to discuss the foundations of a waste strategy for London.

From September 1999 through to May 2000, The Environment Council<sup>1</sup>, an independent charity that manages stakeholder dialogue processes, convened a series of workshops that engaged a wide range of stakeholders. This process was

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funded from landfill tax credits provided by the RMC Environment Fund, the Mayor of London, and the Environment Agency.

The recommendations from these workshops covered six main themes: Collection, Transport, Infrastructure, Contracts, Organisational Structures and Markets, Awareness, Data and Dialogue. The deliberations were compiled into a report that was handed to the Mayor in September 2000.

London Waste Action then secured funding from the RMC Environment Fund to engage stakeholders in a review of the Draft Strategy and approached The Environment Council to identify appropriate ways to achieve this. The Environment Council suggested that reviewing a document in a single meeting with 100 or more stakeholders would not be a practicable way forward.

London Waste Action decided that a managed dialogue over the Internet, followed by a workshop for a smaller representative group of stakeholders, would be the best way to engage all stakeholders in preparing a joint response to the Draft Strategy in the time available.

The Internet review process was managed by Dialogue by Design<sup>2</sup>, a facilitation body that uses specially developed software to conduct consultation and collaborative document review processes over the Internet. Stakeholders were invited to participate; if they registered they were sent passwords to give them access to a secure web site where they could respond to every section of the Draft Strategy. The comments they submitted were then collated and grouped to help an independent editor write a draft response document.

This was followed by a workshop with representatives from all sectors commenting on the draft response document and making some key recommendations for submission to the Mayor. The core group of stakeholders and the independent editor then reviewed the document for clarity and balance. The London Waste Action Stakeholder Dialogue Response is the final result.

### **Who participated**

- 250 organisations were invited to participate.
- 127 individuals from 101 different organisations registered to participate.
- 53 individuals from 52 different organisations submitted comments.
- In total there were 997 separate submissions on the document.
- There was a cross-section of representation from the following sectors:
  - the waste management industry
  - retailers
  - local government
  - national government and agencies
  - community groups
  - not-for-profit recyclers, and
  - non-government organisations.

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## Methodology

Part 2 of this response document is a summary of the responses made during the Internet review. Every response by every participant was read. The collation and grouping was then made available for all registered participants to see on the web site of the facilitating organisation, Dialogue by Design.<sup>3</sup>

Part 2 of this document follows the same structure as the Mayor's Draft Strategy, and aims to give a fair overview and a *flavour* of how participants in the Internet review reacted to the Draft Strategy. There are a number of points that need to be stressed:

- This was not an opinion poll. Not everybody who was invited to participate registered to do so; not all who registered actually submitted comments; and not all who participated chose to comment on every point. For this reason caution should be used before attaching undue significance to the *number* of comments in favour of one or other point of view, and why terms such as 'a majority of participants' or 'some participants' are used in preference to exact numbers.
- The quotations chosen to illustrate a point of view are *samples*. They have been chosen because they encapsulate or articulate very clearly a particular point of view shared by a number of participants. The best way to get a *full* impression of how participants commented is to read all the comments.

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<sup>3</sup> A complete copy of all collated comments is available as a Word document (160 pages) on request from [facilitators@dialoguebydesign.com](mailto:facilitators@dialoguebydesign.com). We recommend that registered participants log on using existing passwords and usernames to review the collated results.

## Summary of key issues raised

A number of issues were mentioned repeatedly and can be regarded as the main challenges that the participants identified within the Draft Strategy.

### Meeting the targets

107 comments out of the total of 997 comments on the whole document make reference to meeting targets. A small number of people welcome the ambitious targets. Many others, while welcoming the ambitious targets, have significant concerns about the ability to achieve them. These concerns are shared across all sectors.

There are particular concerns around:

- public willingness to participate in initiatives on waste,
- lack of space for infrastructure for collection facilities, and
- markets for end products.

### Incineration

89 comments out of the total of 997 on the whole document make reference to incineration or energy from waste. The majority question the presumption against incineration or argue that to set incineration against other means of waste disposal is to create a false dichotomy; one participant points out that the presumption against incineration undermines the very principle of looking for the Best Practical Environmental Option (BPEO).

The most repeated comments around this subject are:

- Targets won't be met without incineration
- The environmental implications of other disposal methods are as bad as, or worse than, incineration
- Evidence that incinerators crowd out recycling or reduce recycling rates is lacking.

There are a number of comments suggesting that differentiation should be made between mass burn incinerators and emerging technologies. Some also feel that there is a danger that the whole strategy will be ignored if arguments start to focus simply on the incineration issue.

A small number of participants strongly support the presumption against incineration and make further points about perceived dangers to support their comments.

### Waste minimisation

79 comments out of the total of 997 comments on the whole document make reference to waste minimisation or reduction. By and large there is absolute support for the emphasis placed on waste minimisation, and some comments want the point to be even more strongly made. However, there is significant concern about the practicality of achieving waste minimisation. Some comments link this to a need to address consumption levels and the projected increases in the volume of waste.

### Proximity and transport

47 comments out of the total of 997 on the whole document make reference to the proximity principle and transport. There is almost universal agreement that waste should be dealt with as close to its source as possible and that transport, particularly by road, should be reduced. However, there were comments that the areas around London should be included in this as there are implications for them. Some

stakeholders point out that the proximity principle must take into account the fact that reprocessing facilities tend to be outside London.

### **Finance and funding**

35 comments out of the total of 997 comments on the whole document make reference to finance and funding issues. Most of these reflect anxiety about lack of funding generally. There are some specific comments about the length of waste contracts. The majority feels that these are not long enough for companies to invest in infrastructure, but a few welcome the idea of reviewing contracts every 3-5 years.

## **Comments on specific sections of the Draft Strategy**

### **Foreword**

Many participants use their comments on the Foreword as overall comments on the entire Draft Strategy. They are, by and large, positive. For example:

- *'Excellent, it appears to review the current situation honestly, recognise the significant challenges pragmatically and face up to these positively.'*
- *'It represents an overview of London as a whole and points us towards waste processing procedures in a comprehensive rather than a piecemeal manner. This is a welcome change especially given that this is the first time that a London wide statutory body has begun this process.'*
- *'Clear concise and sets the overall picture'*
- *'The Draft Strategy is a very imaginative, forward thinking document and the Mayor and his team have to be complimented on a detailed 'out-of-the-box' appraisal of the opportunities offered by sustainable waste management.'*
- *'Good sense of urgency with measured need to get views of Londoners.'*

However, there are also some reservations about the overall balance of the Draft Strategy:

- *'The Foreword reflects the tenor of the Strategy as a whole, a presumption against incineration and the need for a "massive" increase in recycling of household waste.... In the short to medium term London will need additional waste incineration capacity to enable time to change attitudes and for a recycling infrastructure to be put in place.... In short the Foreword needs more balance and realism.'*
- *'The introduction of un-substantiated health concerns about incineration so early as the fourth paragraph gives an indication of bias against one of the key disposal options that must be considered under the strategy.'*
- *'The foreword should put more emphasis on waste minimisation as being top of the waste hierarchy rather than see recycling as the automatic answer to the landfill/incineration dilemma.'*
- *'However, the question might be legitimately asked as to how an honest and open public debate can be had regarding waste incineration when the Mayor seems to have already made up his mind about the technology.'*

There is also some concern about the overall realism of the Draft Strategy:

- *'Broadly support the overall aims and objectives but concerned that targets are over-ambitious and the strategy is over-optimistic on the ability to deliver the systems, facilities, etc necessary to meet the targets within the timescales set.'*

A number of points are made regarding the need for more emphasis on particular issues in the early part of the document. These include:

- More focus on sustainable development
- More emphasis on waste minimisation
- More stress on emerging technologies

## Executive Summary

Most participants are positive about the Executive Summary, for example:

- *'A very good summary of London's waste situation, what is being achieved currently... I particularly welcome the policy to maximise reduction, recycling and composting before energy recovery is even considered. Focus is given to stakeholder alliances, better and quicker data, funding and essential reviews of collection and disposal contracts at 3 and 5 years respectively. The intent to lobby for new legislation to enable London's ambitious objectives to be achieved, may very well be needed to be pursued.'*

Some participants find it a little too long, while others immediately plunge into criticism of its general drift and the presumption against incineration. There is some concern about the accuracy of some of its figures and definitions, and a number of participants feel 'some simple graphs and pictures' would aid the presentation.

Some comments on this section point out things felt to be missing from the Draft Strategy, for example:

- *'As far as we can see, no reference has been made in the Mayor's strategy to producer responsibility for packaging waste.... Recycling of Packaging waste should therefore be a key element of the Mayor's future waste strategy.'*
- *'We want the Draft Strategy revised so that it acknowledges the current role of Community Recycling activity in respect of proposed policies and proposals.'*

Participants also express concern that the Draft Strategy does not address sufficiently the problem of commercial and industrial waste.

Finally, a number of participants react strongly against the mention of Agent Orange:

- *'The reference to Agent Orange in the incineration section of the forward is irresponsible and is inconsistent with the information provided in appendix's 3 & 4 that infer that incineration is heavily monitored and safe.'*
- *'The reference to Agent Orange is not appropriate in this document. It is true that dioxin was present in Agent Orange and that large quantities of dioxin were released in the Seveso incident, no subsequent study has shown any link between dioxin release and human health. This should provide reassurance than the other way around as the report implies.'*
- *'3.74 to remove the reference to Agent Orange and Seveso. This is scaremongering in the extreme.'*

## Chapter 1

This short introductory chapter provokes relatively few comments. Several are concerned about the practicality of the vision it sets out:

- *'While the chapter usefully sets the scene as to why our approach to waste has to change in the long term, it does not then seek to place this within the*

*practicalities and conflicts that will invariably need to be faced. For example, while everyone supposedly agrees that recycling is an environmentally good and virtuous thing, this does not automatically mean that they would be willing to see an increase in their council tax to increase provision, or would be happy to see a MRF built in their neighbourhood.... While it is important in a document like this to spell out a positive vision, it must also be alive to the realities of the existing situation - it has to begin with things, and people as they are, and not as it would like them to be!*

- *'Let's be realistic. Waste reduction is not as simple as this Chapter makes out. Items which can be repaired may not be as 'warmly welcomed' as we think...'*

## **Chapter 2**

This chapter assembles a range of information about waste, and most participants welcome its presentation, though some have detailed questions about the accuracy of some of the data and would prefer it to be referenced differently:

- *'Caution regarding reliability of all waste statistics. The chapter moved from statistical and objective comment on national targets on policy and strategy into wider issues such as barriers to recycling, public awareness and lifestyle. Whilst these are key issues they would be more appropriate in other chapters and restrict this one to objective statements.'*
- *'Much of it is arguably wrong or misdirected. It fails to address the worst case scenario. Facts are needed if we are to plan for the pessimistic as well as the optimistic outcomes. It would help to understand the arguments if each 'fact' had a reference to its source.'*

### **Issues omitted**

There are also some comments about what the chapter omits:

- *'Chapter 2 should include a section on the impact of different waste management methods on climate change. Various studies have shown that recycling has a significant impact on CO<sub>2</sub> reduction compared to incineration and landfill.'*
- *'I was astonished to find no discussion of the impact of landfill emissions on the environment. Landfills are the second largest source of methane emissions, methane being a potent greenhouse gas. Even those with state of the art energy recovery are able to capture only a fraction of the gas emitted. I am at a loss to speculate as to why this discussion was omitted in view of the fact that the subject is so timely. Further, there is no discussion of the impact of landfill on soil and water quality. Even modern engineered and lined landfills present this risk and the abatement technology is very limited.'*

## **Chapter 3**

The comments on this chapter are mostly positive, for example:

- *'The vision and intended linkages are very well conceived and deserve, indeed need the support of all public and private sectors/bodies that must be involved. An early start must be made if the vision is to be realised in the intended timeframes.'*

But there is some concern about the practicality of implementing this vision:

- *'Although entitled "the Mayor's vision for London" (and the first steps to achieving a vision admittedly have to start somewhere), this section could*

*nevertheless be described as being optimistic in the extreme and some would say totally unrealistic and undeliverable. This vision paints a utopian view of what the Mayor would like to see, but which would cost a fortune and take years to achieve.'*

## **Chapter 4**

This chapter contains the key proposals and policies that will turn the Mayor's vision into a reality. Overall there is support for it, though some participants note that it is difficult to read, given the density of material covered, and some are concerned about the differentiation between policies and proposals, and the connection between those and the linking text.

### **4A: Framework for Policies and Proposals**

The main thrust of the comments is that:

- The policies and proposals are commendable.

However,

- There are serious comments about:
  1. How and
  2. If they can be achieved and
  3. The resource implications.

Stakeholders want to see more detail on:

- Costs
- Timing
- Infrastructure
- Resources and
- Markets.

### **4B: Waste minimisation and recycling versus incineration**

Several participants point out that the section heading poses a false dichotomy: that these two approaches to dealing with waste should not be in competition – we are going to need them both. Some feel there is a danger of the overall Strategy being sidetracked by a discussion of the pros and cons of incineration.

This debate is also fuelled by uncertainties in what can actually be achieved by minimisation and recycling. There is also concern about the time lag between implementing a policy and discovering if it is working compared to the need to plan well ahead if we are going down the incineration route. One example of this:

- *'The presumption against incineration (Proposal 13) does not recognise that incineration has a role to play in conjunction with reduction, re-use and recycling. Landmark targets should be set to demonstrate that recycling measures will be sufficient to achieve the statutory targets during the period to 2005. The lead-in and planning processes for new incineration plants should not be delayed until 2005 if the targets are not met and there is a real need for disposal capacity other than landfill.'*

### **4C: Waste reduction and reuse**

There is general recognition that waste reduction is very important and needs a combination of public awareness and education with concrete steps to achieve it, but

many participants raise doubts about the practicalities and want to see more detailed and operational ideas such as the use of financial incentives. Some people also feel that the producers of materials that end up as waste, i.e. manufacturers and retailers, will need to be involved in this issue.

Stakeholders also emphasise the sheer scale of the problem of trying to minimise waste in a throw-away consumer society.

#### **4D: Recycling collection**

There is general support for more recycling through both kerbside and bring collection, but there are serious questions about how achievable the various proposals are and around their economic viability.

#### **4E: Composting**

There is general support for more composting but serious questions about how in practice it can be achieved, and also some concerns about health issues associated with large-scale composting.

#### **4F: Recovery**

The predominant feel of comment on this section is that more needs to be done in terms of research into recovery – both into its technical aspects and into the economics of it. Reduction should take priority over recovery.

#### **4G: Landfill**

There is a general recognition that while landfill may still have a role for some time yet, and possibly in the longer term for particular uses, it is not on the whole a long-term option for waste disposal.

This section highlights the way that all approaches to waste are inter-related and can have wider impacts. For example:

- *'The Mayor's presumption against incineration is likely to have far-reaching effects in terms of landfill and may force some authorities into relying on landfill for far longer than they would have done, were there to be fewer barriers to incineration. This will also significantly increase Authorities' exposure to landfill tax, thereby potentially impacting on their ability to provide other services.'*
- *'We would encourage the Mayor to lobby government to increase the landfill tax in order to encourage recycling. At around £25 per tonne the UK currently enjoys significantly lower landfill costs than other European member states who, in turn, demonstrate higher recycling rates.'*

#### **4H: Reuse and Recycling Centres**

The re-branding involved in creating such Centres out of the old Civic Amenity Sites is generally and enthusiastically welcomed even with some concerns about the costs of doing so. An additional concern is the effect this could have on small businesses and even charity shops operating in this area.

#### **4J: Street Cleansing and Litter**

This section raises the question of the responsibility of individuals for dealing with their own waste,

- *'The linkage between high standards of street cleansing and greater responsibility of individual residents/citizens to minimise and control their own waste stream is vital.'*

On-street recycling facilities are mentioned as one option to help citizens dispose of their waste responsibly. There is recognition, however, that even where there is legislation and facilities are available to control litter, such as for fly-tipping and abandoned vehicles, enforcement remains a problem.

#### **4K: Hazardous waste**

There are few comments on this section, but those there are favour a stronger and/or more material-specific approach to this subject.

- *'A more beefed up approach'*
- *'CFCs should be mentioned either here or in WEE section - especially issue of insulation foam.'*

#### **4L: Waste Electrical and Electronic Equipment**

The general thrust by the few participants who commented on this section is that more responsibility needs to be placed on producers.

#### **4M: Clinical waste**

There are few comments here, but this one summarises the general tenor of them:

- *'In principle the policy of ensuring that all waste collection authorities make all necessary arrangements to manage clinical waste associated with municipal waste arisings in London to a high standard is commendable. However, the proposal for providing a free clinical waste collection service to a high standard would be difficult to achieve, primarily due to the limited disposal options for clinical waste as well as the cost.'*

#### **4N: Education and promotion/Awareness of waste and recycling**

There is general recognition of the importance of this topic and support for the ideas in the Draft Strategy, and some feel it needs even more emphasis:

- *'Education and promotion is a key issue and should have a higher profile in the document. It is important that the public is informed of waste management issues within their area and that they are involved in the decision-making process as early as possible.'*

Several participants stress the need for more specific plans on this point.

#### **4P: Leading by example**

The importance of this is agreed and the lack of such leads lamented:

- *'There is a remarkable lack of such leads at present. We agree that much is needed to be done in making green procurement policies generally acceptable.'*

A couple of participants made points about the economics of recycling, for example that recycled products are more expensive than 'new' products, and that savings on waste disposal are not considered when buying goods.

#### **4Q: Markets**

The importance of this subject is recognised, as are the complexities such as categorising recycled materials; finding new uses for recycle; the question of whether to diversify into new end uses or continue with traditional recycling paths; and whether or how to replace spot markets with long term stable markets:

- *'Markets have to be made. The biggest problem in the past has been a lack of imagination and attempting to recycle materials back for remanufacture into*

*the same materials again.... Recycled products must be cost competitive and not rely on the feel-good factor for sales.'*

#### **4R: Planning the waste infrastructure in London**

While there are a number of comments on the provision of specific facilities, more touch upon the overall Draft Strategy. There is support for what is suggested, though some would like it to go further:

- *'The Mayor's Draft Strategy does not provide clear guidance on the Mayor's intention to take over the role of Waste Planning Authority London-wide. There is a need to acknowledge that the proximity principle is not confined by London boroughs, especially outer-London boroughs who could seek to develop partnerships with immediate neighbours which could offer the best practical environmental option.'*

#### **4S: Transport of waste**

There is agreement that the impact of the transport of waste should be minimised, with some debate over whether or not river transport should be encouraged.

#### **4T: Costs and Funding Opportunities**

The main points made here argue that funding and resources need to be made available to deliver the Strategy, for example:

- *'It is vital that sufficient funding is made available to make the future targets achievable rather than aspirational.'*

Several participants mention the lack of sufficiently detailed costing in the Strategy. Some participants express concern that neither taxpayers nor those they elect would ever choose to spend enough money to ensure waste is more sustainably managed because there are always more pressing priorities.

#### **4U: Waste Collection and Disposal Contracts**

There is little detailed comment on this section. There is a comment that

- *'The Policies and Proposals in this Section are very aspirational, but appear short on practical application. The proposed model condition is supported which should establish risk and reduce costs. In addition standard specifications could be developed at least in terms of standardising of items as in civil engineering contracts, allowing direct cost comparison and ease of tendering.'*

Policy 45 attracts a number of comments, for example:

- *'Most existing waste collection contracts (certainly outside London) are based on the number of households or number of people served. New collection contracts as well as disposal contracts must be based on the tonnage collected as determined by weigh bills etc. This will then enable the authorities to divert money from waste collection to pay for source-separated kerbside collections...'*
- *'This policy should be amended to reflect a longer period of review for disposal contracts, which include the development of new facilities.'*
- *'Provided these are reviews of continuing contracts I see no problem but some at the seminar on 25 Sept [Association of London Government seminar on the Draft Strategy] seemed to think this meant contracts terminating after 3 to 5 years, which would be far too short.'*
- *'...it is crucial for contracts to be reviewed every few years to allow flexibility. Long-term contracts with minimum tonnage are completely unacceptable.'*

#### **4V: Joint Municipal Waste Management Strategy Guidelines**

There is general support for what is suggested here, such as:

- *'We support the Mayor's proposal to encourage London authorities to work closely together. We believe that it is particularly critical as far as packaging waste is concerned to get large scale efficiently run schemes which need co-operation between boroughs on collection and sorting infrastructure.'*

One area of concern:

- *'I don't think it is good enough to leave it to the Unitaries to "do their own thing" as to groupings. If nothing else the Mayor should give serious consideration to the merits of grouping or not grouping the unitaries.'*

#### **4W: Long term measures and legislation changes**

This section attracts some detailed comment on specific proposals and policies. On Proposal 103 in particular, the establishment of a single London Waste Disposal Authority, opinion ranges from strongly in favour to strongly against, with a small majority against and several ambivalent. For example:

- *'Establishment of a single London Wide Waste Disposal Authority is not supported. The past records of individual unitary authorities have proved to be superior to the joint authority support. The role of the GLA and the Mayor should be to set the strategic priorities for London and this could include becoming the Waste Planning Authority. Operational issues should be left at a borough level although the need for complimentary strategy between neighbouring boroughs is fully recognised.'*
- *'The establishment of a Single London Waste Disposal Authority (Policy [sic] 103) is fully supported. It is suggested that thinking here should be more radical and encompass the possibility of a Single Collection and Disposal Authority with direct user charges...'*
- *'The council recognises that the current arrangements, in statutory waste disposal authority areas, of three tiers of local government are not satisfactory, but it remains to be convinced that a single LWDA needs to be established....'*

#### **Chapter 5: Implementation and Monitoring Progress**

There are few comments on this section apart from the request for a detailed action plan with timing and responsibilities, and a request for research and feedback from other cities across the world. However, it should be noted that concerns about implementation and practicality are spread throughout the document and should be considered among the key issues of concern.

#### **Appendices 1-10**

There are virtually no comments other than detailed data from one participant on Appendices 1-3, and a reminder about the importance of public health issues at Appendix 7.

#### **Final Comments**

A number of participants express their appreciation of the opportunity to comment on the Draft Strategy, with some commenting on the need to reduce its overall length and density. Others make additional points on a number of topics ranging from the absence of sufficient mention of community recycling to the reaction of visitors to SELCHP.