Committee:	Date:	
Port Health and Environmental Services	09 September 2013	
Subject:		Public
Summary of the Waste Strategy Public Consultation and proposals to finalise and publish the revised Waste Strategy 2013-2020		
Report of:		For decision
Director of the Built Environment		

Summary

This report is to inform Members that following a number of significant changes in policy at national and local levels the City of London chose to review and re-publish its current Waste Strategy (2008 – 2020).

This Committee approved the review and was invited to offer comments on the Strategy via a Members' workshop and also the public consultation process. The feedback obtained from the consultation process was positive. Following this feedback the Strategy document was amended to include the impact which the Strategy would have on Air Quality and also includes the commitment to baseline emissions from our waste management solutions using The Mayor of London's Greenhouse Gas Calculator.

The public consultation process is now complete, and the Strategy is ready to be published. This report contains a list of the consultation activities which were carried out along with a summary of the responses received.

Recommendations

It is recommended that this committee:

- 1. Endorse the amendments to the draft strategy
- 2. Approve the revised waste strategy for adoption and publication

Main Report

Background

Why does the City need a Waste Strategy?

1. All Waste Disposal Authorities in England, under the Waste and Emissions Trading (WET) Act 2003, have a duty to have in place a strategy for the management of their municipal waste. Local authorities should either produce or contribute to a Strategy or equivalent. The long term strategic planning is vital to all authorities in securing both the infrastructure and service developments necessary to deliver more sustainable waste management and it therefore makes good business sense to have a clear strategy on how we intend to treat waste.

The current Waste Strategy

2. The current Waste Strategy was written in 2007 and published in January 2008; it covers the period 2008 – 2020. When produced there was a commitment to review it periodically to ensure that the City always had a relevant waste strategy document. In November 2011, Cleansing Services started working in partnership with LRS consultancy in a process to identify if there had been any significant changes in

government waste and recycling policy, legislation or local strategies which may have had an impact on the City's waste strategy.

3. This work highlighted that since the writing of 2008 document there have been significant changes in policy at national and local levels. Also the City's contractual arrangements have changed.

Why is there a need to have a revised Waste Strategy for the City of London?

- 4. The following significant changes in policy have been identified:
 - a) A government review of Waste Policy in 2011.

The Government's review of National Waste Policy in 2011 placed a much clearer focus on 'Waste Prevention' and the need to ensure all material resources are fully valued both financially and environmentally. Whilst previous national strategies have placed a heavy focus on recycling rates the 2011 policy review removed the national Indicators 191, 192 and 193 and instead urged councils to focus on local issues and indicated a move towards the use of a carbon 'metric' (measurement). This is a methodology or model of standard measurement (weighting) applied to each material stream in recycling to measure the CO2 equivalent. It takes into account the whole life-cycle, giving the CO2 equivalent for each material returned to a virgin material state. For example, for aluminium it would include the mining, smelting, transport, manufacturing, and so on.

The government review of Waste Policy 2011 also outlined the intention to develop materials recycling facility (MRF) codes of practice. This will be "key to maintaining the credibility of co-mingled collections under the revised Waste Framework Directive". The review also placed strong emphasis on incentives for recycling as well as on the quality and frequency of services provided to residents, as opposed to merely providing a basic service.

b) <u>The implementation of The Mayor of London's Municipal and Business Waste</u> Strategies also in 2011.

The Mayor of London's Municipal Strategy was similar in focus to the National Policy Review, again moving away from the need merely to provide a basic collection service and how to go further in service provision especially for flatted properties which make up a significant proportion of London's housing stock. This included objectives around the establishment of a London wide network for the collection of bulky waste as well as a more general focus on repair and reuse.

The Mayor also placed an emphasis on the measurement of Carbon as a key indicator whilst still setting stretching goals for recycling rates, waste reduction and the amount of waste being sent directly to landfill.

Alongside the Mayor of London's Municipal Strategy he also produced a Business Waste Strategy which highlights the steps that the Mayor will take to help businesses identify and implement waste prevention measures and increase the uptake of recycled or reclaimed materials used, something which had not previously received much attention in London.

c) The start of the City's new contract for waste collection and street cleansing services (October 2011).

The start of the new contract has led to new opportunities in the development of the services provided to residents. Enterprise Managed Services have committed to supporting the City in a number of ways to improve frontline services, including the development of Recycling Roadshows and innovative methods of service delivery to maximise opportunities for recycling and reuse.

d) The transfer of the commercial waste business to Enterprise Managed Services under the new contract (October 2011).

The previous Waste Strategy included targets for increasing the commercial customer base; although we would hope that the commercial contractor has a successful business we cannot directly influence the uptake of the service from businesses. Instead our role must now focus on supporting businesses to sustainably manage their waste by offering advice and resources.

e) The Riverside Energy from Waste (EfW) facility at Belvedere becoming fully operational and is accepting all of the City's residual waste.

Now that the City have secured a long term contract for the disposal of its waste into Belvedere (until 2025) this element of the Waste Strategy is less significant; the previous Strategy focussed heavily on this element in assessing the best option for the disposal of waste.

f) The market value of recycling materials.

When the previous strategy was written comingled recycling collected by the City was sorted by a third party (MRF operators) who charged a fee per tonne for carrying out this operation (still much lower than the costs of disposal to landfill). The value of recyclable material has since increased significantly (but still is variable) and it is now standard practice for MRF operators to pay for receiving recyclables as there is money to be made from selling these items on for re-processing. The City has been in a good position to capitalise on this by having short term yearly contracts and this should be taken into account in the new strategy. It should be noted that the recycling market is subject to considerable swings dependent upon world markets, therefore the City's strategy will need to recognise this uncertainty.

Process undertaken for engagement and developing a new Waste Strategy

- 5. From April 2012 work began on developing a proposal for a new Waste Strategy document. To start this process a workshop session was undertaken with key staff of the Department's Cleansing Service and supported by the Planning Policy team to identify proposals for the direction and purpose of the new document. The plan was that the new strategy document should be an iterative, working document which could easily be transposed into departmental, team and individual objectives which gave responsibility and ownership in the achievement of the targets to be reviewed on an annual basis.
- 6. A comprehensive modelling exercise was carried out to model trends in the City's waste streams over the past three to five years to establish accurate projections and targets for consideration. A proposed initial list of key objectives was identified and eventually formed the basis of the consultation document.
- 7. A first stage draft of the Waste Strategy document was produced which was used as a basis to engage and consult Members. Members were invited to a facilitated workshop session on the 6th December 2012 which gave them the opportunity to have their views heard and for them to input into the development of the waste strategy document.
- 8. Following Members input a second draft document was produced; this was presented and approved by this committee at the November meeting.

- The revised Waste Strategy document was then put out to public consultation. The consultation process involved consulting with key stakeholders between the 27th February and the 26th May 2013.
- 10. City of London residents were consulted via the annual council tax mail outs, City businesses through a facilitated workshop and City workers through a number of roadshows held throughout the consultation period at key thoroughfares/meeting points in the City as well as in offices of City businesses. A detailed breakdown of the consultation activities carried out can be found in Appendix A.
- 11. In addition to consulting with key stakeholders within the City the revised Strategy was sent to all neighbouring Local Authorities and any relevant London wide and National Associations as well as Government Departments and Agencies including but not limited to; the Environment Agency, English Heritage, Natural England, The Greater London Authority, Association of London Cleansing Officers, DEFRA and London Councils. A full list of these can be found in Appendix B.

Feedback as part of the Consultation Process

- 12. In order to gain a degree of quantifiable feedback an online questionnaire was developed focussed on the nine objectives contained in the Waste Strategy. The questionnaire contained a mixture of 12 open and closed questions, a full breakdown of responses to these questions can be found in Appendix C.
- 13. The online questionnaire was completed by 36 stakeholders including; City of London residents, businesses and internal members of staff.
- 14. The consultation process provided a very positive response from key stakeholders and the feedback consisted of a multitude of suggestions, including ideas surrounding service provision, difficult waste streams, littering and communication. A list containing all consultation responses and the appropriate actions which will be taken by the City of London Cleansing team are outlined in Appendix D.
- 15. One main outcome of the consultation was the desire for more effective communication with residents, businesses and visitors to the City, which includes greater transparency and information provision.
- 16. Businesses were particularly keen to see better guidance on how to manage their waste and recycling, including best practice, successful case studies and increased engagement through workshops and face-to-face visits. Residents emphasised the need for information to increase understanding of what can and cannot be recycled, the value of recyclates and what happens to their recycling once it is collected.
- 17. From the online survey, it was clear that waste reduction (Objective 2), followed by recycling and composting (Objective 4) were of the highest perceived level of importance for respondents. This was followed by reusing materials (Objective 3) and zero waste to landfill (Objective 6).
- 18. As part of the consultation, respondents were given the opportunity to comment on the proposed objectives. Most responses focused on 'Objective 7: Responding to Climate Change', suggesting it required reviewing in order to address broader carbon impacts of waste management and to ensure it is aligned with the Mayor's Municipal Waste Management Strategy, and was linked to air quality. The final strategy has been amended so that Objective 7 has changed from "Responding to Climate Change" to "Responding to Poor Air Quality and Climate Change". The description of this objective and the relevant actions has also been amended with input from the Environmental Health Team. The Mayor of London's Greenhouse Gas Calculator will

be used to determine the City of London's emissions from our waste management solutions.

- 19. The Clean City Awards Scheme was a priority area for consultation and was directly addressed through a facilitated workshop with businesses operating in the City of London. This engagement resulted in the identification of some key suggestions which would require us to reassess the way in which we act as a facilitator to support businesses to 'do the right thing', through providing more information, best practice as well as a way that businesses can monitor and record what they are doing.
- 20. The final version of the Waste Strategy will contain a section summarising the consultation process and the responses received. This section is included as Appendix E.

Impact

- 21. The impact of a revised Waste Strategy will be to build on the key principles from the previous waste strategy it will provide a clear direction for how the City will sustainably manage its waste moving forward.
- 22. There is a clear focus in the Strategy to focus on waste reduction and increasing recycling rates generally from street arisings and from residential properties in particular, by reviewing service provision, providing clear information and making it as easy as possible to recycle.
- 23. The revised strategy outlines how it intends to support businesses sustainably manage their own waste by providing support, advice and examples of best practice.
- 24. In addition to this it will ensure that any waste disposed of is dealt with using the best environmentally practical option.

Next steps

25. If this Committee approves the publication of the Strategy officers will start to populate the outline Action Plan, a summary of which can be found in Appendix 5 of the Strategy document. The Action Plan will be a live document which will be updated on a yearly basis and will be from the basis of officers personal objectives, ensuring ownership and ultimately delivery of the nine key objectives outlined in the Strategy.

Financial and Risk Implications.

- 26. Intrinsic to the objectives of this waste strategy is the need to evaluate recycling and waste management contracts on a yearly basis (where possible) to ensure that best value for money is being achieved. In addition to this the Strategy will be a key document to ensuring recycling is prioritised over and above waste disposal, which in itself has financial benefits.
- 27. Costs for the disposal of residual waste are significant, (£125/ Tonne) and recently the market for recycling materials has been fairly strong, either close to nil cost or providing a modest income for every tonne that has been recycled in the City. Therefore changing people's behaviours from waste disposal to recycling will have a positive impact on our budgets for managing waste and recycling.
- 28. As an example, we currently dispose of 1493 tonnes of residual waste per year; this costs £125/tonne, costing £186,625. By moving 10% of the residual waste to recycling, the financial benefits would be a saving of disposal costs of £18,662 (149tonnes x £125/tonne) based on zero charge for recycling.

29. These figures clearly show the financial benefits of having a strategy focused on changing behaviour in this way.

Legal Implications

30. None

Property Implication

31. None

HR Implications

32. None

Strategic Implications

- 33. It is essential that the Waste Strategy strategically aligns with government and London wide policy as well as being in tune with internal policies to maintain the Golden Thread. To ensure that this happened officers liaised with other corporate internal departments during the production of the strategy. As mentioned previously the draft consultation was circulated internally and externally for consultation. Consultees included the GLA and London councils.
- 34. The review of the Waste Strategy aligns with the City of London's Strategic Objectives:

Strategic Aim 2 - To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors whilst delivering sustainable outcomes.

Strategic Aim 3 - To provide valued services to London and the nation.

Background Papers

- 1. City of London Waste Strategy 2008 2020
- 2. Government Review of Waste Policy 2011
- 3. Mayor of London Business Waste Strategy 2011
- 4. Mayor of London Municipal Waste Strategy 2011

Appendices

- A. Consultation Activities
- B. Key stakeholders
- C. Full Responses to Consultation Survey
- D. Consultation Responses Summary and City of London Response
- E. Summary of the Consultation Process

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