



# APSE response to 'Towards zero waste'

This briefing provides details of APSE's response to the Welsh Assembly Government's consultation on the 'Towards zero waste' strategy. This briefing is provided to local authority chief executives, council leaders and all APSE waste contacts in Wales and to England, Scotland and Northern Ireland contacts for information.

## Key Issues:

- This APSE briefing includes APSE's response on the Welsh Assembly Government's proposed new waste strategy for Wales
- APSE supports the overall goal of reducing waste, although the briefing paper highlights areas where further guidance or clarification is needed
- There will be further sector plans issued including one on municipal waste

## 1. Introduction

The draft strategy aims to build on the successes of 'Wise about Waste – The National Waste Strategy for Wales' and set out a long-term strategy for waste management and resource efficiency – from now until 2050. It highlights the challenges we are facing in terms of sustainability and tackling climate change and sets out what the strategy means for businesses, communities, Government and the public sector. The full consultation is available by clicking on the following link: <http://wales.gov.uk/docs/desh/consultation/090429wasteconsultationen.pdf>. This is a high level strategy which will ultimately be accompanied by a series of sector plans on municipal waste; construction and demolition; retail; waste management, infrastructure and markets; and others. The remainder of this briefing replicates APSE's response to the consultation.

## 2. APSE response to the Welsh Assembly Government

The Association for Public Service Excellence (APSE) represents officers and members involved in the management and provision of quality public services. APSE's mission statement positions the organisation as 'networking organisation which consults, develops, promotes and advises on best practice in the delivery of public services'. APSE is currently working with almost 300 authorities within the United Kingdom and all 22 councils in Wales are members of APSE. APSE has consulted with its membership and has included their comments within this submission.

*Question 1: Do you support the strategy's 'zero waste' approach with a long term aim of zero waste and 'one Wales: one planet' by 2050 and a medium term aim of 70% recycling across all sectors by 2050.*

APSE is committed to climate change and sustainability. Climate change represents the most important challenge to our environment, economy and society and APSE believes that local government has a leading role to play in combating climate change and building a more sustainable future for our communities.

Local authorities have already made significant progress in increasing recycling. APSE's UK-wide local government benchmarking service, performance networks, shows that the average percentage of total waste collected which is recycled has improved significantly since 2001-02 from 9% to 34% in 2007-08 whilst the percentage composted (PI 12b) has gone up from 9.81% to 11.74%.

APSE supports the Assembly's goal of reducing waste, although thinks that the proposals contained in the strategy could leave us unable to achieve these laudable aims of zero waste. The achievement of these aims needs to be supported by tackling packaging at the front end and enforcing producers to redesign their products or make products that can be reused or recycled. This would help in reducing the burden on municipal waste at source.

It is difficult to fully comment on the strategy fully in the absence of the sector specific plans and APSE would welcome being involved in and consulted on the development of these sector plans, in particular the sector plan relating to municipal waste (email: [djohns@apse.org.uk](mailto:djohns@apse.org.uk)).

There are some concerns on how these changes in waste management required to deliver the strategy are going to be financed, in addition to the need to obtain additional data to support the reporting needed for ecological footprinting. There are other targets that local authorities are working towards, specifically on efficiency savings which will obviously negate against procurement of expensive new methods.

The requirements for the waste sector and waste composition may change by 2050 so flexibility needs to be built into the strategy to account for this.

*Question 2: Do you support the development of sector plans? Are there other sectors that need to be covered? Sector plans will be the main delivery documents for implementing this high level strategy, and will be subject to a separate consultation exercise.*

APSE supports the development of sector plans and welcomes the approach that the Welsh Assembly Government has taken on tackling the whole supply chain. The recognition that no one body can achieve this alone is encouraging.

APSE would welcome the release of these plans sooner rather than later so that they don't become disjointed from this current consultation exercise. Many local authorities across Wales have already developed and/or implemented plans and have concerns on how the outcome of the sector plans will affect these. APSE believes that local authorities should be given flexibility in how they achieve targets set in terms of waste minimisation and recycling. Methods used by different councils will vary greatly according to local circumstances and demographics.

APSE would welcome clarity in the sector plans on what targets relate to local authorities and which ones relate to businesses as local authorities should not be held accountable for issues outside their control.

*Question 3: Do you support the aim of maximising the social, economic and environmental outcomes (sustainable development) through delivery of the strategy? Are you happy with the headline indicators?*

APSE fully supports sustainable development and thinks that sustainability should be central to all local government activities. Well managed public services have a key role in improving the sustainability of their local area. Such services also help to alleviate the conditions which lead to inequalities in the quality of the environment which ultimately impact on the health and well-being of citizens.

APSE would welcome further information on the headline indicators to be able comment fully on these, such as targets, definitions and scope. In addition, further clarity needs to be provided on how ecological footprint is going to be measured at a local level and how this differs from measuring CO<sub>2</sub> emissions.

*Question 4: Massive levels of waste reduction are needed to achieve zero waste and one Wales: one planet levels by 2050. What can the Assembly do to help the different sectors achieve the waste reduction targets set?*

APSE supports the waste hierarchy to reduce, reuse and recycle. However, to achieve large-scale reductions in waste, there needs to be penalties/incentives for producers to reduce packaging. Local authorities should not be held solely accountable for the achievement of municipal targets, as per the admission within the document, "many of the tools needed to achieve waste minimisation to the levels required are not currently in the scope of the Assembly Government". The Welsh Assembly Government need to tackle producer responsibility through education and appropriate enforcement powers as without this, local authorities may not be able to achieve the targets set out in the strategy.

In conjunction with this, there needs to be further behavioural change by households and for local authorities to be given financial support for educational work such as door stepping, leafleting and road shows.

*Question 5: Commercial and industrial: your views are sought on which option to use as a basis for waste reduction targets and why.*

No comment.

*Question 6: Municipal: your views are sought on which option to use as a basis for waste reduction targets and why.*

It is difficult to comment on this based on the need for more detail in the strategy in terms of the impact on individual local authorities. It depends on processing capacity to deal with increased recycling, funding, product design changes and behavioural change from citizens.

*Question 7: Reuse target: this reuse target will be predominantly achieved through the reuse of furniture. Your views are sought on whether this target should be higher. If so what other materials could be reused to achieve the higher target?*

Feedback received by APSE indicates that many local authorities are not in favour of the introduction of a municipal reuse target as it would introduce another layer of targets and could result in local authorities collecting additional waste merely to achieve targets. The third sector has developed the reuse infrastructure and local authorities could direct residents to local reuse groups.

*Question 8: Construction and demolition: your views are sought on which option to use as a basis for waste reduction targets and why.*

It would be helpful to provide a breakdown in this section on what proportion of this relates to local authorities as well as further details on what facilities will be provided for recycling, recovery and reuse of construction and demolition waste. In terms of waste avoidance, this will again rely on changes from suppliers.

*Question 9: Commercial and industrial: which recycling rate is feasibly (70% or 77%) and why?*

No comment.

*Question 10: Municipal: are the targets set for municipal waste recycling and landfill diversion correct?*

The targets set are extremely challenging and feedback indicates that local authorities are concerned over their achievability and financial sustainability. In particular, that the necessary processing capacity and funding are put in place. Authorities would welcome details on how the achievement of targets will be financed beyond 2010-11.

The target for the minimum levels of composting (or AD) of source separated food waste from kitchens of 12% is unrealistic. Feedback suggests that 8% deliverable food arisings in waste streams is realistic. The waste analysis that is currently being undertaken across Wales should inform this debate and APSE is currently conducting a UK-wide survey into food waste and would be happy to share the findings with the Welsh Assembly Government. However, it may be a little premature to have this target before the analysis has been completed. APSE's state of the market research 2008 for refuse collection services found that food waste collections were thought to be the hardest to implement compared to other waste streams such as paper, card, glass, plastics, cans and green waste by local authorities throughout the UK.

The strategy proposes a target of 80% from 2009/10 for a minimum proportion of reuse/recycling/composting that must come from source separation. However, as the strategy is unlikely to be finalised by 2009-10, APSE would encourage the removal of the target. Another concern to local authorities is if the Assembly is stipulating the approach to collection and treatment methods, such as source segregation. This does not lend support to those technologies which are capable of treating and separating the contents of a black bin into its relevant fractions. This creates an anti-competitive market position which is not

helpful to businesses that have developed such practical solutions. In addition, APSE's state of the market research for refuse collection 2008 found that 56% of authorities throughout the UK operate co-mingled collections.

Collection and treatment methods are a local decision made by democratically elected members in consultation with the public and should not be stipulated by the Assembly. The type of collection will depend on local residents, local circumstances and what works in terms of participation and tonnage levels. Further clarity needs to be provided by the Assembly in terms of whether you are proposing that a particular front end collection system is better or if it is meant that kerbside needs to be maintained whatever the method. Fiscal policy will ultimately influence technology used and therefore the types of waste treatment facilities developed.

The draft strategy does not state whether the proposed municipal targets will be statutory or aspirational. However, if these targets are statutory, APSE would welcome a consistent approach being taken with other sectors as well. The achievement of municipal waste targets cannot be entirely accountable to local government.

*Question 11: Construction and demolition: is a 90% target for recycling, recovery and reuse of non-hazardous waste achievable?*

This will depend on the proximity/availability of facilities for recycling, recovery and reuse as well as if markets can be found for the materials.

*Question 12: Does the strategy provide the clarity needed (particularly by industry and public sector) to allow investment in the relevant waste infrastructure?*

APSE believes that additional information needs to be provided by the strategy on the waste infrastructure in terms of types of facilities required. The Welsh Assembly Government needs to consider quickly where the investment will come from as the timescales are tight for meeting these targets. There are also concerns of the risk posed by changes in waste over the coming years, particularly with waste minimisation and whether these targets will therefore be achievable in the longer term.

APSE disagrees that methods of service delivery should be questioned as part of the strategy. The following statement in the strategy is wrong and should be removed:

*"Only two of the twenty-two local authorities in Wales contract out all or most of their environmental services. Although this is not necessarily an issue in itself from either a performance or an affordability perspective, it does contrast with the situation in England, where around 65% of waste collection services are now outsourced to contractors. Given that local authorities in Wales have been subject to broadly the same legislative drivers that led to considerable outsourcing in England, these statistics at least indicate the possibility of failure(s) in the Welsh waste collection market. At the very least this has potentially stifled the development of local waste collection businesses or community enterprises." Page 42*

The issue of method of service delivery, whether this is in-house or externalised, has no relation to the strategy and there is no link between a service being delivered in-house and 'failure' in the waste collection market. In fact, local authorities are increasingly using community benefit clauses to support local suppliers and local employment. Type of service delivery is a contractual arrangement for local authorities to decide on based on quality, service delivery, performance against criteria and cost benefit. APSE believes that it would be

a backwards step to suggest local authorities should outsource their services when trends elsewhere including in England show that councils are increasingly in-sourcing services for value for money and pragmatic reasons. Our recent research which examined the reasons behind the insourcing in more than 50 authorities, found that councils of all political colours are insourcing for reasons that are pragmatic rather than ideological and insourcing is occurring across a broad spectrum of services including: administrative and back office functions, housing benefits, grounds maintenance, street cleansing, refuse and waste. The most quoted reasons for bringing services back in-house were:

- poor contractor performance
- a need to achieve value for money
- poor terms and conditions causing lack of motivation amongst staff
- a need to address poor customer satisfaction levels

The benefits authorities felt they had achieved by bringing services back in-house were improved performance; enhanced governance; cost efficiencies; higher citizen satisfaction; greater flexibility; impact on the local economy; and better service integration.

As the pressure grows on the public sector to deliver better services for less money, it is inevitable that more will come back in-house because of market failures in the current climate, with companies going bust and cost-cutting impacting on service quality. Councils will also require the greater flexibility offered in-house to adapt to rapidly changing circumstances, particularly in the waste and street scene sector. APSE believes that local authorities should, especially within the current financial climate, take a sustainable long-term approach to service delivery based upon continuous performance improvement.

There is also an emphasis in the strategy on the third sector who *“will have a big role to play in the sustainable management of waste reduction, reuse and recycling and the creation of more long term skilled jobs, community ‘buy-in’ and the retention of capital within the Welsh economy”* page 24. APSE believes that the third sector do have a role to play in supporting service delivery as suppliers, additional providers of new or noncore services and where services are struggling to cope with demand. However, their skill set should not be confused with the role of front line service delivery in waste collection, disposal and recycling services.

The strategy also mentions the possibility of charging for residual municipal waste as a means of ensuring householders are more accountable for the amount of waste they produce that they do not separate out for recycling and that options will be discussed during development of the municipal waste sector plan. It is APSE’s view that it is preferable for the Government to tackle production rather than simply penalising householders through regressive charging regimes.

APSE looked at direct and variable charging back in 2007 and proposed an approach based on giving every individual an ‘annual household residual waste allowance’ to overcome the common argument that large families would be penalised otherwise. The incentive would be to dispose of less waste than your allowance rather than to penalise. However, this would need to be accompanied by a major education campaign that informs both businesses and the public how to go about waste reduction, re-use, recycling and composting. Any adopted scheme must also avoid increased pressure on council tax, whilst better reflecting the costs of waste in what citizens pay locally. If charges are administered fairly, householders who are prepared to help tackle climate change by recycling and reduce waste should benefit, while those who disregard the damage caused to the environment are forced to rethink their behaviour or pay more. Any new system of charging also needs to be accompanied by

maximising the use of enforcement powers to ensure that there is no increase in fly-tipping alongside making producers more responsible for the packaging and waste they produce.

*Question 13: Would you like additional waste facilities/services in your area/sector to provide opportunities for local jobs and support the Welsh economy? What facilities/services would you like to see?*

APSE believes that continued support and investment in the public sector infrastructure (such as affordable housing, transport, play and recreational facilities, a high quality public realm and creating sustainable communities) including increased employment opportunities should be the foundation for tackling the recession and supporting the economy. As the recession will be experienced differently in different regions, local authorities should have a key role to play in developing local jobs needed at their local level.

With the introduction of additional waste facilities, community engagement will be key especially with advanced technology solutions such as anaerobic digestion.

*Question 14: What role can you/your organisation play in helping deliver this strategy?*

APSE will continue to work with the 22 local authorities in Wales to share best practice and innovative solutions. In addition, APSE would like to be involved in and consulted on the development of these sector plans, in particular the sector plan relating to municipal waste (email: [djohns@apse.org.uk](mailto:djohns@apse.org.uk)). Local authorities recognise that they have a significant role to play in delivering the strategy but this cannot be done by councils alone and needs appropriate legislation on production if Wales is to achieve the challenging targets proposed in this document.

APSE will continue to examine and promote options aimed at ensuring a sustainable waste industry across the UK.

*Question 15: Given the scale of the challenge, what practical ideas/solutions can you suggest that would help achieve zero waste and 'one Wales: one planet' levels by 2050.*

There needs to be an appropriate legislative driver to make producers more responsible for their waste to make the 70% recycling achievable. There needs to be more focus in the strategy on waste elimination at the manufacturing end rather than a focus on developing solutions at the end of the cycle. Local authorities are at the back end of the waste stream and need the co-operation of trade and industry to achieve zero waste and design out waste from products as far as is reasonably practicable.

The Assembly also need to provide additional funding required to achieve the recycling/composting/waste minimisation targets so that there is more processing capacity locally. There needs to be long-term commitments to funding due to the nature of the collection/treatment facilities needed. This needs to be supported by further education of the public.

Thank you for the opportunity to respond to this consultation.

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