

The Defra Waste Review 2011: Reflections from the Industry

**Report of an industry survey to assess
reactions to the Government Review of
Waste Policy in England 2011**

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Executive Summary

Beasley Associates and RGR devised a short survey to capture reflections and opinions on the Defra Waste Review 2011 at a point where industry leaders would have had a chance to read the Review in more detail and reflect on its contents.

This survey was produced electronically and sent to 172 leading figures from all parts of the waste and resources sector. Over 30% responded to the survey, coming from a wide cross-section of the industry, including CEOs and leaders of major waste and recycling companies, trade bodies, equipment providers, senior figures from local government, the third sector, NGOs and professional service providers.

Over **two-thirds of respondents had read the Review in full** and so this summary reflects the considered views of stakeholders that have read more than just the media and industry summaries and analysis.

The **general level of disappointment** expressed by many in the industry in the immediate aftermath of the Review **continues to be reflected in our findings**. Over **80%** of respondents have found the Review **not at all or not very ambitious**, with no respondents at all indicating that they found the Review ambitious. Over half of respondents expressed a lack of confidence that the Review provides sufficient foundation for the successful development of the 2012 Waste Management Plan.

We asked participants to list three key issues they felt had been addressed both well and poorly by the Review, without any prompting with suggestions.

When asked about issues that had been addressed well, almost 30% chose not to state any at all. Of those that could think of issues that were addressed well, two issues dominated. There was a welcome for the **abolition of the LATS scheme** (noting that this had been heavily trailed and was no surprise), followed by approval for the move towards better **integration of commercial waste with municipal** and supporting SMEs to facilitate more recycling.

When asked about issues that had been addressed poorly, all respondents provided views. By far the most frequent comment was about the **absence of targets across the board** - not just targets for recycling household waste, but targets for prevention, packaging (extending Producer Responsibility), and also C&I. Repeatedly it was seen as a significant weakness in the Review. The second dominant issue was concern about **over-reliance on voluntary agreements** and using responsibility deals as an alternative to regulation.

Finally, when asked if the Review would have an **impact on the way they did their job**, over **70% said yes**, although most of those respondents said this would be in a negative way not positive.

In conclusion, the snapshot of considered views captured in this survey, spread across all parts of the industry, would appear to suggest that the opportunity to reflect and analyse the Review in more detail has not lead to any obvious increase in support for the Review or optimism about its likely outcomes.

Introduction and rationale for the survey

Defra launched the *Government Review of Waste Policy in England 2011* (the Waste Review) during the Chartered Institution of Wastes Management's major conference in London in June 2011. At the time and in the immediate aftermath, much of the commentary and reaction to the Waste Review reflected a general sense of disappointment with the Waste Review in many parts of the waste and resources industry.

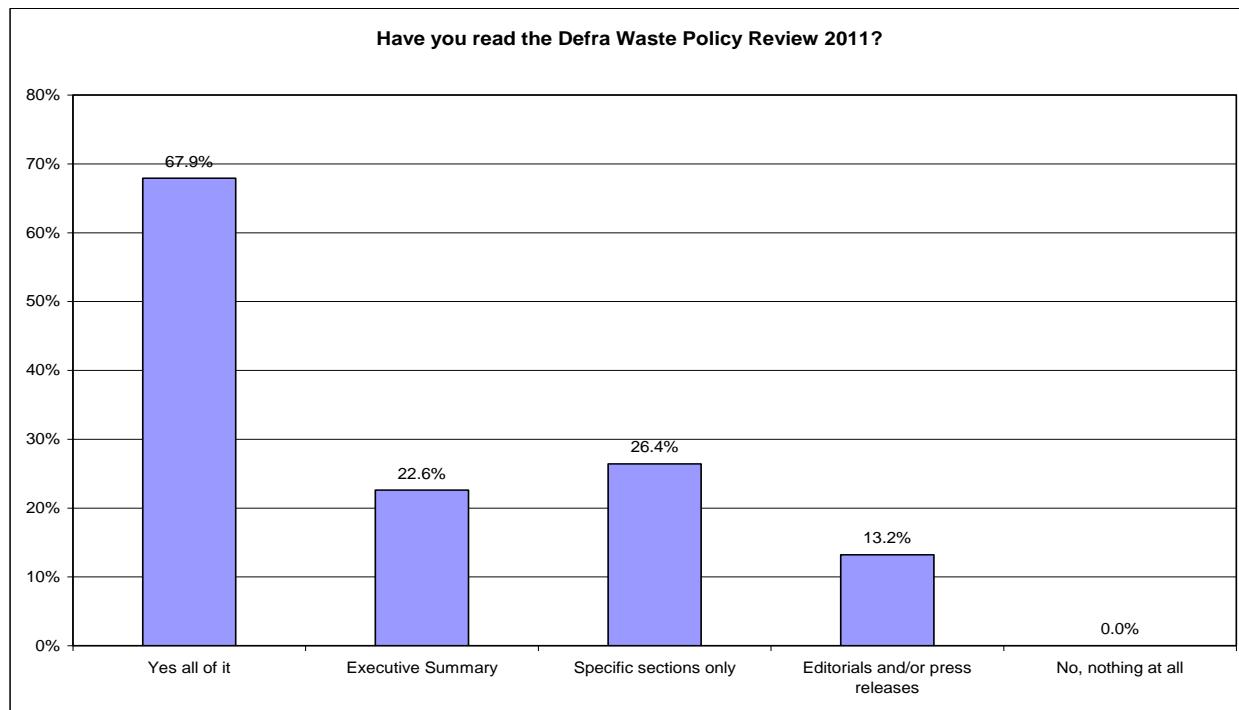
Beasley Associates and RGR decided to produce a short survey to test industry opinion in more detail about the Waste Review. We decided to do this a few weeks after the launch, to reasonably give stakeholders an opportunity to have read and analysed more of the content of the Review, rather than rely on the immediate commentary and reactions of the industry in the first few days after the event.

We produced a short questionnaire and administered this through Survey Monkey. It was distributed to leading industry figures from all parts of the spectrum. Our basis for this was Resource magazine's 'Hot 100' leading figures for 2011, which we supplemented from our own database of leading industry contacts to ensure that all parts of the sector were fairly represented. We excluded Defra civil servants as it seemed unreasonable to ask them to react to their own Review, and all Scottish, Welsh and Northern Irish listings – focusing on those for whom the Review had a direct relevance in England. A total of 172 industry figures were contacted during August 2011, from which a 30% response rate was received, ranging across the industry spectrum and providing a good cross-section profile of the industry including private, public and third sector representation as well as Government agency and quango representation.

Responses to quantitative questions

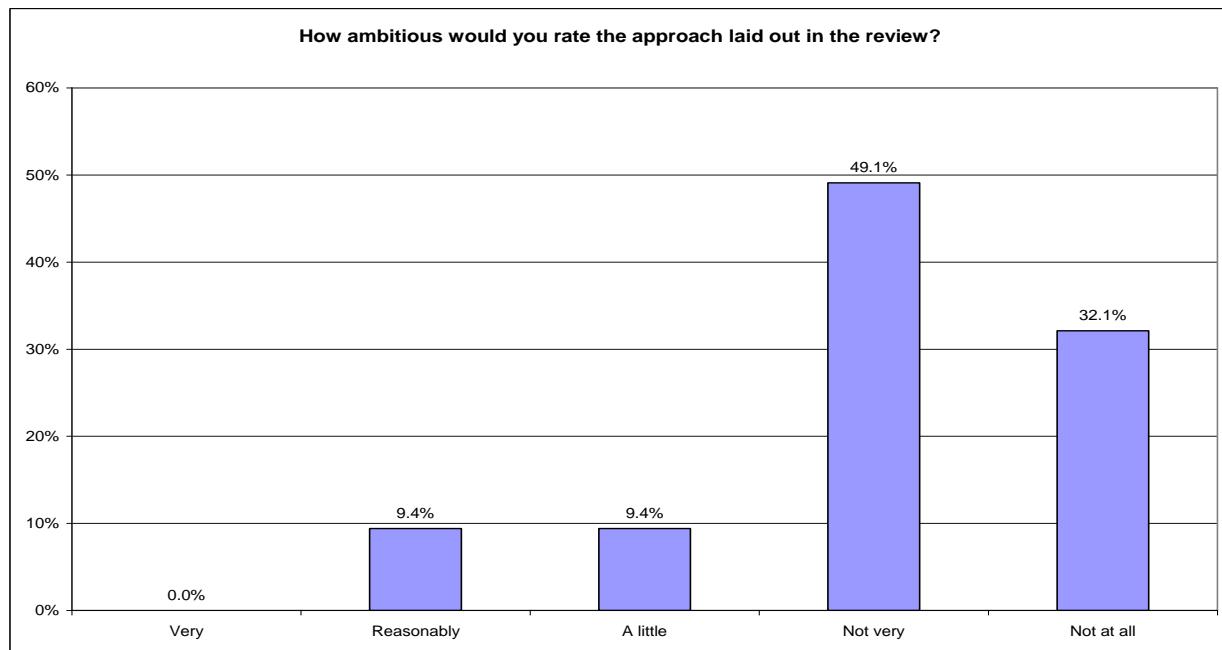
When asked whether they had read the Waste Review, 68% of respondents had read all of it (Figure 1), which is encouraging. Those who hadn't read the full document generally considered time to be the biggest barrier - some felt that the limited exposure they had already seen, such as press coverage, editorials and the executive summary led them to consider that the content didn't justify spending the time to read the entire document! Others didn't feel it was necessary for their job to read anything other than specific sections.

Figure 1: Percentage of Respondents that have read the Defra Waste Policy Review 2011



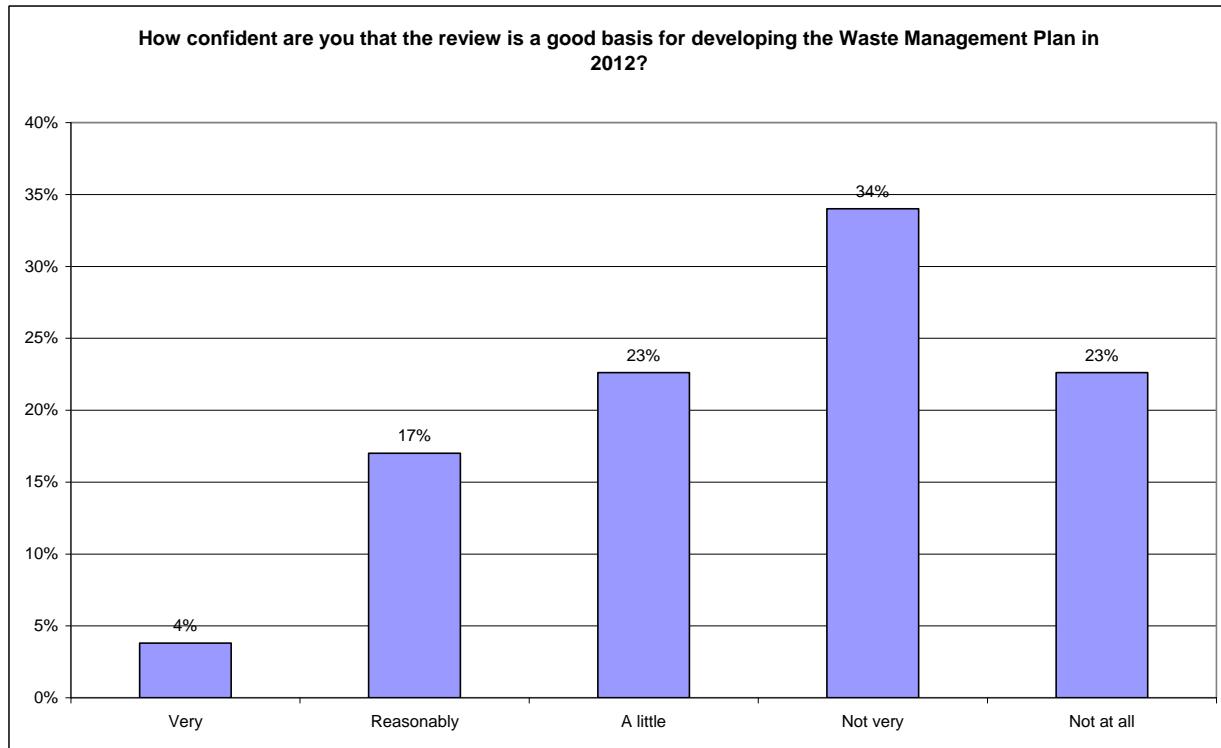
When asked about the level of ambition in the Waste Review, just under half of all respondents felt that the approach laid out in the Review was not very ambitious with 32% considering it to be not at all ambitious. In total 82% of respondents were negative in response to the question of the Review's ambition (Figure 2).

Figure 2: Respondents opinion on the level of ambition of the Review



When asked about how confident they felt that the Review was a good basis for developing the Waste Management Plan in 2012 57% were not very or not at all confident (Figure 3). Only 4% felt very confident.

Figure 3: Confidence in the Review as a basis for development of the Waste Management Plan 2012



Responses to qualitative questions

Issues addressed well

We asked participants to list three key issues they felt had been addressed well and poorly by the Review, without any prompting with suggestions.

It should be noted that when asked about issues that had been addressed well, **28% of respondents chose not to state any at all**. Of those that could think of issues that were addressed well, two issues dominated. There was a welcome for the **abolition of the LATS scheme** (noting that this had been heavily trailed and was no surprise), followed by approval for the **integration of commercial waste with municipal** and supporting SMEs to facilitate more recycling.

Beyond these two key issues, a series of issues were mentioned by respondents in a positive light:

- The importance of tackling C&I waste, recognising the need for a more integrated approach.
- A clear focus on the options at the top of the waste hierarchy, specifically an increased emphasis on waste prevention issues.

- The role of anaerobic digestion and particularly the accompanying strategy and plan.
- Lighter regulation approaches and a review of regulation and enforcement at local level.
- The use of a carbon metric, recognising that a weight based approach is not the only or the best way to report on waste management progress and the inclusion of a carbon metric.
- Review of landfill bans (although there was the view that as wood and textiles have increasing value and are less likely to end up at landfill it would have been better to start with other materials such as biodegradable waste to support the AD position).
- Product lifetimes and the need to address this area, including recognition of the link between consumption and waste arisings.
- Collection systems and frequency of collection being left to local and market decisions.
- Commitment to food waste as a priority waste stream.
- Voluntary responsibility deals.

Despite identification of issues considered to have been addressed well in the Review, there was an underlying scepticism by many who responded that it was all words – the action needed to deliver on these good intentions wasn’t necessarily there and that it remained positive rhetoric with little chance of delivery. Concern was expressed by many that the mechanisms to support action and a true ‘joined up’ approach was missing.

Issues addressed poorly

When asked about issues that had been addressed poorly, all respondents took the opportunity to provide views. By far the most frequent comment was about the **absence of targets across the board** - not just targets for recycling household waste, but targets for prevention, packaging (extending Producer Responsibility), and also C&I. Repeatedly it was seen as a significant weakness in the Review which would be “detrimental to maintaining momentum and building on the good work achieved so far by LAs”. The second dominant issue was concern about **over-reliance on voluntary agreements** and using responsibility deals as an alternative to regulation.

Beyond these two key issues, a series of other issues were mentioned by respondents, listed in order of level of interest. They included:

- Lack of recognition of previous research, specifically repeating the consultation work on landfill bans and on identifying barriers to reuse which is considered as a waste of time and money by some as it has all been done before. This viewed as a delaying tactic to avoid making actual policy decisions and all contributes to ongoing uncertainty which affects decisions at local level as well as private sector financing.
- The decision to revoke the ability to use financial incentives to charge at household level was seen as a poor but predictable decision and was considered by some as contradictory to the ‘localism’ agenda.
- Greater enforcement of Trans Frontier Shipment rules was called for particularly to address the issue of illegal exports. Export of waste was raised by a number of respondents and the fact it had not been adequately addressed in terms of specific actions.
- Material quality issues had not been resolved or adequately targeted in the Review.

- A clear position on household waste collection was called for. It was felt by some that an over focus on frequency of collections has diverted attention from the more important issues. In addition, the Review did not generate a formal end to speculation about the return of weekly residual waste collections.
- A clear approach on food waste, the AD capacity required and how feedstock for AD will be generated has not been provided – scepticism that appropriate landfill bans will not come into play and without targets there is no regulatory drive forcing councils to act. The ability of treatment plants to raise funds will be severely compromised as a result, particularly in light of current economic climate – uncertainty will jeopardize the ability of plants to secure investment. Concern that there is a heavy bias towards AD without the back up of a landfill ban for organics or formal requirement for separate collections.
- There were lots of complaints that no assistance was being provided to allow infrastructure development to speed up – where is the planning link between new infrastructure developments needed and the green growth agenda? The lack of any substance on planning policy was raised a number of times.
- Community recycling and importance of the community sector in delivering was not fully addressed.
- Failure to impose source separation requirements on businesses was seen as a big barrier. In addition a number criticised the Review for an “apparent lack of understanding of the reasons for the slow development of C&I capacity.”
- There was nothing on structural reform in the public sector to make waste management more efficient – no precept powers for joint waste authorities.

In summary, a thread running through much of the critical comment about the Review is a fundamental concern expressed about the lack of ability in the Review to turn higher level concepts into actual deliverables for change. This is reflected in the concerns expressed about how few drivers there are to accelerate change, especially on waste prevention. Many respondents indicated their concern about a ‘wish list’ approach that appeared to take waste policy back to the 1990s in terms of language used versus actual policy targets. The Landfill Tax is noted as the main legal and financial driver, and many expressed concern that this is a limited approach. This sits alongside concerns about a lack of ambition and vision of the waste and resources industry’s role in supply chain resource management in the future and the economic opportunities this may offer.

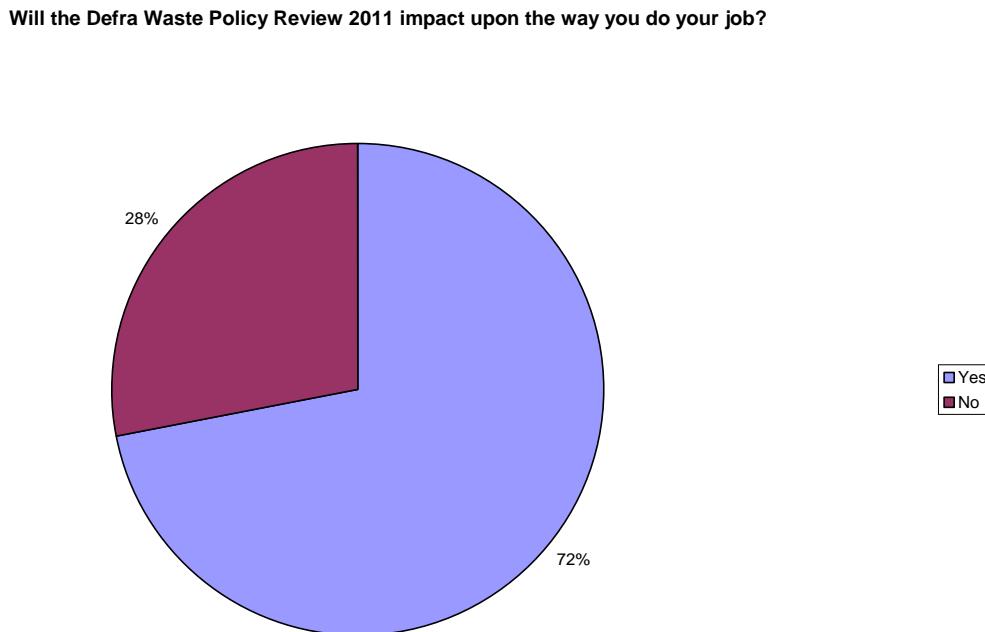
It is fair to say that the balance of commentary between the positive and the negative is firmly weighted towards the negative, but we have sought in this summary to make sure that positive comments where they were made have been fully reflected.

Impact

When asked whether the Waste Review would impact upon the way the respondent did their job 72% said it would (Figure 4). However, the way it would impact was generally seen as quite negative in terms of the need for greater campaign work and lobbying of the Government over the next 12

months to ensure that the Waste Management Plan 2012 is more ambitious and addresses some of the limitations identified in the Waste Review.

Figure 4: Respondents view on the impact of the Review



Further comments on the Review

Negative commentary

The opinion that the Review was “a wasted opportunity” was repeatedly expressed by a significant number of respondents. In addition there comments that the Review “contained a lot of good ideas but these could not be followed through into workable policies” and that whilst it covers issues that have been raised over the years by various sectors operating within the industry it does not go far enough in addressing these issues adequately.

Many felt that the Review fails to give the leadership that those with an interest in waste were anticipating and instead focussed on the smaller, populist issues.

There was the opinion that this was “a review proposed in haste and produced with very little ambition in terms of long term objectives”. It was felt that crucially, “this lack of ambition, certainly when compared to the devolved administrations, will probably be evidenced by the improvement in England’s recycling rate slowing compared to its neighbours”. In addition, far from bringing an end to uncertainty and “providing comfort to the sector which has been in limbo for 12 months”, we are facing “another hiatus” whilst we wait for the Waste Management Plan 2012 to be developed.

There was a strong feeling that it could have been a lot more ambitious particularly with a real focus on prevention, reuse and ban on the landfilling of food waste. It was felt that the latter would significantly stimulate the AD sector which was considered by some to be “really limping along at the moment”. This approach was also viewed positively in that it would “significantly reduce our CO₂ impacts and in turn create economic gain through employment generation”.

In terms of the lack of goals and targets and formal policy tools, the use of voluntary agreements was heavily criticised with the view that “leaving the achievement of key efficiency improvements through 'voluntary' agreements is dangerous - some sectors will respond while others will not.” Over reliance on this approach was not widely supported.

In terms of technologies some felt that EfW was given greater credence than it should and that in the review “Government has effectively given the green light for EfW to dominate the landscape for the next 10-20 years”, and that this was “hardly the behaviour of 'the greenest government ever' ”.

It was considered by a number of respondents that the Waste Review, whilst highlighting many of the issues “does not seem to be very decisive”. Further to this “with resource scarcity becoming an increasing issue, the economic case for recovery of materials is strong. However this will require a mix of ambitious targets and decisive action a good mixture of stick and carrot to achieve.”

There was a call for real joined-up government in the sphere of sustainability/green agenda and better cross-departmental thinking to deliver real improvements and to avoid lost opportunities. Conflicting priorities between Government departments were considered to dominate the review and many felt that decisions makers were “bogged down in politics rather than focusing on the issues and how to tackle them”. An example of this was far too much focus on the disagreement about the approach towards collections, which after all is a small part of the overall resource efficiency agenda. There was the opinion that “Government needs to develop a supply chain approach to the £4billion a year that the public sector spend on waste management each year and turn it to economic advantage rather than view it in the traditional public sector public health view of the world.”

Positive commentary

Positive final comments were few and far between however there was the view held by one respondent that “It's a reasonable holding position in most areas.”

Another respondent described it as “a thoughtful document that introduced some big ideas into UK policy-making (although one had to read between the lines to glean this) including: Extended Producer Responsibility, the possibility of introducing minimum recyclable content in products, and a raft of potential voluntary agreements covering not just EPR but also a wider range of environmental issues relating to waste and product use.”

Another respondent was more pragmatic and considered that the review would lead to an increased role for organisations to help Government meet some of the targets in the action plan thereby increasing stakeholder involvement and potentially satisfying Big Society goals.

Finally whilst one respondent described it as “A high risk strategy, making the assumption that existing legislation can be made to work more effectively through voluntary deals and a bit of tweaking”, they did make the case that it may just be that the cost incentives driven by landfill tax will end up achieving the desired result. In which case, “avoiding additional regulation - and the need to enforce it as in Scotland - could be a good thing.”

Conclusion

In conclusion, the snapshot of considered views captured in this survey, spread across all parts of the industry, would appear to suggest that the opportunity to reflect and analyse the Defra Waste Review in more detail has not lead to any obvious increase in support for the Review or optimism about its likely outcomes. Industry appears to be largely united in its negative perception of the Review with disappointment expressed across all sectors.

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