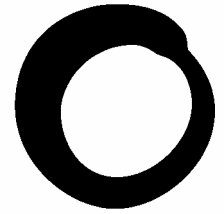


April 2006



**Friends of
the Earth**

Briefing

England's Waste Strategy

A guide to the current consultation

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

Friends of the Earth is:

- the UK's most influential national environmental campaigning organisation**
- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide**
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
- dependent on individuals for over 90 per cent of its income.**

To join or make a donation call us on 0800 581 051

Friends of the Earth, 26-28 Underwood Street, London N1 7JQ

Tel: 020 7490 1555 Fax: 020 7490 0881 Email: info@foe.co.uk Website: www.foe.co.uk

Friends of the Earth Limited company number 1012357

♻️ Printed on paper made from 100 per cent post-consumer waste

Review of Waste Strategy 2000

DEFRA is currently undertaking a review of the waste strategy for England, Waste Strategy 2000, and is running a three month consultation on the review until the 9th May. Friends of the Earth is disappointed by the policies and delivery mechanisms proposed in the review. It is also very concerned that the review supports an increase in incineration, suggesting three times as much household rubbish could be burned in incinerators within 15 years.

Friends of the Earth is calling on the Government to implement a three-step plan to deal with Britain's waste crisis:

1. Reduce the amount of waste generated: the Government needs to set an ambitious waste prevention target and adopt policies to ensure that it is met.
2. Redesign: The Government should put regulatory and financial pressure on manufacturers and retailers to ensure that they design-out waste from their products, or make them recyclable or compostable if prevention is not possible.
3. Recycle and compost at least 75 per cent of England's waste: England currently recycles just 23 per cent of its domestic waste; one of the worst rates in Europe

Such measures would drastically cut the amount of waste produced. Any remaining waste could be further processed before land-filling, to reduce its volume and avoid greenhouse gas emissions from landfill sites.

Responding to the consultation

This briefing outlines the specific policies we want the Government to include in the new England waste strategy. It covers a selection of the 53 questions put forward in the consultation. Please use this briefing as a guide to writing your own response, but please also use your own knowledge and experiences.

Details of how to send your response to DEFRA can be found at the end of this briefing. Friends of the Earth will be sending a detailed response to the consultation, which will be available at the end of the consultation.

Recycling and composting targets

Question 2: What are your views on proposed national household recycling and composting targets and the level they should be set at?

The UK has for many years languished at the bottom of the European recycling league table, relying heavily on landfill for the disposal of waste. However, since statutory recycling targets were set in 2000, many local authorities have made great improvements to their recycling services. Many now recycle and compost around half of their waste - St Edmundsbury has a rate of 50.6 per cent recycling and composting.¹ This is a much higher rate of recycling achieved than the target of 30 per cent recycling and composting by 2005/06 it had previously been set by the Government.

The review of the waste strategy proposes new recycling and composting targets for household waste: 40 per cent in 2010, 45 per cent by 2015 and 50 per cent by 2020. It is good to see higher targets proposed and the much higher levels of recycling found in many other European countries and elsewhere show that these targets are achievable.

For example, the Belgian region of Flanders is already recycling 71 per cent of its municipal solid waste (MSW). Canberra, Australia recycles 73 per cent recycling of the city's total waste. In Kamikatsu, Japan, 75-80 per cent of household waste is recycled or composted.ⁱⁱ

However, these examples also serve to demonstrate that the Government's targets are not ambitious enough. In 15 years England's recycling rates will only have just reached the levels that some European countries reached five years ago.

Ben Bradshaw has said that recycling 60 per cent of household waste is possible so it is disappointing that no target for 60 per cent has been suggested for the new waste strategy.

DEFRA's own Environmental Report that accompanies the consultation documentⁱⁱⁱ shows that a strategy achieving 60 per cent recycling by 2020 would perform better in terms of climate change than the 50 per cent DEFRA chose. It is not clear why the Government has ignored its own environmental report and adopted a target which will have less environmental benefits.

Friends of the Earth believes that in light of this evidence and the recycling rates achieved by other countries the Government should review the long term targets and aim for much higher levels of recycling to build on this momentum. We urge them to make a commitment to high recycling and composting targets for household waste, aiming for 75 per cent by 2015.

However, it will not be possible to reach these high targets without a package of policy measures such as:

- speed up the increase in landfill tax, so that it reaches £35 per tonne more quickly
- extend the landfill tax to cover other forms of residual treatment such as waste incineration
- remove the economic incentives for incineration
- allow councils to introduce variable charging schemes
- ban the disposal to landfill of recyclable and compostable materials by 2010
- implement a national waste prevention target
- extend measures to make manufacturers responsible for minimising waste, reusing materials and recycling.

For more information on these policies please see below.

Extending producer responsibility

Question 6: 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?

Rules that regulate the responsibilities of manufacturers play a critical role in making sure products are designed for re-use and recycling, thereby preventing waste. Producer responsibility agreements need to be extended to reduce waste, increase durability and the use of recycled materials, and increase consumers' ability to reuse and recycle products.

These schemes do create some extra costs for businesses, but the sums are often much smaller than businesses fear. For example, the estimate cost of complying with the packaging regulations range from 0.18 per cent of profit for large firms to 2.2 per cent for small and medium-sized firms^{iv}.

Furthermore, reducing waste and designing products for re-use should actually bring financial benefits to companies in the long term. For example, a report for the England and Wales Environment Agency found that if manufacturers invested in best-practice waste minimisation techniques, they could achieve £2-2.9 billion savings in annual operating costs.^v

Research by Friends of the Earth suggests that changes are more likely to be delivered by statutory producer responsibility targets for businesses than by voluntary targets – partly because of the large number of players in the sector.^{vi} For a number of types of waste, including packaging and tyres, attempted voluntary agreements have been expensive failures, and the Government has ended up having to regulate.

One policy that could be adopted in this area is to give companies such as supermarkets compulsory targets for reducing the amount of waste they produce, particularly waste which cannot be recycled or composted.

Variable charging

Question 9: Are there further tradable allowance (or other) schemes that could be developed to help the market deliver environmental outcomes more efficiently?

Friends of the Earth would like councils to be given the powers to implement charging schemes for householders to encourage waste prevention, reuse, recycling and composting. Charging householders for the amount of waste they put out for disposal has the potential to dramatically change the way individuals perceive their waste production and how they manage it. Variable charging schemes have been implemented in many European countries including Austria, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg and Sweden, and have had a significant impact, increasing recycling by 30-40 per cent.^{vii}

These case studies show that residual waste collected typically falls by 10-25 per cent and often by around 30 per cent with weight-based systems, to below 150kg per inhabitant. In the UK, the average is 400kg per inhabitant.^{viii} In the United States, the amount of waste sent to landfill after introducing variable charging decreased by an average of 40 per cent.^{ix}

To ensure that these schemes can be put in place fairly there need to be good doorstep collection schemes in place for recyclable and compostable materials and good alternatives, such as reusable nappies for avoiding non-recyclable waste.

Friends of the Earth believes that systems must be designed to avoid a disproportionate impact on low-income families. However, this issue could be addressed through a rebate system similar to the one in operation for the council tax. Initially, there may be an increase in fly-tipping, but research shows this has not been a major problem in other countries. Putting in place high fines for fly-tipping helps to avoid the risk.

Giving councils the power to directly charge for waste management has received support from both the public and private sectors. Many councils are keen on variable charging and around 40 per cent would set up schemes if they had the power to do so.^x Several have introduced very successful financial incentives and penalties to encourage recycling and reduce waste. For example, household waste recycling in Barnet rose from nearly 17 per cent to 29 per cent in the two years since it introduced compulsory recycling backed by fines.

Variable charging schemes need to be developed with the support of the public so we are calling on the Government to give local authorities the power, but not a requirement, to develop schemes appropriate to their local situation.

Waste prevention targets

Question 10: Should there be greater effort to encourage waste prevention and minimisation relative to recycling and, if so, how should this be done?

The Government predicts that the amount of MSW we produce will rise by between 0.75 per cent and 2.25 per cent year on year. This means we could be producing as much as 41.6 million tonnes of MSW in 2020. The Government also says that commercial waste will increase by about 50 per cent by 2020.

However, the Government's waste strategy contains no clear policies for dealing with these increases and there is no target for waste prevention. We should be moving away from the 'predict and provide' model and instead be deciding where we want to be and what policies we need to adopt to get us there. A 50 per cent increase in commercial waste is surely not desirable so this growth needs to be addressed rather than just accepted. Even the Government's own research has shown that a waste strategy based on waste prevention would have greater environmental benefits than the proposals in the current review.^{xi}

The Government needs to set an ambitious waste prevention target and adopt policies to ensure that it is met. There is considerable scope to reduce waste production through reuse and avoidance measures. One measure that the Government could adopt to increase household waste prevention would be variable charging (see comments above).

Friends of the Earth would like the Government to adopt the following waste prevention policies:

- Adopt a target to achieve zero growth of all waste by 2010 and by 2008 the Government should identify a waste prevention target for all waste for 2020.
- Adopt a target to reduce MSW by 1.5 per cent per year

The target of zero growth for total waste by 2010 is achievable and will give the Government time to collate research and data on a target for 2020.

The average annual increase in MSW from 2000/01 to 2004/05 has been 1.5 per cent, and there was a decrease of 1 per cent in MSW arisings between the years 2002/3 and 2003/04. Therefore a target of 1.5 per cent reduction year on year for MSW is realistic given that even without policies aimed at reducing growth we have had years when MSW arisings decrease.

Incineration

Question 26: Do you have any comments on the proposal to encourage the diversion of wastes from landfill to Energy from Waste?

A big increase in energy from waste plants - or incinerators - form a key part of the Government's waste strategy. However, it does not make sense to encourage the diversion of waste from landfill to energy from waste - a move of only one step up the hierarchy. Much more needs to be done to encourage diversion of waste at the top of the hierarchy. And unfortunately the consultation document is thin on the ground when it comes to policies that will deal with the prevention and re-use of waste that are higher up the hierarchy than energy from waste.

The Government also seems to take a narrow view of what technologies come under the term "energy from waste". However, it is clear from reading the consultation document that the two technologies they consider to play a big part under the term "energy from waste" is MBT with RDF production and waste incineration with energy generation.

Waste incineration should be the least favoured method of dealing with residual waste after landfill. Waste incineration is a waste of natural resources, undermines recycling and composting by tying local authorities in to 20-30 year contracts, contributes to climate change and causes pollution from air emissions and toxic ash.

It is often quoted that incinerators are beneficial in terms of climate change as they burn biodegradable waste thus displacing the need for fossil fuels. However residual waste also contains plastics which are fossil fuel based and so emit greenhouse gases when incinerated, therefore contributing to climate change. As recycling levels increase the amount of plastic in the residual waste stream will also increase thus decreasing the appeal of waste incineration in terms of climate change. In fact research carried out for the Community Recycling Network showed that in terms of climate change there is little long term difference between waste incineration and landfill for treating residual waste.^{xii}

Removing economic incentives for incineration

It is vital that an increase in landfill tax and the Landfill Allowance Trading Scheme do not encourage local authorities to simply divert waste from landfill to another form of disposal. Unfortunately there are no policies proposed in the consultation to ensure that we don't just move from landfill to incineration for MSW in England. Therefore Friends of the Earth want the Government to discourage the use of incinerators to dispose of waste, for example through bringing in a tax on incineration.

A report carried out for the Government by HM Customs and Excise^{xiii} showed that the net external costs of waste incineration with energy recovery are slightly higher than for landfill with gas flaring. Therefore as there is a tax on landfill a tax on incineration should also be introduced.

The Government will also need to assess the existing tax breaks and support measures for waste management options, and to examine the case for removing the subsidies received by thermal technologies. Current subsidies for thermal waste technologies (such as incineration, gasification and pyrolysis) are delaying a more sustainable system being developed. These subsidies pull in the opposite direction to waste policy, and they make little sense in terms of averting climate change.

Question 27: 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?

The Government has a very narrow view of the potential means to generate energy from waste. It is surprising that Anaerobic Digestion (AD) is not mentioned anywhere in the consultation document. AD produces both energy from waste and a soil improver if it is used to treat source-separated biodegradable waste.

The Government should introduce more supportive policies on promoting AD over either of the two energy from waste technologies mentioned. A more appropriate question would be “is there a preferred treatment method for residual waste in environmental terms?”

Responding to the consultation on the Waste Strategy Review

You can submit a response to DEFRA's consultation online at:

<http://www.defra.gov.uk/environment/waste/strategy/review/>

Alternatively, please contact Dialogue by Design on 020 8683 6602 or facilitators@dialoguebydesign.com.

Please contact Becky Slater on beckys@foe.co.uk if have any questions.

If you have already taken part in Friends of the Earth's press for change email action on the Waste Strategy consultation, or sent in a standard response letter, please mention make sure that it is clear in your response that you are now submitting an additional response.

- i <http://www.defra.gov.uk/environment/waste/localauth/pdf/lacompostrecycle-rates0405.pdf>
- ii Green Alliance (2006). *An international survey of Zero Waste initiatives* (in press)
- iii ERM (2006). *Impact of energy from waste and recycling policy on UK greenhouse gas emissions*. <http://www.defra.gov.uk/environment/waste/strategy/pdf/ermreport.pdf>
- iv Strategy Unit (2002). *Waste not, want not – a strategy for tackling the waste problem in England*. <http://www.strategy.gov.uk/downloads/su/waste/report/downloads/wastenot.pdf>
- v Cambridge Econometrics, AEA Technology (2003). *The benefits of greener business*.
- vi Friends of the Earth (1995). *A superficial attraction – the voluntary approach and sustainable development*. www.foe.co.uk/resource/reports/superficial_attraction.html
- vii Resource Recovery Forum (2003). *High diversion: Is it achievable?*
- viii CIWM (2003). *Waste collection: to charge or not to charge?* <http://www.ciwm.co.uk/pma/30>
- ix Strategy Unit (2002). *Waste not, want not – a strategy for tackling the waste problem in England*. <http://www.strategy.gov.uk/downloads/su/waste/report/downloads/wastenot.pdf>
- x Materials Recycling Week (April 2005). *State of the nation report 2005*.
- xi DEFRA (2006). *Review of England's waste strategy - Environmental report under the "SEA" Directive*. <http://www.defra.gov.uk/corporate/consult/wastestratereview/environreport-rev.pdf>
- xii Community Recycling Network (2002). *Maximising recycling rates: tackling residuals*. <http://www.crn.org.uk/gifs/tackling%20residuals%20web%20version.pdf>
- xiii HM Customs & Excise (2004). *Combining the Government's two health and environment studies to calculate estimates for the external costs of landfill and incineration*.