



Ricardo
Energy & Environment



Framing an English circular economy strategy post Brexit– priorities identified by local government

Workshop: Ten things you would say to the UK Government

Report for North London Waste Authority
North London Waste Prevention Exchange 2017

Customer:**North London Waste Authority****Customer reference:**

NLWA North London Waste Exchange 2017

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1 The North London Waste Prevention Exchange - Workshop

North London Waste Authority held their third annual third annual conference – the North London Waste Prevention Exchange on the 16 February 2017. The topic for the conference was ‘The circular economy in a post-Brexit environment: the role of local government and businesses’. Circular economy experts from the UK and abroad explored how best to energise the circular economy in cities, whilst at the same time keeping costs and unnecessary bureaucracy to a minimum.

As part of the afternoon session of the conference, local authority delegates took part in a workshop which explored how local authorities’ input could help to frame an English Circular Economy Strategy post-Brexit. Over fifty delegates joined the workshop to contribute to the discussion and put forward their views.

The workshop was facilitated by Ricardo Energy and Environment. Context for the discussion was provided by Mark Ash of the East London Waste Authority, who presented the views of the Joint Waste Disposal Authorities. This was followed by a short presentation by Sarahjane Widdowson of Ricardo Energy Environment, which provided an overview of the key points, applicable to local authorities, within the proposed Circular Economy Package.

The output from the workshop is two reports. The first (this report) provides the full discussion points from the workshop and the second, shorter report, provides 10 messages for government. NLWA is likely to use both the short report and this longer report to inform its response on relevant consultations including the Mayor of London’s forthcoming London Environment Strategy.

1.1 Workshop Format

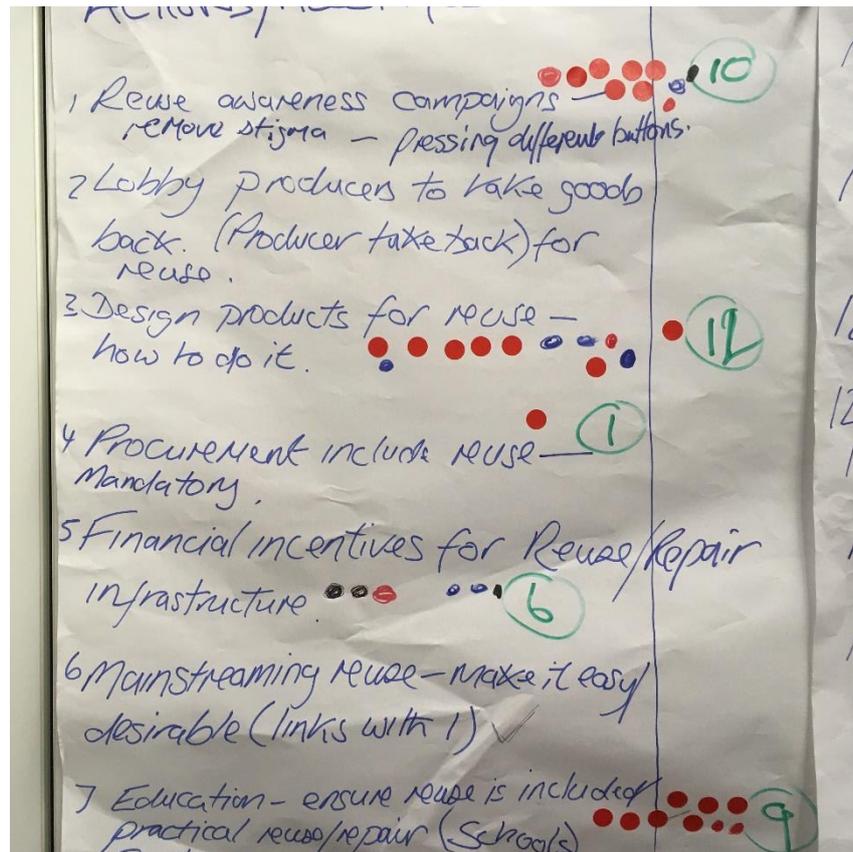
Delegates attending the afternoon workshop were asked to consider how English Local Authorities can frame an English Circular Economy Strategy post Brexit. Delegates started with an assumption that the current proposed package would be implemented and were asked to reflect on the targets and proposals: were they appropriate and what should the UK be implementing? Six circular economy themes were used during the workshop to frame discussion:

- Extended producer responsibility and product design
- Re-use
- Dematerialisation/servitisation
- Green procurement
- Recycling targets
- Recycling capacity/market development

To ensure that all delegates were able to put forward their views during the two-hour workshop small discussion groups were created, each with approximately nine people per table (six tables in total). A carousel format was utilised, with a facilitator per table stimulating discussion on one of the six themes. At the end of an allotted time period the facilitator would move tables taking the themed notes to the next group, which would then review the notes and add to, agree or disagree with the comments made by previous groups.

At the end of the workshop, everyone was provided with three vote stickers per theme and asked to allocate their votes between the issues they felt were the highest priority (Figure 1). Votes could be cast singly or all three could be cast against one issue for something that was felt to be very important. The votes were counted and the top two actions/messages per theme were then identified and fed back to the delegates.

Figure 1: Voting sheet for reuse and repair



The commentary from the workshop discussion has been detailed within this report. The six themes were used as a framework for discussion and analysis of the results has shown that many of the actions/messages discussed ran across a number of themes, such as obtaining a clear direction on Circular Economy from Central Government. The majority of delegates attending the workshop were Local Authority officers from London and the surrounding areas and as such, the commentary reflects some of the issues that are unique to Local Authorities and often to London.

From the analysis, ten messages to the UK Government on framing a circular economy package, post-Brexit, have been distilled. These are presented at the end of this report and in a separate report which NLWA will use to inform its response on relevant consultations, including to feedback on the Mayor of London's forthcoming London Environment Strategy.

Due to the length of the workshop the discussion focussed on capturing good ideas. For some of the ideas proposed such as use of a carbon metric further analysis would need to be conducted to ensure appropriateness, deliverability and consistency of implementation.

2 Extended Producer Responsibility and Product Design

If products can be better designed to last longer (increased durability), contain less environmentally damaging materials and also be designed for disassembly or reprocessing, it would be easier to keep those products and their material constituents circulating within the economy for longer.

2.1 Discussion points

- Producer responsibility needs to encompass the entire lifecycle of the product, from manufacture to disposal

- There needs to be a visible methodology to determine the net environmental impact of products, enabling consumers to make informed purchasing decisions
- Producers need to be incentivised to minimise the environmental impact of their products
- Funding needs to be generated to provide stability to the reprocessing market, providing a baseline minimum value for secondary materials, ensuring sustainable markets for recycle
- Closing the loop by ensuring producers/manufacturers have visibility of the entire lifecycle of their products
- Facilitate communication of environmental messages to consumers through a standard 'environmental ratings' system
- Extending producer responsibility and product design will:
 - Ensure producers are responsible for their products from design to disposal
 - Create stable markets for secondary materials
 - Pricing differentials based on net environmental impact of products will create a market incentive to promote CE principles
 - Better information to consumers will facilitate environmental messaging

Local Authority role:

- Lobbying Central Government to introduce:
 - A sales tax based on net environmental impact of products
 - A 'standards board' to assess the net environmental impact of each product
 - A clear labelling system which identifies the environmental rating of each product
- Engage in local campaigns to highlight the net environmental costs of consumers' purchasing decisions
- Facilitate local options for reuse/repair/exchange, with emphasis on Circular Economy principles

2.2 Key messages and votes

Action / Message	Number of votes
<p>Sales taxation to be introduced based on the overall environmental impact of each product</p> <ul style="list-style-type: none"> • This creates a direct incentive for producers to design in minimal net environmental impact • The taxation raised should be utilised to provide a minimum value for recycle and secondary materials, providing a degree of stability to the reprocessing sector • Provides a financial incentive for consumers to incorporate environmental considerations into their purchasing decisions • Will have an increasing impact by developing an incentive for producers to incorporate environmental design into their processes to maintain or increase market share • The concern was raised that government may consider this a 'burden on businesses. However, it is in line with the Extended Producer Responsibility element of the CEP 	21
<p>Product Design should be added to the top of the waste hierarchy</p> <ul style="list-style-type: none"> • This would ensure that producers consider the environmental impact of products from the design stage and emphasises the need for a holistic approach in line with CE policies 	16

Action / Message	Number of votes
<p>The 'Environmental Product Tax' should be related to the life of the product as determined by the length of warranty available</p> <ul style="list-style-type: none"> This would de-incentivise planned obsolescence, improve reparability and create market incentives for consumers based on value for money considerations 	6
<p>Product design should incorporate costings to allow for the entire lifecycle of the product, including collection and disposal</p> <ul style="list-style-type: none"> De-incentivises planned obsolescence Encourages reparability Ensures producers consider cost of Local Authorities collection and disposal May encourage deposit schemes, repair and reuse facilities 	5
<p>A Standards Board should be set up to allocate an environmental rating to products</p> <ul style="list-style-type: none"> This would be similar to the current Energy Efficiency ratings applied to electrical products, houses and commercial buildings The ratings would need to cover entire lifecycle costs The rating scheme would need to be relatively simple to ensure consumer engagement The methodology would need to be sufficiently transparent to ensure buy-in by producers and engagement with consumers 	2

3 Reuse

Many Local Authorities actively promote reuse activities and also provide services to facilitate reuse, particularly for items such as furniture. One of the key elements of the Circular Economy is to recirculate resources within the economy and maximise resource productivity. For Local Authorities, reusing products can provide economic, environmental and social value.

3.1 Discussion points

Develop a national reuse awareness campaign

- Remove stigma from buying second hand goods
- Ensure campaigns target all sectors of the community (pressing different buttons)
- Mainstream reuse as an everyday activity

Lobby for producer take-back schemes to repair / reuse products and put back on the market or reissue to the original owner

- Lobby producers to take back products and repair them to be resold or returned to customers
- A shared economy should result in manufacturers taking responsibility for reuse / repair of products

Encourage products to be designed for reuse/ repair

- Develop 'How to do it' guides to empower people to be able to repair products
- Provide skills / training for householders to repair goods
- Manufacturers should release patents for obsolete goods so that repair can be made easier
- Encourage the use of extended warranties for products

Promote green procurement to increase the use of reused/ repaired items

- Include reuse into public sector contracts e.g. when procuring office furniture, make it mandatory that government (National and Local) procure products that have been reused/ repaired

Include reuse/ repair in the curriculum

- Include reuse in the curriculum, enabling children to pick up basic repair skills at an early age e.g. Have toy days where children bring in toys that are broken and spend the day 'fixing' them

Set reuse targets

- Set targets for reuse based on carbon metrics
- Any targets should identify the wider benefits, environmental, economic and social

Develop reuse/ repair infrastructure

- Build upon the present retail reuse/ repair infrastructure
- Ensure that local development plans incorporate provision for reuse/ repair infrastructure

Establish reuse standards

- Introduce / develop national reuse / repair standards in order that shoppers understand the quality of the product they are purchasing. A system of grades could be developed
- Introduce standards for reuse/ repair shops, similar to the Scottish Revolve system: Revolve is a re-use quality standard for shops which sell second hand goods in Scotland. It makes it easier, more inviting, and safer for everyone to buy second hand items. When people see the Revolve logo they know they are buying from a re-use shop which is committed to quality and excellent customer service.

Incentivise Reuse

- Local Authorities could provide vouchers for the homeless to buy repair/ reused goods when being housed

Remove VAT from repaired/ reuse items

- In the UK, VAT charged on second hand goods varies depending on the size and VAT status of sellers. Individuals and companies/charities with VAT taxable turnover of less than £85,000 do not have to be registered for VAT so second hand goods they sell online (e.g. via Ebay or Gumtree etc.) or in shops do not have VAT added. However, companies/charities with a VAT taxable turnover of over £85,000 must be VAT registered and all goods sold by them (online or in shops) will have VAT added even though VAT may have been charged on them previously. This means that, in certain circumstances, VAT can be paid twice on some repaired/reused items
- Sweden has introduced tax breaks on repairs to clothes, bicycles, fridges and washing machines. On bikes and clothes, VAT has been reduced from 25% to 12% and on white goods consumers can claim back income tax due on the person doing the work. The scheme is expected to cost around \$54 million in lost taxes, which will be more than outweighed by income from a new tax on harmful chemicals in white goods¹.

¹ <https://www.weforum.org/agenda/2016/10/sweden-is-tackling-its-throwaway-culture-with-tax-breaks-on-repairs-will-it-work/>

3.2 Key messages and votes

Action / Message	Number of votes
Encourage products to be designed for reuse/ repair	15
Develop a national reuse awareness campaigns	10
Remove VAT from repaired/ reuse items	10
Establish reuse standards	9

4 Dematerialisation/Servitisation

Our society is changing quickly and in many areas there has already been a transition from buying a product to buying a service. Examples of this 'dematerialisation' include: no longer purchasing CDs or DVDs but subscribing instead to music and film streaming services; not buying cars or bikes but subscribing to a car club service or hiring a bike from a local scheme; and not buying power tools but hiring them instead. Within this theme, as well as servitisation, reducing or simplifying the materials used for packaging products was also discussed.

4.1 Discussion points

4.1.1 Servitisation

Servitisation (i.e. buying services instead of products) is important for Local Authorities as they have the ability to lead by example by purchasing services for their premises and operations (e.g. lighting, leased office equipment etc.). However, there are important considerations around changing to this model, namely:

- Costs to purchase a service may be higher than purchasing the products that the service would replace. Any additional costs need to be balanced by a saving in staff time as a result of purchasing that service
 - There will be a need for members of staff to monitor contracts over the whole duration of the service, which may have implications in terms of added cost and internal training for staff
- It will be important to engage households and local businesses to share the Local Authority's experience and help promote the use of services over products. Local Authorities could have a signposting role here
- Central Government will also need to lead by example and engage the public. It is important for Local Authorities to know what Central Government is doing in this area, whether they have any targets currently or planned and how they are measuring their performance
- There is a risk that by procuring integrated services, business is being driven to the large suppliers and not small local businesses. However, if there is demand from Central and Local Government, the market can be gradually influenced to provide better offerings for services over products,
- Another potential risk is site security (by having too many contractors on Local Authority premises at any time, providing different services) and there are concerns that servitisation may cause waste composition to change over time, which could have an effect on waste collection, treatment and disposal
- Quick wins could include white goods and photocopiers within Authority buildings, as well as white goods within Local Authority-owned housing stock

4.1.2 Dematerialisation

Dematerialisation (i.e. reducing or simplifying the materials used for packaging, as well as the transition from product to service) is important for a Local Authority as packaging often ends up in the kerbside recycling or residual waste stream. Dematerialisation could be driven by a Code of Practice, which would be national and could be led by an organisation such as WRAP. A national campaign could help engage supply chains and promote eco design and reusable packaging. Furthermore, reporting could be made mandatory (part of CSR reporting) and different taxes for producers/manufacturers/retailers could apply, depending on the types of materials or amount of materials used. All of these things could help phase out materials that are very hard to capture and recycle. On a local level, there could be league tables for the best and worst local businesses.

- Consistency across Central Government on these issues would be beneficial so that guidance, strategies and campaigns are harmonised
- Regardless of the type of activity selected, it is important for Local Authorities to promote good case studies. A national communications campaign on circular economy with a focus on servitisation/dematerialisation would be useful. For servitisation and sharing models, a national campaign would help reduce any potential stigma of not owning an item. It would be important to have some Central Government funding for communications in this area
- London is too large an area, so it may be easier to work in smaller hubs. Local Authorities and specifically, Elected Members, can help stimulate and/or facilitate local action groups and expose the myths around servitisation that potentially stop people from switching to it. Local platforms for exchanging items could be facilitated and a National campaign would also be possible
- A mapping exercise of available services within the Local Authority could be useful and could be linked to a campaign that promotes the use of services. However, the challenge for Local Authorities is to make it sound appealing and economically beneficial. So it might be better to take a bottom-up approach with local groups and brands promoting it that rather than Central/Local Government
- Incentives for prevention activities would be important as Local Authorities could incentivise their residents to use services and purchase products with less packaging. Central Government funding could help make this happen

4.2 Key messages and votes

Action / Message	Number of votes
National Code of Practice and incentives (voluntary) or legislation, taxes and reporting (mandatory) on dematerialisation would be welcomed by Local Authorities	17
Local Authorities can lead by example on servitisation but there are some important considerations and Central Government should also lead by example on this	10
Harmonisation of Central Government guidance for Local Authorities is key. National campaign for dematerialisation involving supply chain engagement should be led by one central body	7
It would be good to promote good case studies of best practice in servitisation/dematerialisation in a Local Authorities context, but they need to be made appealing to the general public	4

5 Green Procurement

Local authorities purchase a large number of goods and services. Implementing green procurement could assist with dematerialisation and ensure that resources are kept within the economy for longer.

5.1 Discussion points

- Wide range of suppliers – makes it more affordable (but cheaper is not always better in the long-term)
- Change procurement criteria – some suppliers don't match policy requirements and therefore are not able to be used, even if they are the most sustainable
- Central Government needs to create an environment where these new industries can set themselves up sustainably (tax reliefs, seed funding etc.)
- Nationally recognised standards to define what qualifies as 'Green' – British Standards Institute?
- Should 'green services' have the same standard criteria as products?
- Sufficient legislation to mitigate market price fluctuation and compel manufacturers to not switch to virgin materials if there are price drops
- Lead by example - If Central Government has green contracts it are more likely to encourage Local Authorities to have them too.
- Consider this as a 'transition' concept – green procurement should hopefully be something that is integral to the economy at some point; everything will be eco-designed
- What's already happening? What sustainable suppliers exist? (research) – set up framework
- How can SMEs be used more?
 - Make it fairer for them to be included
- Encourage UK manufacturing (reduce mileage of products)

What is role of Local Authorities?

- Sustainable policies
- Bringing together the knowledge from different areas to think about whole life cycle
- 'Tick list' of what is important when procuring – e.g. food waste generated. Standardisation
- Making sustainable procurement choices affects the private sector in a positive way
- Address whole life costs rather than just initial cost. Cost benefit analysis
- Bulk purchasing across internal departments and other Local Authorities
- Look at hiring/sharing instead of procuring or consider servitisation
- Ask if it is needed in the first place – is there really the need to buy it?

5.2 Key messages and votes

Action / Message	Number of Votes
Legislation to compel producers (fit for different types and sizes of company)	15
Nationally recognised standards (products and services) – what is 'green'? Carbon metric? A check list? BSI? BREEAM?	7
Make it easier for SMEs (which is where the innovation is happening) to get on procurement framework (make procurement procedure less demanding?)	6
Central Government set example, lead the way	5

Action / Message	Number of Votes
Sustainability as a criterion for Local Authority procurement	5
Develop a standard procurement framework (including entire lifecycle costs e.g. purchasing, use, disposal)	4
Joint procurement – encourage it (e.g. share equipment)	4
Minimum standards laid down for products/services	2
Need a way to compare sustainability of products/services	2
Green sector needs stimulating/support – e.g. 1 st year tax relief	2
Invest in UK manufacturing, production, etc.	0
Voluntary agreement developed	0
Responsibility for supply chain	0

6 Targets

The Circular Economy package sets high targets for both household and packaging waste. It is widely thought that England (and in particular London) will struggle to reach the upcoming 50% recycling target for household waste by 2020. Although recycling is one aspect of the circular economy, the priority focus should be achieving the best environmental outcome for the use of all materials. Current weight based-targets can be perverse with heavier materials such as garden waste targeted for collection rather than following the waste hierarchy and treating this waste in-situ.

6.1 Discussion points

Producer responsibility

- The onus should be on the private sector and Extended Producer Responsibility (EPR) should play a stronger role, particularly for difficult to recycle materials
- A concern was raised that if producer responsibility increases then local authorities would be left with difficult to manage materials that contain little value. Any changes to EPR should take into consideration the local authority role and potential cost burden

There should be no targets at all

- Although this would allow local authorities to set their own agendas and choose the most appropriate environmental outcome for their area, with restrictions to local government funding, waste services may not be priorities. The targets do provide a framework against which to work and to compare and monitor performance

National messaging – consistency, harmonisation

- The recent work on harmonisation was broadly welcomed but it was felt that Central Government should support and fund national messaging

Funding for retrofitting old housing stock

- For London in particular local housing infrastructure may not be conducive to implementing recycling systems. Additional funding for this may allow local authorities to invest in retrofitting old housing stock (Hackney Council have conducted some of this recently)

Residual targets and funding including Pay As You Throw

- A target for the residual element of the waste stream would focus attention at the top of the waste hierarchy and highlight levels of consumerism per capita. To fully achieve this, options such as Pay As You Throw (PAYT) should be considered so that there is an economic driver for waste reduction

Carbon targets

- Carbon targets allow a holistic view of environmental performance and were favoured by many delegates. It was felt that there was a need for a carbon target to be considered with other elements initially so that the public could be engaged and informed about the metric. Implementation of a carbon target would require broad agreement and a consistent approach to the systems and boundaries used for analysis, this was not discussed in detail during the workshop.

National compulsory recycling

- High recycling targets will be difficult to achieve. A strong message from Central Government that recycling is compulsory may facilitate behaviour change. Residential responsibility needs to be increased

Smart targets and Localised targets with bonus/incentives

- If weight based targets are retained then they should be smarter. Localised targets should also be considered where local authorities are asked to achieve percentage improvements rather than attaining an absolute figure. Any targets need to be supported by additional funding and potentially sanctions

Redefine Local Authority Collected Waste definition – include Commercial and Industrial

- One option for delivering on the proposed targets would be to redefine our current definitions for Local Authority Collected Waste (LACW) to include Commercial and Industrial (C&I) waste. Data and the current market set up for C&I waste would present a challenge and Central Government would need to invest strongly to achieve this

Material-specific target

- Instead of an absolute target for recycling, individual material streams should have their own target. This could include packaging waste. The streams would be linked to the best environmental option for that particular material

6.2 Key messages and votes

Action/Message	Number of votes
<ul style="list-style-type: none"> • Carbon targets (a move away from weight based targets to carbon) <ul style="list-style-type: none"> ○ Need to be considered with other elements (levers) 	11
<ul style="list-style-type: none"> • Residual waste targets including PAYT <ul style="list-style-type: none"> ○ Funding would need to be made available to support this 	9
<ul style="list-style-type: none"> • Localised targets (per authority) with bonus/incentives 	9
<ul style="list-style-type: none"> • Removal of all targets 	7

7 Capacity and Market Development

The proposed Circular Economy package sets high targets for recycling both household waste and packaging. Ensuring that infrastructure is in place to collect and reprocess will be important to support these targets and local authorities have a key role to play in this.

7.1 Discussion points

- Materials market needs to be sustainable
 - Making sure there is a market for collected materials
 - Managing price variability
- Matching collections with re-processor demand
- Linking re-processors with designers is important
- Environmental impact of wasted materials should be highlighted
- Closing the loop - collection and reprocessing
- Recycling targets are important to ensure materials are available for reprocessing
- Political stability helps market stability
- Residents must buy into the importance of the circular economy
- Market collapse is costly and lowers morale of residents if materials cannot be recycled
- Quality is king

Local Authorities specifically have a role in:

- Lobbying Central Government to create the necessary legislation that forces manufacturers to produce recyclable goods.
 - This will help to drive consistency and harmonisation
- Engaging with industry to communicate opportunities available and challenges faced
 - Ambassador role
- Help identify recyclables / waste streams. Provide supporting data
 - Communications - up and down the chain
 - Communicate the real cost of not recycling

7.2 Key messages and votes

Action / Message	Number of votes
Clear policy direction / new waste strategy <ul style="list-style-type: none"> • There needs to be central leadership on waste strategy that would provide re-assurance to designers, re-processors and collection and disposal authorities. • This should be linked up with National Infrastructure strategy 	18
Producer responsibility <ul style="list-style-type: none"> • Link producers with the collection of their materials • Encourage deposit schemes • Producers should pay for / manage schemes to take the cost burden from Local Authorities 	12
Subsidy for secondary materials <ul style="list-style-type: none"> • There needs to be a subsidy / fiscal lever or tax break for secondary resource 	10

Action / Message	Number of votes
<p>products to provide some form of stability to encourage producers to reduce their use of virgin materials</p> <ul style="list-style-type: none"> Perhaps this should be a hierarchy of tax? Or requirements to use a certain % of secondary resources <ul style="list-style-type: none"> Linked to this, a database or list of preferred materials e.g. specific polymers would be useful. This could be brought into the Industrial Strategy 	
<p>Business recycling targets</p> <ul style="list-style-type: none"> There is a need for data on business waste and corresponding targets Potentially a varied Landfill tax for businesses Any tax money should be ring-fenced for encouraging 'good' behaviours such as subsidies 	7
<p>Encourage difficult recycling markets</p> <ul style="list-style-type: none"> There needs to be support to create new recycling markets as well as dissuading the use of 'bad' materials via taxation 	4
<p>Market research on resource exports / flows</p> <ul style="list-style-type: none"> There is a need for national data on exports, generation and re-use. Can this be collated from MRFs? Why is material being exported? Are there opportunities to use domestically? What is the national picture? 	3
<p>Pay as you throw</p> <ul style="list-style-type: none"> Local Authorities should be given greater control over waste reduction 	2
<p>Communications campaign</p> <ul style="list-style-type: none"> Linked to collection types, Government should sponsor hearts and minds campaign to explain the need/impact for recycling – not just 'environmental' the real cost. Use focus groups to focus message 	1
<p>PRN / PERN</p> <ul style="list-style-type: none"> How can we retain the materials? What is the difference between value of materials in this country compared to export gate fee 	0
<p>Ensure reasonable re-processing provision</p> <ul style="list-style-type: none"> This point was debated. Some participants felt government should take steps to ensure reasonable provision was put in place/ remained in place. Others felt this was not market-led and unsustainable. Instead steps should be taken to highlight to industry what was in place / where the gaps were. 	0

8 Top Ten Messages

After reviewing the voting from all of the themes, the messages with the highest number of votes (in no particular order) are:

- A national code of practice for dematerialisation of products
 - This could include incentives, legislation, the ability to raise taxes from activity and reporting
- A focus on designing goods for reuse and repair
 - This could include both working with designers and manufacturers and also empowering citizens to repair products
- Product design should be added to the top of the hierarchy as a component of waste prevention
 - This would ensure that producers consider the environmental impact of products from the design stage onwards
- Removing or reducing VAT from repaired / reused items
 - This has worked well in Sweden and could be adopted in the UK
- Sales taxation to be introduced based on the overall impact of a product
 - This would create a direct incentive for producers to design in minimal net environmental impact
- Leadership from Central Government with clear policy direction and a new waste strategy that is linked to the national infrastructure strategy
 - A clear direction of travel would encourage investment and provide confidence to the sector
- Enhanced Producer Responsibility for products
 - The current regime should be extended to encompass more products and designed in a holistic manner (with integrated collection) so that Local Authorities are not subject to a potential cost burden
- UK Government to lead by example on green procurement and to consider legislating for all public sector organisations
 - This would encourage producers to design and manufacture green products and ensure that all purchases consider environmental impacts
- Move away from weight based targets for measuring the recycling performance of Local Authorities
 - Metrics such as carbon or residual waste production would provide a fairer reflection of environmental performance and help to level the playing field between urban and rural authorities
- Consider using Carbon targets as a universal metric for recycling performance
 - The use of carbon would allow Local Authorities to make more holistic decisions regarding recycling and reuse and to prioritise overall environmental performance and the capture of resources. This would require broad agreement and consistent approach to the systems and boundaries used for analysis.

These messages to UK Government will inform NLWA's response on relevant consultations including to feed back on the Mayor of London's forthcoming London Environment Strategy.



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