

Response: Waste Prevention Programme for England: Towards a Resource-Efficient Economy

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About the District Councils' Network

The District Councils' Network (DCN) is a cross-party member led network of 183 councils. We are a Special Interest Group of the Local Government Association (LGA), and provide a single voice for district services within the Local Government Association.

Our member councils in England deliver 86 out of 137 essential local government services to over 22 million people - 40% of the population - and cover 68% of the country by area.

District councils have a proven track record of building better lives and stronger economies in the areas that they serve. Districts protect and enhance quality of life by safeguarding our environment, promoting public health and leisure, whilst creating attractive places to live, raise families and build a stronger economy. By tackling homelessness and promoting wellbeing, district councils ensure no one gets left behind by addressing the complex needs of today whilst attempting to prevent the social problems of tomorrow.

Response from the District Councils' Network

Key Messages

The District Councils' Network are very pleased to be able to consult on these proposals and would express that our overriding view of this programme is positive and supportive. We agree that to ensure a truly sustainable waste system efforts need to be focused on minimising waste at source in an approach that pushes items up the waste hierarchy and creates a more circular economy. In the long run this will have far greater benefits and impact than wider design changes to waste services.

Districts are constantly engaged with our communities and will be leaders in communicating the changes to our lives and behaviour that will be needed to meet net zero ambitions. We would therefore always stress the importance of engagement of consumers, and how waste reforms in general will be contingent on effective engagement and a significant alteration of how consumers view materials. This will be no easy change and will require regular well-thought-out strategies to bring about a radical transformation in consumer behaviour. This should then be at the forefront of any such programme.

The DCN wholeheartedly welcomes the furtherance of Extended Producer Responsibility schemes and believes in the 'polluter pays' principle. These schemes should be robust and modulated carefully to ensure their potency in changing the practices of producers. This will

represent a huge step towards minimising waste at source and be crucial to creating a sustainable waste system.

We would highlight that many of these proposals will have impacts on those which were included within the further service design consultations, recently opened as part of the Resources and Waste Strategy. For example, successful minimisation of food waste will have effects on the separate weekly food waste collection service proposed. We would hope that the aims included here are achieved as we believe it is the right strategy going forward, but this would mean the collection service would become increasingly uneconomical and ultimately redundant. This should be included in the further consideration and assessment of this collection service.

District councils are already leading the way in the utilisation of sustainable technologies and systems with the aim of creating net zero communities. They can be key partners in ensuring this programme is a success. We would therefore urge that stakeholders across government work with us to deliver low carbon, low waste localities, and give districts the autonomy to create local practices that best achieve this for their communities.

Individual answers to consultation questions

Chapter 1: Introduction

Refer to pages 1-13 in the draft Waste Prevention Programme

Question 8: Do you agree or disagree with our choice of impacts and outcomes as the right goals for us to be aiming to achieve?

Disagree

If you disagree, please briefly explain why.

The impacts and outcomes that are listed are appropriate goals but it should always be remembered that one of the ultimate overarching outcomes of such a programme must be a marked change in how all people view objects and materials. To minimise waste in the way needed a sea change from a 'throwaway' culture, and a fundamental alteration of how consumers value materials is needed. Changing consumers' mindsets will always be challenging and though the strategic principles included within the programme will aid with this, further work to engage and educate consumers should also be a focus. The previous momentum and action on plastic waste as a result of such engagement is a demonstration of that importance. TV programmes and press have caused a public outcry and this momentum must be maintained by regular continued engagement about the issues surrounding waste.

This means that an impact such as: "Greater awareness and engagement on waste pollution and resource value", and an outcome of: "materials properly valued by consumers throughout their lifecycle" should be included.

In general though, we would stress that the District Councils' Network (DCN) is very encouraged to see waste minimisation considered and the foundations being laid for a more circular economy, which we hold as crucial to a successful Resources and Waste Strategy.

Question 9: Do you agree or disagree that our policy approach covers all the areas for action that are needed?

Agree

If you disagree, please explain what you think is missing.

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Refer to pages 14-18 in the draft Waste Prevention Programme

Question 10: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

b. Agree

Please provide details / explain your answer

We agree with the general measures described and believe that they should go towards achieving the overall aim of this programme.

We certainly support robust and incentivised Extended Producer Responsibility schemes in line with the 'polluter pays' principle. This will have a great impact on efforts to minimise and prevent waste at source and therefore will be one of the most crucial mechanisms of the Resources and Waste Strategy. Modulated fees within these schemes will be key in encouraging changing practices of producers. We would also suggest consideration of the introduction of contracts for difference for recycled content to further incentivise change, with funding potentially coming from plastic tax revenues or unclaimed DRS deposits.

We also agree that providing consumers information will be vital to success of the programme. Efforts should be taken to ensure that the retail conditions created make it as easy and appealing as possible for consumers to make more sustainable product choices. The supply of information is important but standardisation of options across products, if possible, will help make these choices easier; we are therefore pleased to see that a systemic approach will be taken. Again, we would stress that these efforts will need to be coupled with effective public engagement campaigns on the need and benefits of making sustainable choices. District councils can play a large role in delivering such campaigns, given their experience of talking to communities about these issues.

Chapter 3: Reuse, Repair, Refill, Remanufacture: local services and facilities

Refer to pages 19-22 in the draft Waste Prevention Programme

Question 11: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

Please provide details / explain your answer

We agree that these actions should aid in the creation of a network encouraging reuse and repair. The DCN supports proposals around the creation of circular economy hubs and our members are highly ambitious in their aims in fostering the creation of sustainable communities that help us reach net zero targets.

We would note that districts are leading the way in piloting and rolling out a variety of sustainable technological and community-facilitated net zero solutions. We also note the reference in this chapter to accounting for waste prevention within Local Plans. This raises a wider issue of the disconnect between the planning framework and the aforementioned net zero ambitions of many districts. Our members are finding that the soundness of their Local Plans is being questioned when they build in net zero targets, given that viability assessment criteria are not based on this agenda, and instead focus on protecting land values. We would suggest then that the planning framework in its entirety should be reconsidered to incorporate and encourage net zero targets such as waste minimisation.

Chapter 4: Data and Information: from industrial symbiosis to research & innovation

Refer to pages 23-27 in the draft Waste Prevention Programme

Question 12: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Not answered

Please provide details / explain your answer

The DCN has no further detail or opinion on this section of the programme at this time.

Chapter 5: Construction

Refer to pages 28-31 in the draft Waste Prevention Programme

Question 13: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

Please provide details / explain your answer

We believe that these measures are appropriate and are pleased to see an emphasis included on how embodied carbon can be reduced in construction. We were disappointed to not see this properly addressed in the Future Homes and Future Buildings Standards and therefore welcome further detail on the work that MHCLG will be doing with Defra on this matter.

Chapter 6: Textiles

Refer to pages 32-36 in the draft Waste Prevention Programme

Question 14: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Not answered

Please provide details / explain your answer

The DCN has no further detail or opinion on this section of the programme at this time.

Chapter 7: Furniture

Refer to pages 37-40 in the draft Waste Prevention Programme

Question 15: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

Please provide details / explain your answer

We are broadly in favour of these measures and see them as appropriate in introducing a sharing economy to this country. Our districts look forward to working with the businesses, charities, and social enterprises in their communities to facilitate the creation of the sustainable models described, and further our work in creating net zero communities. We would again stress that a joined-up approach across government departments is needed to facilitate this and provide the conditions for such projects to be viable and to thrive.

Chapter 8: Electrical and Electronic Products

Refer to pages 41-45 in the draft Waste Prevention Programme

Question 16: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Not answered

Please provide details / explain your answer

The DCN has no further detail or opinion on this section of the programme at this time.

Chapter 9: Road Vehicles

Refer to pages 46-51 in the draft Waste Prevention Programme

Question 17: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Not answered

Please provide details / explain your answer

The DCN has no further detail or opinion on this section of the programme at this time.

Chapter 10: Packaging, Plastics and Single-use Items

Refer to pages 52-55 in the draft Waste Prevention Programme

Question 18: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Neither agree nor disagree

Please provide details / explain your answer

The DCN are very hopeful that the measures will achieve the overall aims and certainly support the introduction of an EPR scheme that provides financial support to authorities dealing with excessive waste. However, we must await the final details of the EPR scheme to confirm its efficacy. The current consultation document gives scant detail on how the scheme will be designed to encourage prevention and reuse. We would also emphasise that effective modulated fees within the scheme will be necessary for it to be a key driver of change with producers.

Chapter 11: Food

Refer to pages 56-60 in the draft Waste Prevention Programme

Question 19: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

Agree

Please provide details / explain your answer

These are sensible suggestions and would be effective in achieving the aim laid out. The DCN believe that the minimisation of food waste should be the focus of efforts, as opposed to increased collections of food waste.

A truly sustainable system would see the wasting of food reduced at source; with any excess remaining redistributed or if possible, composted at homes to create an efficient system.

It should be noted that if efforts to engage citizens on reducing food waste are successful, then separate food waste collection services will become increasingly redundant and uneconomical. This should be remembered in relation to proposals included in the 'Consistency of Household and Business Recycling in England' consultation currently open.

Chapter 12: Monitoring and Evaluation

Refer to pages 61-66 in the draft Waste Prevention Programme

Question 20: Do you agree or disagree with the described approach to monitoring and evaluation of this Waste Prevention Programme?

Agree