

# ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

EC1.1 Enterprise Centre, Coventry Technology Park, Coventry CV1 2TT

## Response to the Defra consultation into:

### Introducing Consistency in household and business recycling collections in England

#### About the EPF

The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually Chartered in environmental practice, science and engineering disciplines.

#### Introduction

The resources and waste sector in the UK stands at a critical juncture. The areas covered in these four consultations – packaging producer responsibility, consistency in recycling collection and the use of financial incentives as a means of encouraging the adoption of more sustainable practices – via a Plastic Packaging Tax and Deposit Return Scheme – are central to the UK's commitment to a more sustainable future. We applaud the ambition of the Resources and Waste Strategy, insofar as it reflects the potential for the UK to take an international lead on tackling environmental challenges by wholly transforming its resources and waste sector.

In considering these four consultations, overarching priorities identified by EPF include:

- insofar as is possible, given the devolved nature of waste policy, the need for a consistent UK-wide policy framework to support the overarching environmental and behavioural change objectives articulated in the consultations
- the need for 'whole system' data and transparency to accurately monitor performance against objectives and targets, to identify and rectify any areas of sub-optimal performance, and to enable cost-effective enforcement – all of which will be critical to success.

#### Response to the Consultation into Consistency in household and business recycling collection

EPF supports the principal objective to move towards greater consistency in the recycling services being provided to consumers and businesses, in order to support an uplift in recycling. Success is dependent, however, on greater consistency throughout the supply chain; without this, the ambition to remove the 'check locally' recycling message on packaging will not happen. Greater consistency across the supply chain includes:

- action by packaging producers to rationalise packaging formats and materials, increase recyclability of packaging, and phase out difficult-to-recycle formats
- consistent sorting and treatment infrastructure across England that is aligned to the "approved list of recyclable packaging", which will be developed as part of the reform of the Packaging Producer Responsibility system
- further work to establish the optimum approach to biodegradable and compostable packaging entering the household waste and household-like waste streams.

EPF supports the proposals for mandatory food waste collections from households and businesses, although these should be mirrored by stronger measures to reduce food waste across the entire food supply chain as outlined in the new Resources and Waste Strategy. However, the cost of these proposals and others, such as the introduction of minimum service standards and the promotion of separate collection, must be adequately funded through the new burdens formula and full net cost recovery under the reformed Packaging Producer Responsibility system. The funding formulas must be fair and take account of legitimate variations between local authorities in the cost of collection and amount of material available, but must also be predicated on service efficiency in terms of cost and material quality.

EPF also supports the renewed focus on capturing recyclable materials in household-like waste generated by businesses and the proposal to make the segregation of these materials mandatory. However, given the likely cost implications for business, it is essential to ensure that there is a level playing field in terms of access to consistent and cost effective recycling services in the same way as is being proposed for householders.

On the question of alignment, EPF notes that there is concern regarding the advisability and cost/benefit of setting up a 'competing' system, in the form of all-in DRS, to established kerbside collection systems which are accessible to everyone and are set to receive significant additional funding to increase efficiency and capture, both through the collection consistency and the Packaging Producer Responsibility reform proposals.

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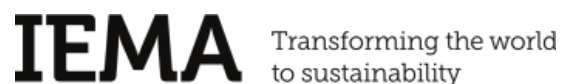
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## Notes

1. The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the

public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually Chartered in environmental practice, science and engineering disciplines.

[www.socenv.org.uk/EPF](http://www.socenv.org.uk/EPF)

2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing around 6,000 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues.

[www.ciwm.co.uk](http://www.ciwm.co.uk)

3. The Chartered Institution of Water and Environmental Management (CIWEM) is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector.

[www.ciwem.org](http://www.ciwem.org)

4. The Institute of Materials, Minerals and Mining (IOM3) is a major UK engineering institution whose activities encompass the whole materials cycle, from exploration and extraction, through characterisation, processing, forming, finishing and application, to product recycling and land reuse. It exists to promote and develop all aspects of materials science and engineering, geology, mining and associated technologies, mineral and petroleum engineering and extraction metallurgy, as a leading authority in the worldwide materials and mining community.

<https://www.iom3.org/>

5. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making.

[www.the-ies.org](http://www.the-ies.org)

6. The Society for the Environment (SocEnv) is comprised of 25 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism.

[www.socenv.org.uk](http://www.socenv.org.uk)

7. The Institute of Environmental Management and Assessment (IEMA) is the membership body for more than 14,000 environment and sustainability professionals worldwide. We support individuals and organisations in setting and achieving globally recognised standards for sustainable practice, in turn driving the development and uptake of sustainability skills. We add value for our members by providing the knowledge, connections and recognition necessary to lead change within organisations at all levels. We are independent and international. We apply the

combined expertise of our members to provide evidence and influence decision-making, working towards our vision of transforming the world to sustainability.  
[www.iema.net](http://www.iema.net)