

Local Net Zero Delivery Progress Report

Waste

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July 2022



About UK100

UK100 is a network of local authorities that have pledged to shift their communities to Net Zero ahead of the government's legal target. They do this to demonstrate their ambition, make the case for rapid change, and enable a fast and fair transition.

The network provides local leaders opportunities to learn from each other, agree priorities for legislative and regulatory change, engage with national decision-makers and businesses, and develop a better understanding of how to build consent and support for rapid climate action in their communities.



Executive Summary



The power and potential of local authorities (LAs) to design and deliver real progress towards Net Zero against a global backdrop of unpredictable and far-reaching challenges has never been clearer.

This report presents an analysis of the progress made towards delivering Net Zero waste at a local level in the UK in the past year, and our recommendations for actions needed to enable the pace and scale of delivery required for success.

In May 2021, UK100 produced Power Shift,¹ an in-depth assessment of the powers both held by and needed for LAs to deliver Net Zero. The report outlined the challenges and barriers to progress. Alongside insights from the Climate Change Committee (CCC)² and the National Audit Office (NAO),³ our report emphasised the crucial role LAs have in meeting the Government's climate targets.

Similarly, our Rural Net Zero⁴ report delivered key insights on the challenges in the UK rural context. All of this research and insight will feed into this report.

¹ https://www.uk100.org/sites/default/files/publications/Power_Shift.pdf

² <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

³ <https://www.nao.org.uk/report/local-government-and-net-zero-in-england/>

⁴ https://www.uk100.org/sites/default/files/publications/Rural%20Net%20Zero_May%202021.pdf

Global challenges with local consequences

Following the release of the Net Zero Strategy in October 2021 and the introduction of the Environment Act in November 2021, 2022 was set to be a year of delivery. However, progress has been slow, partly because the emerging cost of living crisis has drawn attention away from long term challenges. But higher prices and energy demand can and must be tackled in parallel with reaching Net Zero, and local delivery at pace and scale is key.

Local authorities can lead the way

Many ambitious LAs have set Net Zero targets that are ahead of the UK Government's 2050 deadline. The 102 (correct at time of writing) LAs that have signed UK100's members pledge have committed "to lead the UK's response to climate change, acting sooner than the government's goal by making substantial progress within the next decade to deliver Net Zero."

Through innovative partnerships and by identifying and scaling successful pilot projects, they are focusing on sectors that urgently need decarbonising - including waste and recycling. Giving more LAs the power to set similar trajectories and build momentum for change will be key to delivering a Net Zero future.

The issues raised in this report both influence and are influenced by cross-cutting issues. This report is one of eight sector-based reports produced to assess progress on Local Net Zero Delivery. There are lots of commonalities and synergies between them which are clearly signposted throughout each of the reports.⁵

⁵ <https://www.uk100.org/publications/local-net-zero-progress-reports>



What's in this report?

The research, summarised in this report, aims to:

- 1** Assess the progress on delivery of Government commitments
- 2** Take stock of UK100's research recommendations and identify areas where key developments have taken place and highlight where barriers remain
- 3** Share success stories from LAs.



Context

Local and combined authorities are already leading in many aspects of the Net Zero agenda, but they could go so much further and faster if given the scope to do so.

Waste is responsible for 6% of emissions (2020) and reduction of the sector's emissions have generally stagnated. The CCC states that to be on track for Net Zero, sending biodegradable waste to landfill must stop by 2030 or earlier and that municipal recycling rates should increase from around 45% in England to 65% by 2025 and 70% by 2030.⁶ In its June 2022 progress report to Parliament, the CCC highlighted waste management as one of the areas where strategies and detailed plans for decarbonisation are still needed.⁷

UK100 has made clear recommendations for faster and more scalable progress towards a Net Zero future. In our 2021 Power Shift report,⁸ we outlined how LAs have an important role in the decarbonisation of our waste. It noted that whilst LAs have duties around waste collection and disposal, they have very little control of how much is generated in the first place, or how well it is segregated at source. The following issues were identified in the report in relation to tackling the waste sector's contribution to Net Zero:

- LAs have no power to enforce recycling or separating food waste by householders. They have to rely on persuasion, marketing and provision of good collection services
- They cannot charge for residual waste to incentivise improved levels of recycling
- Poor quality recycling results in contaminated materials streams which can be rejected by materials recycling facilities with knock on effects for LAs
- Multiple streams of different materials used by producers makes it harder to provide a recycling service and confusing for the householders

⁶ <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

⁷ <https://www.theccc.org.uk/wp-content/uploads/2022/06/Progress-in-reducing-emissions-2022-Report-to-Parliament.pdf>

⁸ https://www.uk100.org/sites/default/files/publications/Power_Shift.pdf

- Recycling in urban areas is relatively low, at around 45% due to houses of multiple occupation, flats and student accommodation. Recycling services in sparser rural areas are difficult for district councils to provide because of the large distances for collection teams to travel
- District councils are not rewarded for raising recycling rates because recycling credits go to the Waste Disposal Authority.

Our Rural Net Zero report highlighted that rural areas are also disproportionately affected with total emissions from large industrial installations over four times as much as in the most urban areas.⁹ Moreover, the most highly polluting and energy intensive industries tend to be located in rural areas including waste management, although industry is not recognised as a rural issue in policy.

The main waste recommendation made in our Power Shift report is:¹⁰

“ **Alongside new initiatives such as EPR (Extended Producer Responsibility) and DRS (Deposit Return Scheme), LAs need powers to reduce residual and commercial waste, as locally appropriate, across all waste streams, to meet Net Zero.** ”

To support this, LAs will need enabling powers including the power to pilot **charging for residual waste** as part of a wider behaviour change campaign, and the power to **intervene in the commercial waste market** in line with Net Zero ambitions.

Key supporting policies, frameworks and resources from national government to underpin this include:

- extending work on producer responsibility and circular economy to reduce waste at source
- increasing resources to support individual and corporate behaviour change on waste reduction and recycling.

⁹ https://www.uk100.org/sites/default/files/publications/Rural%20Net%20Zero_May%202021.pdf

¹⁰ https://www.uk100.org/sites/default/files/publications/Power_Shift.pdf



Progress

This section of the report offers us an opportunity to take stock of the past 12 months and highlight the main areas where developments have taken place. A more thorough analysis of what these developments mean is provided later in the report.

What's happened?

- October 2021**
 - The Government published its Net Zero Strategy¹¹
 - The Government restricted the supply of single-use plastic straws and stirrers, and plastic-stemmed cotton buds¹²
- November 2021**
 - Environment Act enshrined in law¹³
- April 2022**
 - The Government implemented a tax on plastic packaging not containing at least 30% recycled plastic¹⁴
- May 2022**
 - Defra consulted on a proposed target of reducing residual waste per capita by 50% by 2042¹⁵
- June 2022**
 - The Government issued updated guidance to businesses to prepare them for the new legislation on packaging waste and EPR.¹⁶

There have been some positive indicators of progress in line with our recommendations over the last 12 months.

11 <https://www.gov.uk/government/publications/net-zero-strategy>

12 <https://www.gov.uk/government/consultations/single-use-plastic-banning-the-distribution-and-or-sale-of-plastic-straws-stirrers-and-plastic-stemmed-cotton-buds-in-england>

13 <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

14 <https://www.gov.uk/government/publications/introduction-of-plastic-packaging-tax-from-april-2022/introduction-of-plastic-packaging-tax-2021>

15 <https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/>

16 <https://www.gov.uk/guidance/packaging-waste-prepare-for-extended-producer-responsibility>



The Government's Net Zero Strategy states that: "As part of reforms to the resources and waste system, we also will move towards a circular economy, improve resource efficiency, and achieve near elimination of biodegradable waste to landfill."¹⁷ And sets a clear direction of travel on tackling landfill waste: "To support our commitment to explore options for the near elimination of biodegradable municipal waste to landfill from 2028, we are bringing forward £295m of capital funding which will allow local authorities in England to prepare to implement free separate food waste collections for all households from 2025."

The Environment Act November 2021 specifies that the Defra Secretary of State must set a long term target within four priority areas, one of which is waste reduction. The Secretary of State has to report on whether the targets have been met, and, if not, why.

¹⁷ <https://www.gov.uk/government/publications/net-zero-strategy>



Specifically with regard to waste reduction and resource efficiency, the Act says:

- Related to Consistency in Household and Business Recycling - in English waste collection authorities, recyclable household waste must be collected separately from other household waste for recycling or composting, and each recyclable waste stream should be collected separately. Food waste must be collected once a week
- The relevant national authority (in England, Wales, Scotland and Northern Ireland) can make regulations to enforce producer responsibility obligation with regard to waste reduction and recycling of materials. This can include targets for recycling and payments to be made in lieu of reduction
- Charges may be introduced for the disposal costs of certain products or materials, where "disposal" includes re-use, redistribution, recovery or recycling. These charges would be payable by those involved in the manufacturing, processing, distributing or supplying these products or materials and enforced by law
- Producers could also be obliged to provide information about the resource efficiency of their products, including the expected life of the product, its repairability, and whether it can be recycled at the end of its life. Information would also be provided about the materials used in manufacture, resources consumed, and pollutants emitted at any stage of the product's manufacture or use
- Regulations can be brought in to require certain products to meet specified resource efficiency, and these would be enforced. This could include banning products that don't meet the standards set
- Other regulations could establish and enforce deposit return systems to aid recycling and reduce littering and fly-tipping, or to introduce charges for single-use items to discourage their use.

It also establishes the Office for Environmental Protection (OEP) to monitor and enforce environmental law, which is independent of the Secretary of State. The OEP must keep tabs on its progress in improving the natural environment in accordance with the current environmental improvement plan, and make an annual progress report.¹⁸

¹⁸ <https://bills.parliament.uk/bills/2593>



Highlights:

What's going well

- The Government has issued updated guidance to businesses to prepare them for the new legislation on packaging waste and EPR coming into effect from January 2023¹⁹
- The Government has restricted the supply of single-use plastic straws and stirrers, and plastic-stemmed cotton buds, and implemented a tax on plastic packaging not containing at least 30% recycled plastic.

¹⁹ <https://www.gov.uk/guidance/packaging-waste-prepare-for-extended-producer-responsibility>



Opportunities:

What we'd like to see more of/what has potential

In line with the Environment Act, Defra has consulted on a target for reducing residual waste. Whilst keeping to the requirements and timeframe of the Environment Act is positive, how this target reduction will be achieved isn't clear - does it imply more energy from waste, or more recycling and promotion of a more circular economy? The CCC say total waste arisings should be reduced by up to 33% by 2037 from baseline projections, through improved product design, light-weighting and standards, asset sharing and repair, DRS and EPR²⁰ - how the Government envisages reaching its target is not clear. These are important details for the Government to clarify in its response to the consultation.

Generally Defra's consultations are moving the policy area forward, but as noted by the CCC in its 2022 report to Parliament detailed strategies need to follow. And a mixture of enablers are required to deliver on the targets set effectively. The Government should bear in mind that the Resources and Waste Targets Expert Group noted, in its meeting of 3 December 2021:²¹

“ Any further policy pathway should include appropriate pull factors as well as push factors, e.g. investment in sorting and reprocessing infrastructure. [The UK Government] should be using the most appropriate levers to drive change across the system, including some elements of waste prevention and some of recycling.”²²

Finally, more clarity is needed on what the OEP's role will be in managing progress in waste management and EPR. Clarity on both this and also how it will tie into progress on Net Zero are urgently needed.

²⁰ <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

²¹ <https://consult.defra.gov.uk/waste-and-recycling/consistency-in-household-and-business-recycling/>

²² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073160/rwteg-minutes-211203.pdf

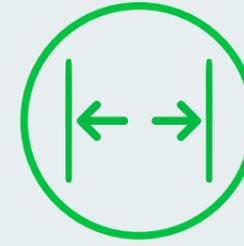


Challenges:

What could be going better

- Whilst it is good to see legislation on DRS and EPR in the Environment Act 2021, there has been little progress. The CCC 2022 report highlighted that there is a risk in delaying the provision of detailed plans on these issues
- We are still awaiting Defra's response to its consultation on consistency in waste collection and recycling, which ran from May to July in 2021
- With regard to the latter point, Defra is expecting to publish the government response soon, and is consulting on statutory guidance in Summer 2022.²³

²³ <https://www.letsrecycle.com/news/defra-remains-tight-lipped-on-consistency-response/>



Gaps:

What's missing?

- Despite the movement on waste reduction, there is a lack of common guidance and provision nationally to make things easier for LAs, which still find themselves with a level of responsibility that is not matched by their powers
- When the Government revealed its plans for implementing EPR for packaging, the cost to producers fell by £1bn due to the exclusion of business waste. With producers no longer liable for the costs of collecting from businesses, there is a need to ensure businesses are fully engaged to meet the targets. Behaviour change for industry and householders alike is incredibly important. But behaviour change, as well as litter in the broader environment, are not addressed in the Government's current plans and this is a huge gap. LAs have a great opportunity to influence behaviour change and should be empowered to maximise this
- Flats and flats above commercial premises represent a very different subset with their own challenges - they need particular attention if consistent collections are to be delivered
- And so, there are no real plans for cohesive local collection or addressing any of the issues outlined in Power Shift, for example enabling powers to charge for residual waste or to intervene in the commercial waste market, without which the Government's target (whatever it is) will be hard to achieve.



Overarching Themes

We have identified three overarching themes which apply across all the progress reports in this series. By identifying blockers and sharing successes in these key areas, we can achieve the step-change we need.

Partnerships

Various industry initiatives and sectors are undertaking voluntary measures to design out or reduce waste, and move towards a circular economy, in the absence of a clear strategic direction provided by the Government. These include the UK Plastics Pact, Electrical and Electronic Equipment Sustainability Action Plan and Sustainable Clothing Action Plan.²⁴

But now action needs to move from being voluntary to mandatory. The reforms brought about by the Environment Act need to be swiftly enacted.

²⁴ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Waste.pdf>;
<https://wrap.org.uk/taking-action/plastic-packaging/initiatives/the-uk-plastics-pact>;
<https://wrap.org.uk/resources/guide/electricals/electrical-electronic-sustainability-action-plan>;
<https://wrap.org.uk/taking-action/textiles/initiatives/scap-2020>

Finance

The OECD's Environmental Performance Reviews have shown that government support through grants, loans, tax exemptions and other mechanisms are a key part of the overall policy mix for waste management.²⁵ Financial mechanisms need to be sought in the move to a circular economy.

Capital funding is positive, with more than £400 million to be provided over two years to “implement free, separate food waste collections in every English local authority from 2025, supporting the near elimination of biodegradable municipal waste to landfill by 2028.” However, it is unclear how it will be allocated and it is unclear whether this is an adequate amount to support roll out to the whole country. There is also a question of how to address the point for LAs who have already invested in food waste collections, compared to those that are waiting for funding. Reading (see below) and 24 London Boroughs already have a service in place that has not had access to Government support. Creating a fair and level playing field is important.

WRAP has advocated that there is a strong business case for weekly food waste collections from households and businesses.²⁶ It is important that all LAs are funded to help implement these and other requirements laid out in the Environment Act, whether through finance raised by the proposed EPR scheme for packaging or otherwise. We need clarity and a timeframe on what, when and how it will be funded.

²⁵ https://www.oecd-ilibrary.org/environment/oecd-environmental-performance-reviews_19900090
²⁶ <https://wrap.org.uk/taking-action/collections-recycling/delivering-for-government/resources-waste-strategy-england>



Member Insight:

Reading

Reading Borough Council introduced a weekly residential food waste collection service in February 2021, with a pilot scheme having started the previous October.²⁷ The introduction of food waste collections led to an increase in the council's recycling rate from 32% in April 2020 to 52% in April 2021, exceeding the project target of 44% and the Council's wider target of 50% recycling by 2020.

By diverting waste from landfill the new service has significantly reduced methane emissions - WRAP has calculated that on average four tonnes of CO₂e are avoided for every tonne of food waste prevented. The forecast figure for the year to March 2022 is for 7,606 tonnes of food to be diverted from landfill to an anaerobic digester which generates electricity and agricultural fertiliser. This equates to a net reduction of some 4,700 tonnes CO₂e. As well as the environmental benefits, the new service brought cash savings to the council of £107,000 a year.

²⁷ <https://www.getreading.co.uk/news/reading-berkshire-news/reading-food-waste-collection-bins-19010692>



Frameworks and Governance

WRAP has been advocating for all LAs to collect a consistent range of materials to a minimum service standard - there needs to be a clear framework to make this possible. This will play an important role in reducing confusion for householders, enabling clearer labels on packaging, increasing recycling rates and improving material quality, especially when put alongside the proposals for mandatory weekly food waste collections.

We need clarity on how - or even if - the OEP will manage consistent collection, as well as how the 'Technically, Environmentally and Economically Practicable (TEEP) requirement will be interpreted.²⁸

Additionally, how will these developments integrate with the wider Net Zero target more generally? According to the CCC, a sector plan for Net Zero is required which puts in place the right incentives and regulations to enable decarbonisation.²⁹

²⁸ [From 1 January 2015, the Waste Regulations \(England and Wales\) 2012 applied a requirement for any 'establishment or undertaking' that collects waste to separately collect paper/card, plastic, glass and metals where separate collection is necessary to ensure that the waste undergoes treatment for recovery or recycling and where 'Technically, Environmentally and Economically Practicable' \(TEEP\)](#)

²⁹ <https://www.theccc.org.uk/wp-content/uploads/2022/06/Progress-in-reducing-emissions-2022-Report-to-Parliament.pdf>



Devolved administrations

Scotland

Consultations on both Scotland's Circular Economy Bill and a Route Map to 2025 were published on 30th May 2022 to help steer the course for achieving Scotland's waste and recycling targets.

Scotland's DRS³⁰ will go live in August 2023. The previous go-live date was July 2022, but was delayed as a result of the COVID-19 pandemic.

DRS infrastructure, such as reverse vending machines, will start rolling out from Summer 2022 and, where possible, the Scottish Government will work with retailers to enable use of this infrastructure on a voluntary basis from November 2022. The target of achieving 90% collection rates by 2025 will be maintained. It is still on course to be the first DRS to be implemented in the UK.

Wales

The Welsh Government had announced a ban on the use of more commonly littered, single-use plastics, like straws and cotton buds, to begin in 2021. As of June 2022, the ban has still not been implemented, as a result of the UK Internal Market Act, which prevents restriction on movement of goods around the UK. Effectively, while the Senedd could vote to ban the manufacture of single-use plastics, it currently cannot prevent the use of those items in Wales.

³⁰ <https://depositreturnscheme.zerowastescotland.org.uk/>

A similar ban in Scotland is expected to be given an "exclusion" by Westminster under the Internal Market Act, and the same is likely to be granted to Wales, although the Welsh Government has raised concerns about the scope of what UK ministers have planned.

“ The Welsh Government has pledged to become a zero waste nation by 2050. That will mean that virtually no materials are buried or burned and we have effectively 100% reuse and recycling. By 2025, greenhouse gas emissions from landfill sites will reduce by 19%, compared to 2019.³¹ ”

³¹ https://issuu.com/businessnewswales/docs/green_industries_wales_issue_1





Analysis

Despite the Environment Act of 2021 moving waste management forward, and the Net Zero Strategy providing funding for LAs to address food waste, there are significant gaps that need addressing. EPR and DRS have a lot of potential to improve the impact of the waste sector, but developments are taking too long.

LAs remain responsible for waste collection and disposal, but the financial benefits of recycling do not accrue to those authorities. Nor do they have significant control over how much waste is generated in the first place. The powers that UK100 has advocated for, including the power to pilot charging for residual waste as a way of changing personal and corporate behaviour, and the power to intervene in the commercial waste market in line with Net Zero ambitions are not forthcoming.

The Environment Act does promote more recycling collection, including moves towards food and green waste to be collected separately from other recyclable waste. But further guidance is awaited.

At this stage, we await a clear strategy on waste reduction, and clarity on how this is linked with the provisions of the Environment Act, and the way forward on Net Zero. All in all, we can see there has been some progress in the effort to reduce and decarbonise waste, but not enough, details are lacking, and this progress is too slow.



Recommendations

In conclusion, our key recommendations are as follows:

- There should be urgent progress on EPR and DRS
- A framework should be implemented for more cohesive national collection and behaviour change to promote a circular economy. Clarity on the role of the OEP in managing progress against waste targets is needed too
- Clearer links need to be made between the Net Zero agenda and improvements in waste reduction.





Glossary of terms

| | |
|-------|---|
| CCC | Climate Change Committee |
| Defra | Department for Environment, Food and Rural Affairs |
| DRS | Deposit Return Scheme |
| EPR | Extended Producer Responsibility |
| LA | Local authority |
| NAO | National Audit Office |
| OECD | Office for Economic Co-operation and Development |
| OEP | Office for Environmental Protection |
| TEEP | Technically, Environmentally and Economically Practicable |
| WRAP | Waste and Resources Action Program |





Acknowledgements

We would like to thank all the UK100 members that contributed updates in the development of the progress reports. Particular thanks go to Zoe Roberts, Harriet Wadsworth and Pete Nolan from the UK100 team, to the team at Quantum Strategy and Technology, Antony Buchan at ReLondon and Gary Bainbridge.



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