

The CIWM is the professional body for the resource and waste management sector. It represents around 5,500 waste and resource management professionals, predominantly in the UK and Ireland but also overseas. The CIWM sets the professional standards for individuals working in the sector and has various grades of membership determined by education, qualification and experience.

## **London Environment Strategy**

CIWM welcomes the opportunity to comment on the Mayor's London Environment Strategy and has taken views from its members especially those based in the London area, whose feedback has helped form this response.

CIWM supports the ambition of the Strategy to tackle the many environmental challenges London faces and agrees creating a healthier environment will be a key part of London's appeal as a national and global destination for businesses, tourists, students and inhabitants. Setting the Mayor's ambitions in the context of a more circular approach to the use of resources is a sensible move.

*1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?*

CIWM is concerned that "Zero Waste" appears to mean just zero recyclable and biodegradable waste to landfill. This could undermine the current wider use of the term to drive the behaviours of businesses and individuals to minimise the amount of waste arising in the first place (the top of the waste hierarchy).

The UK Government's Clean Growth Strategy is aiming for zero avoidable waste by 2050 which supports avoidance and reuse ambitions.

CIWM would be keen to understand how, given the apparent reasonable acceptance of a 42-43% household recycling rate in London, in practice the average recycling rate for London's municipal waste (accepting the European definition) will be achieved, as this will require much new activity within business generally but particularly within the private-sector waste and resources sector in London.

CIWM believes there needs to be some reconciliation or alignment of targets given there are various numbers floating around (possible future EU targets, current national targets). These policies and proposals will also be dependent on the outcome of the new Resources and Waste Strategy to be published by Defra in 2018.



CIWM believes the Mayor should lobby for:

- Regulatory rather than voluntary approaches to Extended Producer Responsibility (EPR) so that it drives commercial and industrial waste prevention, reuse, recycling/composting, energy recovery (in that order). CIWM believes this may be necessary to achieve the Mayor's 65% ambition.
- Improved enforcement powers/resources for the Environment Agency and local authorities (in relation to waste services and to planning consents for new developments that may sacrifice much needed wastes management space for the sake of other priorities such as affordable housing, sustainable transport, etc.).

CIWM asks whether there is an opportunity in London for tourism to contribute back to addressing London's waste needs? Clearly tourists do generate wastes, and the costs of these are currently met by tax-payers rather than by businesses that benefit in the first instance from tourism.

*2. Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?*

The Mayor's ambition for food waste and at least six main recyclable materials to be collected consistently fits under the WRAP Harmonisation work from which the *Food Waste Recycling Plan* and *A framework for Greater Consistency* were produced. This will help develop consistency across England.

There is already case study learning through LWARB and other networks and officer groups and this will remain important to achieve this ambition in flatted properties.

In the London Environment Strategy, there is mention of over 100 languages and with this in mind CIWM proposes the use of iconography as developed by WRAP to indicate the materials that are being targeted. Each Borough uses iconography to label their containers and so it does not matter when residents move Borough. It does not matter then if the container is a bin, box or bag, the householder/business is using the iconography to tell them what goes in the container – not the colour, shape etc.

On page 260 it mentions the Mayor does not have power to direct businesses so CIWM asks how is the ambition of food waste and six main recyclable materials collected consistently to be encouraged for businesses. CIWM is aware anecdotally of operators who are less than willing to implement separate



collection for clients that ask for it, although the main reason for low separation in London businesses (if at all) is often given as lack of appropriate space.

Food waste collection can currently be prohibitively expensive, as there are likely to be few collections. The more food collections made the lower the cost per unit offered by the operator – a win-win situation. Any fundamental changes have to ensure there is sufficient capacity to treat the collected material and plenty of lead-in time for those affected to respond.

Through the WRAP Food Waste Recycling Action Plan (FWRAP) there is work looking at how to engage businesses and some of this work is being led by ESA (Environmental Services Association) to encourage their members to spread the message about food waste collections and the reasons businesses should consider it as a separate collection. Alongside the FWRAP piece of work the Bio Quality Protocol group produced a guidance note for businesses on reducing contamination in food waste collections.

*3. Do you think the Mayor should set borough specific household waste recycling targets?*

CIWM welcomes the discussion around target setting. It is good to see the consideration of carbon based targets. This is a very useful start but it should also be recognised that there are other impacts other than climate change and while carbon targets are probably a good yardstick, other life cycle impacts such as human toxicity, resource depletion, water use, etc. should be acknowledged.

CIWM is disappointed there is no mention of a residual target but much is made of reuse and repair to reduce the amount of waste that is sent for disposal. CIWM suggests one of the targets set under this Environment Strategy is a residual waste target (perhaps a measure of kg residual household waste per household per year).

Figure 42 shows an increase in arisings in 2030 – as the London Environment Strategy has set out to increase reuse and repair its success should reduce overall arisings – surely that is the aim.

CIWM is aware already that to achieve an overall percentage rate some individual percentage rates have to be higher. As for Borough specific recycling targets, CIWM believes that to achieve an average percentage target across London, some boroughs will have to exceed the overall percentage target, and in this period of austerity it's not clear what will encourage them to go the extra mile.



CIWM suggests that the Mayor seek to ensure any Borough specific household recycling targets are not blunt weight based targets but take account of carbon impacts too.

CIWM supports greater use of combined heat and power (CHP) in London, whether from well-engineered energy from waste plants (EfW) or other forms of heat and power generation.

CIWM believes the definition of recycling used in London should ideally be consistent with the England/UK and EU definitions, including counting ash metals from EfW in recycling rates below (proposal 7.3.2b).

#### *4. What needs to happen to tackle poor recycling performance in flats?*

CIWM is aware of plenty of research ([WRAP](#), [OU](#), [MEL](#), [Defra](#)) that has covered this area and welcomes the offer through Resource London to support and fund local authorities achieving the proposals set out in this Strategy for flatted properties.

There is also [guidance](#) aimed at improving waste management in areas such as the domestic rented sector produced by LWARB and LEDNET. LWARB also produced guidance on [planning](#) for new flatted properties.

CIWM is aware that much of the work on flats appears to miss out waste prevention and re-use activity. This may be an area the Mayor concentrates effort to minimise waste arisings which also leads to a more sustainable London.

The issue of a transient population has been covered in the Strategy and this is one of the difficulties of flatted properties, along with limited space. CIWM will support the work of LWARB, and assist wherever appropriate with learning/knowledge from its networks.

Behaviour of residents in flatted properties will also be influenced by their priorities and providing for their family – food, clothing, heating etc. is likely to be a high priority. Research in [Scotland](#) looked at the performance of seven schemes in multi-occupancy properties. There are examples of how some local authorities have helped residents by [working with land managers](#) to encourage recycling.

#### *5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?*

Users decide not to use reusable bottles for example if there is no real place to refill a container. You fill it up in the office but by the time you have used the



contents are you going to be near somewhere to refill it? Some people do not feel comfortable just asking for their container to be filled in a crowded café or hotel foyer.

To get around the feeling of discomfort knowing there is somewhere that is more than willing to fill your container would be a great incentive. [Refill scheme](#) is a national, practical tap-water campaign where supporting retailers – cafes, restaurants, shops, hotels and local businesses – fill up containers for free. Participating businesses display a sticker so that users can see where they can refill their reusable bottle/cup. There is also an app available to find participating sites.

CIWM believes that although water bottles and coffee cups are a very visible arising on the street it is a tiny fraction of the overall waste arisings. Being so visible will hopefully mean that changes made here will have a positive knock-on impact on other (more significant) waste streams.

CIWM also suggests a watching brief on the deposit return scheme proposed for Scotland and the Mayor considering working with Scottish authorities to trial something similar in the future. The Mayor will need to keep close watch on the DRS proposals by Defra and the responses from the current [consultation](#).

*6. Please provide any further comments on the policies and programmes mentioned in this chapter.*

<b>Proposals</b>	<b>CIWM comment</b>
Proposal 7.1.1.a The Mayor will support campaigns and initiatives to prevent food going to waste	CIWM endorses this proposal and through its networks will help spread the message.
Proposal 7.1.1.b. The Mayor will support campaigns and initiatives to cut the use of single use packaging	CIWM endorses this proposal and through its networks will help spread the message.
Proposal 7.1.1.c. The Mayor will support campaigns, initiatives and business models to reuse materials	<p>CIWM is pleased to see the support for Restart Project which helps WEEE back into the market by demonstrating to users what is wrong with the item and how to fix it. There are also workshops where those that can repair such items show others how to.</p> <p>This is going some way to combating the built in obsolescence that occurs with most electronic equipment.</p>



<p>Proposal 7.1.1.d. The Mayor will lead by example to cut waste and encourage reuse through the GLA group's operations and procurement activities</p>	<p>CIWM endorses this proposal.</p>
<p>Proposal 7.2.1.a. The Mayor will set targets for local authority collected waste, a minimum level of service for household waste recycling collections and hold a contractor register of waste authority waste contracts</p>	<p>CIWM supports the link to the work by WRAP on consistency of collection materials by suggesting a minimum level of service for household recycling collections.</p> <p>Having a register of contracts will also feed into any partnership working along with any financial and environmental gains that could be made by such partnerships.</p>
<p>Proposal 7.2.1.b. The Mayor will support efforts to increase recycling rates in flats</p>	<p>CIWM welcomes this support. Further comment can be found in our response to question 4.</p>
<p>Proposal 7.2.1.c. The Mayor, through LWARB's London Business Waste Recycling (LBWR) service, will support waste authorities to boost commercial reuse and recycling performance</p>	<p>CIWM endorses this proposal.</p>
<p>Proposal 7.2.2.a. The Mayor will support efforts to consolidate commercially collected waste services to improve recycling performance, reduce congestion, improve the public realm and improve air quality</p>	<p>CIWM assume this will be performed under the LBWR service for local authorities. Tackling the service run by private operators is a more sensitive issue.</p> <p>CIWM is pleased to see mention made of the use of an electronic system for duty of care and fully supports this idea and is happy to work with the Mayor's office and associated organisations on this topic.</p>
<p>Proposal 7.2.2.b. The Mayor will support local authorities to reduce littering and fly-tipping by working with government on the implementation of its Litter Strategy for England</p>	<p>CIWM welcomes this proposal and suggests the Mayor engages with the National Fly-Tipping Prevention Group (NFTPG) as well as the Chewing Gum Action Group (CGAG) which are sub-groups of the Litter Strategy for England.</p>



	<p>CIWM suggests work on cigarette butt litter needs to be a higher profile.</p> <p>CIWM supports the Right Waste Right Place campaign and is pleased to see that the Mayor will use the campaign to promote duty of care to waste authorities and businesses.</p>
<p>Proposal 7.3.1.a. Waste authorities must demonstrate how they will transition their waste fleets to low or zero emission options, prioritising the phasing out of diesel</p>	<p>CIWM fully endorses this proposal as this builds on the congestion charge (reducing the number of vehicles that have to enter London) by ensuring those vehicles that must be present to deliver a service, contribute to the clean air policy.</p>
<p>Proposal 7.3.b. The Mayor will work with stakeholders to encourage a reduction in municipal waste transported by road and will increase its transportation by rail and river</p>	<p>CIWM fully supports this proposal for material that cannot be handled locally, as this will also go some way to reducing congestion and air quality at pinch points on London's roads.</p>
<p>Proposal 7.3.2.a. Waste authorities in delivering their waste management functions are expected to demonstrate how they can meet the GHG Emissions Performance Standard (EPS)</p>	<p>CIWM welcomes the Mayor's offer of guidance for meeting the EPS and asks what the timeline for this guidance is.</p>
<p>Proposal 7.3.2.b. Waste authorities must demonstrate how solutions generating energy from waste meet the carbon intensity floor (CIF), or put in place demonstrable steps to meet it in the short-term</p>	<p>CIWM fully supports the energy from waste requirement to have heat and power generation. This has to be developed in conjunction with district heat networks.</p>
<p>Proposal 7.4.1.a. Waste authorities in developing their waste contracts and services will need to identify how to maximise the use of local waste facilities and identified sites for waste</p>	<p>CIWM is fully supportive of this initiative but is aware that London has limitations on space.</p>
<p>Proposal 7.4.1.b. The Mayor will support development of new waste infrastructure supporting circular economy outcomes reuse, repair and remanufacture</p>	<p>CIWM welcomes this proposal as there is likely to be a need for home support for resource materials with the planned move by China to enforce</p>



	strict contamination levels on resources exported there.
Proposal 4.2.1e The Mayor aims to reduce emissions from freight through encouraging a switch to lower emission vehicles, adopting smarter practices and reducing freight movements through better use of consolidated trips	The Mayor should build into this the opportunity for reverse logistics in support of the circular economy. This may help balance the cost increase in transport for improving air quality.

