# ADEPT Waste Group, 20.03.19

**Attendees**: Steve Palfrey, Kate Hand, Sonika Sidhu, Teresa Mitchell, Gurbaksh Badhan, Karyn Punchard, James Potter, Annette Dentith, Hannah Bartram, Joel Hull, Dave Bavan (Senior Analyst, EA)

**Stakeholder updates**

* ADEPT Environment Board. ADEPT will be doing more on climate change, including through the LEP.
* ADEPT Newsletter. 27th June: AGM and Annual Awards; seminar for corporate partners on climate change next week. Strategic priority: post-Brexit funding, climate and environment, communities and place.
* Defra. No update.
* Environment Agency. China import restrictions work ongoing. Dover Port and port disruptions are key EU exit. No blanket exemptions will be brought in. EA are in instant management mode – similar to e.g. floods – in order to manage risks of stockpiled waste. Fairly confident that RDF could be put in landfill if worst case. Ensuring equivalent standards of recycling in other countries we export to has always been a weak link; EA working on this, which aligns with PR reform. Working on relevant RWS strands – e.g. new carrier-broker-dealer regime.
  + Meeting last Monday on EU exit with EA; concern that planning regime aspect of managing Brexit waste as well as permitting regime (i.e. using more LA resource than agency resource) – i.e. retrospectively applying for permission for sites that have sufficient capacity. Although operationally there is an ability for free-flow to carry on post-Brexit, but we’re still not clear on how the EU will treat us as a block.
    - **ACTION: Dave** to query with EA and feed back
* LGA. In listening mode. Joint meeting 9th April with local government colleagues. Re industry engagement, Nestle message is simply that they want quality material – hence support for DRS. They acknowledge that e.g. pouches then become a more expensive product for LAs. They need clean enough material that they can meet the new 30% recycled requirement – and thus DRS. Sonika happy to share their response with e.g. network chairs, once signed off.
* WRAP. No comment.
* CWIM. No comment.

**Resources and Waste Strategy**

ADEPT approach

* Understand the whole package
* Support rather than criticise – not run against tide
* Provide evidence – tonnages and finances
* Lobby against the bad proposals – bad for communities and LAs
* Liaise to get a collection LA voice
* Provide a strategic, place-based perspective. Not just a waste-based approach; similar to LEDNet’s approach – place, climate and environment as well as waste.

EPR

* LA job to provide evidence that the scope should be broad – FNCR should include fly-tipping
* Thinking about practical implications and transitional costs
* Governance options.
* Tim Lewig (Defra SPAD) – coming to LGA conf to talk about option 4.

Option 1: discount – same as existing system

Option 2: people positive about this.

Option 3 poor because you need business waste to be included, and with this you have to operate two different systems. London likely to be more positive about this.

Option 4: not enough detail; too theoretical and won’t work in practice; it’s predicated on failure – the money in the system is provided by levies that aren’t collected. That means no certainty around the funding for LAs and difficult to invest. Too complex – the shift to EPR is hard enough. Common ground on this position on option 4. But does option 4 drive better outcomes overall/ in the long term?

Concern that the net payments will be worked out based on materials prices that are not set, which means that LA are let with the risk. SP – the ideal is that the material is owned end to end by producers, so they take this risk – this is ~ option 4. So we become an agent in the system. The producers become our customers. Subliminal text behind option 4 is eventually that LA collect residual and producers do all the packaging etc. Move towards regionalised franchising of collection with waste companies – e.g. Nestle/ Veolia partnership.

Defra thought to prefer option 3 as offering greater benefit. So we need to identify the differences between 2 and 3. We can make a case for being business recycling collector of choice…

What is our topline messaging around how we stop them giving us less RSG when we get money for waste? LGA line is that local govt are putting money into waste currently, and any money that is freed up is still LG money (council tax, business rates).

Note that its disappointing that there’s no more detail in all areas. We’re being funnelled…

You need to address the gaps in the system.

**Consistency**

Core set: do we agree? Are there additional ones we’d want – i.e. we want tetrapack in from the beginning? Or would this just lead industry from moving away from tetrapack. Modulated fees support survival of fittest – thus moving away from tetrapack. Yes to core set, with regular review. Felt to be a min set of materials, not a max. Again this is a driver towards kerbside sort…. Because comingled has worse quality, and if we’re being paid on the basis of quality of MRF output.

Flats – exceptions, enforcement.

**ACTION: Kate** to get back to Waste group with more on flats and what we’d want thier support on.

Think about potential role of statutory guidance in dealing with collection methodology.

Strategic point: do we advocate for a restriction on our ability to collect/ the ways in which we collect? Feeling that we can’t sign up to a specific methodology around collection, but that the end game is quality and thus unless we can prove that comingled can provide the high quality… and we’ll therefore have source separate imposed on us to deliver quality. We won’t get local choice. Conflicting views about how you secure high quality in terms of tech processes**.** We need to take a strategic view on whether we accept democratic limits to secure higher quality. ADEPT will go for quality outcomes delivered how authorities determine is best. ADEPT agreed that collection methodology should not be prescribed.

New burdens: depends on what you’ve prioritised locally; statutory guidance doesn’t have the same criteria for new burdens as legislation.

Frustrating that govt are blocking moving to e.g. three-weekly residual. We need producers to raise this.

The only way you can make food waste work is by reducing residual.

Garden waste is not necessarily best environmental outcomes, or best on VFM grounds; we can provide evidence is what the cost will be is they want to do this – show that WRAP evidence is out of date. Regressive. Re cross-funding – you can’t fund it via EPR.

Statutory guidance: no, make the legislation clear.

**ACTION**: **Sonika** to share detail from Defra re the Environment Bill.

Non-binding performance indicators: ADEPT members are broadly supportive… assuming the original baseline numbers are correct, so that we know where we should be. So overlaying basic info with context. Slight worry that this will be a way of categorising authorities, and then if we end up in the wrong category we’ll be in a pickle trying to deliver the generic standards for this category.

LA collaboration: repeat messaging from ADEPT position. Two-tier authorities need to have a separate conversation.

Commercial waste: give it the same conditions/ standards as LA waste; LAs see this as an opportunity.

Proposed Key issues for ADEPT regarding a DRS:

* Agree with basic principles of what a DRS should achieve
  + But remain sceptical of overall benefits and especially perceived benefit of all in over on the go
  + See P8 where benefits of all in = 3times benefits of on the go.
    - Concern that assumption of DRS delivering 85% capture of 85% of material is stated as "uncertain area of research". (p8) Need to understand the sensitivity of the assumptions. *Is this all wine bottles?? All sceptical on x10 costs. If most drinks here are multi-packs is it silly to exclude this? Contradiction between non-redeemed ending up as litter vs in kerbside. Reminder that we don’t want to start options/ thinking from DRS – should start from EPR. Could we deliver the separation of glass from everything else by putting it through DRS? But producers don’t favour this because it makes DRS more expensive for them?*
* Funding should be in addition to EPR
  + If DRS is additional net cost then the cost should be born by producers of DRS targeted containers
  + If delivers a net benefit then can be reflected in variation of modulated fee under EPR
* Unredeemed deposits should help fund litter collection
  + Include in sub category under EPR payment
* Very concerned about practicality in rural areas
  + Lack of clarity on how can be made to work in rural areas
  + May have significant impacts on small retailers and/or disadvantage rural communities from accessing deposits
* Any DRS must include for cartons and pouches
  + Need to protect unintended consequences that incentivise the use of containers that are harder to recycle
* DRS should also include for disposable cups
* Preference for on-the-go DRS over all-in
  + Container capacity should be below 700mm to avoid capture of spirit bottles
  + Glass bottles over 700mm largely consumed in the home and collected efficiently
  + Some potential to vary container size to include all plastics but exclude glass?
* Costs to Local Authorities under new burdens need to account for recycling credits.

The ADEPT response will be signed by email by the Environment Board.

**ACTIONS**

* **Ian** to lead the preparation of a draft ADEPT response