

CHARTERED INSTITUTION OF WASTES MANAGEMENT

CIWM's Response to the
Review of England's Waste Strategy May 2006
Compared to
Waste Strategy for England 2007

June 8th 2007

CIWM Response to England's Strategy Review Consultation May 06	Waste Strategy for England 2007
<p>CHAPTER 1 The Background</p> <p>A disappointment that it is not an actionable Strategy. Even allowing for the fact that this is an interim review it remains too aspirational. It identifies high level direction but not the actions to achieve them, it is short on delivery.</p>	<p>Implementation plan mentioned and tabled at the back of document pp 113-123 – includes key actions, timeframes and responsibility. A tracking process using national level indicators.</p>
<p>CHAPTER 2: The Vision</p> <p>Recycling & recovery targets <i>Q2. What are your views on proposed national household recycling and composting targets and the level they should be set at?</i></p> <p>Targets should ultimately put local authorities in a position to achieve the objectives of the landfill directive and to meet LATS, Best Value and other targets. At present some of these targets are potentially conflicting as Government strategic objectives are refined. Local authorities want stability; know the timetable for appropriate targets and to be assured that they have the resources to achieve them. Even ambitious 50% recycling targets will leave large quantities of 'residual' waste which must be treated further.</p>	<p>New target to reduce the amount of household waste not re-used, recycled or composted by 29% (15.8 million tonnes) by 2010 and aspiration of 45% (12.2 million tonnes) by 2020.</p> <p>Higher national targets set for recycling, composting household waste 40% for 2010 45% for 2015 50% for 2020</p>
<p><i>Q3. What are your views on setting municipal waste total recovery targets?</i></p> <p>Supports this proposal (see annex 2 Table 5.2 'Targets'). Municipal waste recovery targets provide authorities with the opportunity to collect waste streams other than household. Criticisms of the original strategy in that municipal and commercial waste streams could be integrated. The move towards recovery targets rather than specific targets for recycling and composting puts the emphasis higher up the hierarchy rather than being too focused on landfill diversion.</p>	<p>Recovery of municipal waste 53% by 2010 67% by 2015 75% by 2020</p>
<p>Landfill targets <i>Q4. What are your views on proposed targets for the landfilling of commercial and industrial waste and the level they should be set at?</i></p> <p>Asked previously above.</p> <p>Targets could be considered to influence commercial and industrial waste production and management. (See annex 2, table 5.2 'Targets')</p>	<p>Govt shortly set new national target for reduction of commercial and industrial waste going to landfill.</p> <p>Govt considering halving construction, demolition and excavation wastes to landfill by 2012.</p> <p>Govt considering landfill restrictions for biodegradable wastes and recyclable materials. Pg. 39</p>

<p>CHAPTER 3 The Policy Framework</p> <p>The regulatory framework</p> <p>Q5. <i>What further specific improvements, if any, would you like to see to the regulatory framework?</i></p> <p>Look forward to the results of the environmental permitting programme review and outcomes. Particularly with regard to the future permitting of transfer and sorting facilities, technical competence as well as permits and licenses for the smaller scale or less potentially damaging treatment technologies.</p>	<p>The Environmental Permitting Programme aims to modernise waste management licensing processes and will contribute to the Environment Agency's strategy to modernise its approach to environmental regulation. Its first phase, due to come into effect in April 2008, will integrate the waste licensing and pollution prevention and control permitting systems, leading to a more streamlined approach which is estimated to save industry and regulators some £90 million over ten years.</p>
<p>Producer responsibility & voluntary action</p> <p>Q6. <i>What scope is there for extending the 'stewardship' or responsibility of producers and retailers for the impacts of the products they manufacture and sell, and which key products or sectors should be explored?</i></p> <p>See previously</p> <p>What we need now is to properly implement the existing responsibilities and to refine their implementation</p> <p>Further scope for 'producer responsibility' does exist and should be considered at a national and EU level, including mineral oils and items of household hazardous waste. Linked to Q7 these could involve voluntary as opposed to statutory mechanisms, but impacts will vary.</p> <p>Courtauld Commitment. Scope may exist to extend this sort of commitment to the wider retail sector.</p>	<p>Taking forward voluntary agreements with relevant producers in order to increase separate collection, recycling and recovery of potentially hazardous household wastes. Pg 39.</p> <p>Statutory producer responsibility scheme for non-packaging farm plastics in 2008. Pg 49.</p> <p>Statutory producer responsibility system for managing waste batteries by Sept 2008. Pg.52.</p> <p>Extended Courtauld Commitment to non-food retailers. Pg. 52.</p>
<p>Q7. <i>What are your views on seeking voluntary agreements as an alternative to statutory approaches?</i></p> <p>Voluntary agreements can only go so far, they are after all non-binding and must be entered into with the firm understanding that statutory targets will be progressively introduced and increased if voluntary arrangements fail to deliver.</p>	<p>See above Q6.</p>
<p>An effective pricing framework</p> <p>Q8. <i>How effectively do current prices drive the behaviour of those involved in preventing, producing or managing waste?</i></p> <p>See previously mention of landfill tax, aggregate tax etc (see annex 2, table 5.2 'Economic and financial issues').</p> <p>Also DVC mentioned previously.</p>	<p>Increased landfill tax escalator.</p> <p>Household incentives scheme – consultation issued. Pg. 33.</p>

<p><i>Q9. Are there further tradable allowance (or other) schemes that could be developed to help the market deliver environmental outcomes more efficiently?</i></p> <p>CIWM would like to see a more positive role for the combustible element in the waste stream after recycling and reuse to be utilised in energy from waste plants.</p> <p>CIWM supports the recent amendments to the Renewables Obligation which allow EfW facilities producing heat to qualify for Renewable Obligation Certificates but would like to see other financial mechanisms put in place to further support the development of all waste treatment facilities.</p>	<p>Reform of the Renewables Obligation consultation issued with Energy White Paper.</p> <p>Enhanced capital allowances for investment involving the use of secondary recovered fuel (SRF) for combined heat and power. Pg. 33.</p> <p>ROCs for AD. (Energy White Paper).</p>
<p>Individuals</p> <p><i>Q10. Should there be greater effort to encourage waste prevention and minimisation relative to recycling and, if so, how should this be done?</i></p> <p>Excellent work in recycling must not be confused with waste prevention. The Institution would like to see a similar national programme of waste prevention to change behaviour, as outlined in the Thematic Strategy on Waste Prevention and Recycling.</p> <p>By and large it is more effective to provide recycling opportunities for the householder rather than try to educate them in waste prevention measures despite waste prevention being at the top of the hierarchy.</p> <p>More needs to be done in publicity campaigns to raise awareness. Strategy must be accompanied by comms plan.</p>	<p>Proposals for higher packaging recycling targets beyond the EU 2008 targets. Pg. 51.</p> <p>New products and materials unit if Defra. Pg. 51.</p> <p>Launch of zero waste places initiative for cities, towns and rural communities. Pg 96.</p> <p>Reducing excess packaging by setting optimal packaging standards for a product class. Pg. 51.</p> <p>Developing an opt-out for unaddressed mail. Pg. 51.</p> <p>Recycling bins in public places. Pg 98.</p> <p>Raising awareness with continued campaign for recycling and extend to prevention. Pg. 95</p>
<p>Business</p> <p><i>Q11. How can businesses be engaged in their capacity as purchasers and providers of services?</i></p> <p>Some LA members would like to do more with the retail sector to increase recycling and to adopt more sustainable waste management approaches but they require a greater steer from Government to the retail sector to achieve this.</p> <p>Engagement of businesses depends upon awareness raising eg CIWM's WAC, EA's NETREGS.</p> <p>Short term, preferred option is to continue to fund awareness raising progs for the business sector through Envirowise, Business Link and BREW, subject to clear programme objectives and reporting of programme performance.</p>	<p>Govt continue to support a range of initiatives (BREW and NISP etc) to help develop re-use and re-manufacture. Pg. 60.</p> <p>Promote more strongly the Regional Development Agencies' role in resource efficiency and waste management. Pg. 91.</p>

<p>There remains concern that SMEs in particular often remain unaware of their obligations, real, current and future waste costs and sources of information and advice.</p>	
<p>Government leadership by example <i>Q12: What more can the Government do to provide an example in its own waste management and product procurement policies to reduce waste and waste impacts?</i></p> <p>See previously.</p> <p>Public sector leadership in 'green' procurement is vital, both in terms of their significant purchasing power and environmental impact, and as a clear example to others.</p> <p>Government should do more to publicise what it is doing in this area by way of an example to others, and as a statement of its commitment.</p>	<p>Government's own waste. New Targets for Government departments to reduce waste and increase recycling.</p> <p>Reduce arisings by 5% by 2010 relative to 04/05. Reduce arisings by 25% by 2020 relative to 04/05. Increase recycling to 40% by 2010 Increase recycling to 75% by 2020. Pg 101.</p>
<p>Evidence for development of future policies <i>Q13: What are the information gaps requiring waste management related research in the short and long-term?</i></p> <p>Historically there seemed to be little coordination of all of these funding sources therefore elements of duplication and obvious inefficiencies. Priorities for R&D are in new Defra led arrangements. Eg Defra Waste and Resources Research Advisory Group.</p>	<p>Waste and Resources Evidence Strategy for 2007 – 2011.</p>
<p>CHAPTER 4 Waste Prevention in the Context of Sustainable Consumption and Production</p> <p>Prioritisation for effective policy intervention <i>Q14: What products and materials do you consider should be priorities for action to reduce waste and waste impacts?</i></p> <p>WRAP identified some priorities for final products and materials for increased action. Looking at the principal waste streams in terms of their size and potential impact.</p> <p>EA work on protocols for specific waste streams, funded through BREW.</p> <p>Producer responsibility has identified that certain waste sectors will be prioritised through legislation so to some extent these areas have been identified. (See Q6 above).</p>	<p>Priority waste materials identified on the basis of evidence on potential reductions of greenhouse has emissions resulting from landfill and increased recycling and recovery.</p> <p>Priority product groups identified on the basis of waste impacts, including whether they contain priority waste materials or hazardous materials.</p> <p>Paper, food and garden, aluminium, glass, plastics, wood and textiles.</p> <p>Putting in place an operational protocol for anaerobic digestate developed by the EA by spring 2008. Pg. 71. Pg. 79.</p>

<p>Waste within a coherent 'product life-cycle' policy <i>Q15: What is the scope for reducing waste and achieving more efficient resource use at the product design phase?</i></p> <p>White goods and vehicle manufacturing show that component parts can be identifiable, dismantled and reused. Many packaging systems have been very successfully reduced over many years.</p> <p>Considerable potential remains but needs to be supported through much greater awareness, information and reliable, usable life-cycle analysis tools.</p>	<p>Eco-design of Energy Using Products (EuP) Directive – implementing measures that consider the waste impacts. Pg. 51.</p>
<p><i>Q16: What is the scope for improving the amount of waste-related information provided about products placed on the market?</i></p> <p>No limit to the scope for improving the amount of information available in the market place, for example energy and water efficiencies have been displayed on white goods for years. This and similar information should be more readily available through declared environmental labelling.</p> <p>To encourage positive recycling there should be clear and concise instruction on goods as to how they should be disposed of if they cannot be re-used or recycled.</p>	<p>Related to Q 15 above.</p>
<p>Product and resource re-use <i>Q17: What are your views on how re-use and re-manufacture could be stimulated further?</i></p> <p>See question 16 above.</p>	<p>Govt continue to support a range of initiatives (BREW & NISP) to help develop re-use and re-manufacture. Pg. 60.</p>
<p><i>Q20: What role should Business Links, local authorities or other organisations play in engaging small businesses?</i></p> <p>BREW funded initiatives regarding waste prevention, providing SMEs with information and stimulating best practice are fully supported by CIWM. Business Links and other orgs are involved in some of the programmes that Envirowise and NISP are engaged in. (An extended local authority role is explored under questions in Chapter 5).</p>	<p>Defra is working to further improve the outcomes from the BREW programme by extending the existing monitoring and evaluation methodology and setting clearer strategy for the programme's activities. Pg. 81.</p>
<p>Extending the sectoral approach: producer responsibility <i>Q21: What are your views on developing a sectoral approach to waste prevention including setting waste reduction targets?</i></p> <p>CIWM favours a sectoral approach to waste prevention.eg.reduction targets for C&l wastes.</p>	<p>Govt considering halving construction, demolition and excavation wastes to landfill by 2012. Pg. 69.</p>

<p>Despite the comment made earlier in the consultation document about not setting a recycling target for these wastes, due to lack of sufficient information and evidence, (see paragraph 32, chapter 2), there should be a role for such targets.</p> <p>Definition of terms: Section is riddled with references to both prevention and reduction. The document should state at the outset what each of the terms means in the context of their use. Consistent use of terminology is vital to avoid confusion and gain participation.</p>	<p>Voluntary agreement to reduce plasterboard waste to landfill and increase collection and recycling. Pg. 69.</p>
<p>Reducing environmental impacts of consumption <i>Question 22: How do we best engage consumers to reduce waste?</i></p> <p>See question 10</p>	
<p>CHAPTER 5 Recovering Resources from Waste</p> <p>Local authority performance <i>Q23: Should we set future statutory performance standards for Local Authorities related to recycling and composting household waste and how far ahead should any future targets be?</i> See previously</p> <p>Statutory performance standards should be set, monitored and reviewed on at least a rolling 5 year programme.</p> <p>Resources needed to achieve demanding targets must be recognised and planned for and the penalties/consequences of failure to deliver must be made clear.</p>	<p>The Government is developing proposals for local authority waste performance indicators to be included in the new performance framework. Pg. 86.</p>
<p><i>Q24: What are your views on the possible changes to the design of the standards suggested above?</i></p> <p>Incentives for reducing waste production must be supported. This may result in the collection of more waste.</p> <p>More prominent role for home composting to remove a huge proportion of organic waste from the system' and thus reduce the cost of collection, treatment, and subsequent recovery or disposal or application to land. This would benefit the whole all but is not encouraged at present because it doesn't contribute to output targets.</p>	<p>CPA to CAA consultation on local authority standards for performance.</p>
<p><i>Q25: What are your views on the possible changes to how standards should apply to local authorities suggested above?</i></p> <p>Bearing in mind the pressures on local authorities, setting a minimum performance standard and expecting other drivers to encourage authorities to</p>	<p>Related to Q 23 and Q24 above.</p>

<p>achieve more seems a little naive. Similarly making special arrangements in two tier county areas would achieve an overall target however; it may give rise to serious imbalances between the performance of neighbouring authorities.</p>	
<p>Impact on the management of waste further up the hierarchy <i>Q 26: Do you have any comments on the proposal to encourage the diversion of wastes from landfill to Energy from Waste?</i></p> <p>CIWM urges Government to recognise the important contribution of energy from waste in addressing these issues and to take urgent practical steps to support its expansion. A copy of CIWM's Position Statement on EfW is available on the web site.</p>	<p>Enhanced capital allowances for investment involving the use of secondary recovered fuel (SRF) for combined heat and power. Pg. 33.</p> <p>Energy from waste is expected to account for 25% of municipal waste by 2020 compared to 10% today but less than the 34% by 2015 anticipated in 2000. Pg. 71.</p>
<p><i>Q27: Of the two main current Energy from Waste technologies – i.e. a) MBT/RDF and b) direct incineration – is there any reason to prefer one over the other), and if so, why?</i></p> <p>Clarification from the outset that the preferred technology should only be to treat <i>residues</i> after prevention, recycling, reuse etc. This question links to the answer to question 26 but CIWM does not have any preference, provided the waste goes to an appropriate facility which can utilise the energy and preferably heat from the combustion process that can cope with a heterogeneous waste stream which will also vary with time and therefore must be tried and tested, durable and reliable.</p>	<p>Energy market for wood that cannot be reused or recycled. Pg. 71.</p> <p>Greater support for AD, gasification and pyrolysis. Pg. 77.</p>
<p>The future of landfill <i>Q28: Should landfill eventually be the home of last resort taking only non-biodegradable residues from waste treatment?</i></p> <p>This has been highly successful elsewhere in Europe but we are some way from that situation in the UK. Too early to take steps such as banning a range of materials and products from landfill or seeking to end its use altogether. Until there is an adequate series of facilities in the UK it is not appropriate to ban a wide range of materials from landfill. Depending upon progress made in meeting 2010 and 2013 LFD targets future bans/pre-treatment criteria could be considered at both EU and national level.</p>	<p>Govt intend, subject to further analysis, to consult on whether the introduction of further restrictions on the landfilling of biodegradable wastes and recyclable materials. Pg. 47.</p>

<p>Procurement of waste management services <i>Q 29: Views are invited on the proposed actions to improve the waste procurement and how to take them forward.</i></p> <p>Proposals need to be much firmer, for example an expectation that regional and local planners “should be prepared to work with industry to ensure.....” is a good objective but will not give industry the confidence to invest or a clear enough steer to the public sector regarding what they are expected to do.</p> <p>Planning, from strategy development to individual planning development control decisions, is still viewed by CIWM members as the most significant medium term barrier to progress.</p>	<p>Ensuring that regional spatial strategies and local development plans conform to national planning guidance on waste so that the waste infrastructure projects needed to deliver this strategy receive planning approval. Pg. 71.</p> <p>Improving procurement and investment by local authorities through comprehensive support and strengthened central and regional co-ordination by WIDP. Pg. 71.</p> <p>Govt now discourages integrated contracts which bundle together collection, treatment and other services unnecessarily. Pg 81.</p> <p>Social clauses included in the procurement/contract and Office of Third Sector commissioning work increase evidence and spread experience. Pg. 81.</p>
<p>Delivering the market capacity for recycled materials <i>Q30: What more could the government do to accelerate the development of markets for recycled materials?</i></p> <p>The Government should continue to invest in WRAP’s core function, to develop markets and to encourage green procurement.</p> <p>See previously for When waste ceases to be waste and could be considered to be fully recovered. Quality protocols, Review of Waste Framework Directive</p>	<p>Supporting domestic market development for high quality uses of materials and resources and creating a centre of expertise on export markets. Pg 71.</p>
<p>Imports and exports <i>Q31: How can we improve compliance with the controls that apply to the export of waste for recycling?</i></p> <p>Quality protocols for exported recyclables/recyclates must be clarified as soon as possible. Backed by a regulator capable of policing these standards.</p>	<p>Import and Export Plan as well as Transfrontier Shipment regulations.</p>
<p><i>Q32: What should the balance be between the development and encouragement of domestic capacity for recycling and the reliance on overseas markets?</i></p> <p>Growing global materials markets and their importance in achieving material recycling/reuse targets are important but should be tighter regulation, enforcement of existing regulations and</p>	<p>Supporting domestic market development for high quality uses of materials and resources and creating a centre of expertise on export markets. Pg 71.</p>

<p>to ensure that only appropriate materials are exported for recycling and not for ultimate disposal elsewhere.</p> <p>'Domestic' reprocessing capacity also needs to be encouraged to support environmental technology and service development, to avoid over reliance on potentially volatile overseas markets and to support more local resource markets.</p>	
<p>Commercial and industrial waste <i>Q33: How can we encourage more recycling and recovery of commercial and industrial waste?</i></p> <p>Recycling and recovery targets on C and I waste.</p> <p>See previously</p>	<p>Govt shortly set new national target for reduction of commercial and industrial waste going to landfill.</p> <p>WIDP aims to ensure that full opportunity is taken to achieve synergies between municipal and other waste treatment. Pg. 75.</p>
<p>Construction and demolition waste <i>Q34: What more should we do to encourage reduction, recycling and recovery of construction and demolition waste?</i></p> <p>More research is needed on the real impact landfill tax and the aggregates levy is having on this performance and opportunity exists to review both financial instruments upwards.</p> <p>Further initiatives including Site Waste Management Plans, the Code for Sustainable Homes and other industry best practice codes (eg WRAP/EA recovery protocols and specifications for use) will all contribute to prevention, reuse and recycling.</p>	<p>Govt considering halving construction, demolition and excavation wastes to landfill by 2012. Pg. 69.</p> <p>Voluntary agreement to reduce plasterboard waste to landfill and increase collection and recycling. Pg. 69.</p>
<p>Small and medium sized enterprises <i>Q35: What are the current practical and cost barriers to recycling SMEs?</i> See Q36</p>	
<p><i>Q36: What might business and commercial providers do to overcome these barriers and how could the government support them?</i></p> <p>This could be helped by cooperation between businesses to provide joint facilities and contracts, with appropriate support through eg Chambers of Commerce and BREW programmes such as NISP.</p> <p>A supportive regulatory regime including permit exemptions for small facilities may also be needed.</p> <p>Another significant barrier is the simple lack of information or understanding of the opportunities for the SME sector to recycle or prevent waste and most importantly to fulfil their environmental and legislative responsibilities.</p>	<p>Encouraging local authorities to take on a wider role (in partnerships) to help local (particularly smaller) businesses reduce and recycle their waste. Pg. 83.</p>

<p>Hazardous waste <i>Q 37: Do you think the products in paragraph 87 above are sensible priorities for new producer responsibility initiatives and should such initiatives be voluntary or statutory?</i></p> <p>CIWM would urge this strategy to provide further support in delivering the longer term measures raised by the Hazardous Waste Forum's Hazardous Waste Action Plan for hazardous waste reduction and environmentally sound management.</p>	<p>Govt to continue to pursue policies which lead to reductions in haz waste arisings. EA HAZRED scheme. Pg. 45.</p>
<p>Household Hazardous Waste <i>Q38: Which of the options for household hazardous waste outlined above should be taken forward?</i></p> <p>CIWM welcomes the endorsement of the good practice 'Haz guide' produced by ourselves and the National Household Hazardous Waste Forum and support the contents of the guidance as good practice.</p> <p>As the guidance suggests there should be at least one facility, whether this be a household waste recycling centre or collection service should be available within each WDA. Local authorities should also highlight the service on offer through their web sites and signage at facilities.</p>	<p>Govt encourages all authorities to follow suit and provide separate collection of HHW and publicise the service. Pg. 46.</p>
<p>CHAPTER 6 Roles and Responsibilities <i>Q39: What are your views on the proposed Sustainable Waste Programme Board, and on ways for it to engage with waste stakeholders and the wider community?</i></p> <p>See above CIWM are pleased to see the development of a Sustainable Waste Programme Board but we would like to see the government go further and develop this board into the equivalent of a strategic waste body/authority with the remit of developing national policy and determining waste management infrastructure needs and then overseeing and ensuring the delivery of these policies.</p>	<p>Waste Strategy Board and a Waste Stakeholder Group to be established. Pg. 103.</p>
<p><i>Q40: Do you agree that more emphasis is needed on partnership working between local authorities at the regional and sub-regional level on waste procurement?</i></p> <p>More emphasis on partnership work between local authorities at regional and sub regional level on waste procurement.</p> <p>Joint planning and procurement will be key to success in many areas and good examples of what</p>	<p>Encourage economic regeneration through work with local businesses and RDAs to take advantage of the opportunities for reprocessing of waste into resources. Pg. 89.</p>

<p>can be achieved already exist. Mechanism to allow/ encourage and require joint working must be a priority for the SWPB and its action plan.</p>	
<p><i>Q41: What role should be played by the RDAs and local authorities respectively in developing a more closed-loop resource economy; and what activities should they undertake?</i></p> <p>The link between waste management and the closed-loop resource economy is vital for the future but remain long term objective. Resources have been allocated via the BREW programme expenditure and outcomes need to be closely monitored and reviewed; a job for the SWPB. It is however, increasingly clear that this support and coordination has to be delivered regionally and sub-regionally; making RDAs and Regional Government Offices obvious centres to build around. The funding structure, objectives and performance of these arrangements must be closely managed.</p>	<p>Promote more strongly the Regional Development Agencies' role in resource efficiency and waste management. Pg. 91.</p>
<p>Local level <i>Q42: What are your views on the characteristics for good practice in Local Government set out in Box 2?</i></p> <p>A comprehensive wish list as far as political/leadership is concerned and we need to see much more evidence of these issues being addressed.</p> <p>The mention of variable charging for business waste in this section so that the producer pays is a little surprising, especially as business waste producers already pay, and the lack of any municipal/household incentive charges elsewhere in the strategy.</p>	
<p><i>Q43: How effective have LAs been to date in helping to deliver waste outcomes; and how could partnership arrangements be strengthened for the future at the local or sub-regional level?</i></p> <p>There is a huge variation in collection of both recyclables and residuals throughout the country as there has been in planning and providing treatment and disposal capacity. Most authorities also have to concentrate on targets (LATS and recycling) rather than prevention or reuse. There are huge economies of scale to be made through cooperation and partnership between authorities and in incorporating more than one waste stream, for example taking commercial with household waste.</p> <p>This question cannot be approached outside the</p>	<p>Government is legislation to allow the creation of joint waste authorities through Local Government and Public Involvement in Health Bill. Pg. 87.</p> <p>Waste Infrastructure Delivery Programme (WIDP) will produce a comprehensive package of guidance on inter-authority agreements. Pg. 88.</p>

<p>Lyons Inquiry and much work remains to be done under both this strategy and its action plan.</p>	
<p>Improved integration of municipal and business waste management <i>Q 44: Is there a demand from businesses for increased help from local authorities with recycling services and resource management?</i></p> <p>CIWM believes that many businesses would like more support from local authorities. (Also see the answer to question 35 regarding economies of scale and barriers to SME performance.) Depending on the extended role envisaged local authorities may be in a position to provide this help but they would need to be appropriately resourced.</p>	<p>Facilitate procurement of recycling collection services for businesses and the provision of adequate trade waste sites. Pg. 89.</p>
<p>A strategic role for local authorities <i>Q45: What are your views on the proposed wider strategic role for local authorities and how this could be supported?</i></p> <p>Any expanded local authorities' strategic role must fit within and complement the expanding regional and sub regional coordination suggested elsewhere in this document. It must also be undertaken in close partnership with the private sector who will in many cases deliver services to businesses in their area.</p> <p>Although the role would not require any extension to authorities existing powers it would need additional dedicated staff and resources to progress.</p>	<p>Chapter 6 of Waste Strategy 2007. New powers to form partnerships between LA. Local area agreements. Local Government performance framework (agreed performance package published later 2007) guidance on inter authority working. LA to take wider role with local businesses- more integrated approach. RDAs and the like to co-ordinate business W and R management with LAs and third sector</p>
<p>Local authorities as wider recycling service providers for business waste <i>Q 46: What are your views on placing requirements of this kind on local authorities and/or businesses?</i></p> <p>Local authorities can and do provide support and facilitation. CIWM believes that the onus should be kept on the business itself, and choose whether they undertake it themselves or pay for the service to be undertaken by local authorities, by community and voluntary sectors or other businesses.</p>	<p>Government is encouraging local authorities to use their role as local community leaders in partnership with businesses, other local, sub-regional and regional public sector organisations and third sector organisations to achieve a more integrated approach to resources and waste in their area. Pg. 89.</p>
<p>Local authorities and producer responsibilities <i>Q47: What changes need to be made to ensure better interaction of producer responsibility schemes and local authorities?</i></p> <p>Schemes to operate the WEEE etc need to be made clear. Planning is required when implementing producer responsibility legislation to ensure local authorities and producer schemes are</p>	

<p>in a position to work together. Local authorities must be appropriately funded to enable them to provide the required infrastructure. Eg DCFs for WEEE. For packaging wastes, it is clear that the number of obligated businesses and tonnage of obligated materials grow; compliance will increasingly depend on recovery and recycling of materials from municipal waste. Partnership between compliance schemes/individual business and local authorities will grow; including investment in local authority services and infrastructure.</p>	
<p>Development of the voluntary and community waste sector <i>Q48: What are your views on the approaches above and how the Government can best facilitate a greater contribution by the voluntary and community sector in delivering waste objectives?</i></p> <p>Care needs to be taken to build on achievements of the comm/voluntary sector without introducing unfair competition with commercial services and facilities. Voluntary and community schemes need to be complementary to private sector schemes.</p>	<p>Measures to increase the share of local authority contract work won by the third sector and to make greater use of third sector expertise, particularly to prevent waste, raise awareness, segregate waste at source, and increase re-use and recycling of bulky waste through capacity-building support. Pg. 97</p>
<p>CHAPTER 7 Waste Crime <i>Q49: What additional action is needed either to achieve effective enforcement or to prevent waste crime?</i></p> <p>Additional powers for LAs under CNEA need to be matched with adequate resources. Resourcing is a matter for Defra/DCLG/HMT. Skills should be deliverable through the new flycapture capacity building programme.</p> <p>The EA needs to be fully resourced and skilled to detect, prosecute and prevent environmental crime especially illegal site operations and flytipping and sham recovery.</p> <p>Both local authorities and the EA need to be supported by training of magistrates to ensure penalties imposed match the seriousness and profitability of the crimes.</p>	<p>Annex F Action Plans Explains government review, legislation, powers of regulators, Duty of Care, Transfrontier Shipment, export and import, CNEA, SWMP and Flycapture.</p>
<p><i>Q50: Is there evidence to link the types and quality of local waste collection services and general cleanliness to levels of fly tipping? What changes can be made to service provision that will reduce fly tipping?</i></p> <p>In general wherever a comprehensive provision of waste management services is available, the general level of cleanliness is better and the level of fly-tipping lower than in authorities of a similar profile but with a less comprehensive suite of</p>	

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