



WASTE PREVENTION PROGRAMME FOR ENGLAND: TOWARDS A RESOURCE EFFICIENT ECONOMY

Draft Response to Consultation Questions 25 May 2021

Question 1. Would you like your response to be confidential

No

Question 2. What is your name?

Beckie Bennett, Head of Waste and Environment

Question 3. What is your email address? beckie.bennett@ryedale.gov.uk

Question 4. Are you responding:

- As an individual
- As an academic
- On behalf of an organisation

About your organisation

Question 5. What type of organisation are you responding on behalf of?

- A government body
- Non-governmental organisation
- Local authority
- Charity
- Consultancy
- Small or micro business (Less than 50 employees)
- Medium business (50 – 249 employees)
- Large business (250 or more employees)
- Industry association
- Responding on behalf of another type of organisation

Question 6. What sector is your organisation primarily active in?

Waste and Recycling Collections and Street Cleaning Services

For businesses, please provide your 5-digit SIC code, if available
(<http://resources.companieshouse.gov.uk/sic/>)

Question 7. Please provide your organisation's name

Ryedale District Council



Consultation questions

Please answer as many questions as you wish. If you choose not to answer a particular question, for example because you do not have knowledge or interest in that area, mark the question as 'Not answered'. For questions that are not answered, no explanation is required.

Chapter 1: Introduction

Refer to pages 1-13 in the draft Waste Prevention Programme

Question 8: Do you agree or disagree with our choice of impacts and outcomes as the right goals for us to be aiming to achieve?

- a. Strongly agree
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

If you disagree, please briefly explain why.

Question 9: Do you agree or disagree that our policy approach covers all the areas for action that are needed?

- a. Strongly agree
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

d. Disagree

- e. Strongly disagree
- f. Not answered

If you disagree, please explain what you think is missing.

Whilst we welcome the policy for waste prevention much more is needed to tackle waste minimisation and resource efficiency to change consumer behaviour, protect biodiversity and reduce resource use with a clear vision and plan.

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Refer to pages 14-18 in the draft Waste Prevention Programme

Question 10: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree



b. Agree

c. Neither agree nor disagreed.

d. Disagree

e. Strongly disagree

f. Not answered

Please provide details / explain your answer

Better product design for more durable, repairable and recyclable products on the market will achieve some of the aims, however if cheaper single use products are still available then this needs addressing. Labelling products with their environmental credentials may help however consumer's finances may dictate their decision making.

Chapter 3: Reuse, Repair, Refill, Remanufacture: local services and facilities

Refer to pages 19-22 in the draft Waste Prevention Programme

Question 11: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

a. Strongly agree

b. Agree

c. Neither agree nor disagree

d. Disagree

e. Strongly disagree

f. Not answered

Please provide details / explain your answer

The lack of storage space is a key factor in preventing further reuse at the household waste recycling centres (HWRCs) in North Yorkshire. Most of the HWRCs in North Yorkshire are too small to include a Reuse shop, WEEE reuse container or any other further items. If waste prevention is included in any site allocation plans for new sites this would be welcomed but it does not help with the current facilities. An information note for local authorities that do not have the space to develop on site facilities would be welcomed to develop partnerships with social enterprises off site. There may also be an income loss to the council if working with social enterprises rather than businesses.

EPR for furniture is essential to capturing these items at the earliest opportunity, prior to being transported and damaged in the back of a car to a HWRC.

Chapter 4: Data and Information: from industrial symbiosis to research & innovation

Refer to pages 23-27 in the draft Waste Prevention Programme

Question 12: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?



- a. Strongly agree
- b. **Agree**
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

Chapter 5: Construction

Refer to pages 28-31 in the draft Waste Prevention Programme

Question 13: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree
- b. **Agree**
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

Chapter 6: Textiles

Refer to pages 32-36 in the draft Waste Prevention Programme

Question 14: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. **Strongly agree**
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer



We agree that textiles that are made to last and are easy to reuse, repair and recycle will improve outcomes. Improved eco labelling will help some consumers behaviour change but financial considerations will be more important to some consumers.

EPR would be welcomed to increase the reuse and recycling of textiles through collection services including a landfill/incineration ban. This will impact local authority collection schemes and there will be an extra financial burden for collecting textiles as they aren't currently collected at the kerbside but we would expect this to be covered through the EPR scheme.

We are unsure that the new voluntary agreement for 2021-2030, Textiles 2030, will have the desired impact and believe the agreement and commitments need to be statutory requirements rather than voluntary.

Chapter 7: Furniture

Refer to pages 37-40 in the draft Waste Prevention Programme

Question 15: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree
- b. Agree**
- c. Neither agree nor disagreed.
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

Best practice is to be encouraged through industry and minimum standards on durability, reparability and recyclability. We would welcome an EPR for bulky waste. Collection of bulky waste – (often furniture) is offered by local councils, but items are usually collected from outside homes and then stored externally and therefore not suitable for reuse/repair. Some items are collected in a refuse wagon so are immediately disposed of or an open caged vehicle also subject to the weather. The HWRCs have limited space for furniture reuse (one container per site for all reuse in North Yorkshire). EPR for furniture is essential to capturing these items at the earliest opportunity, prior to being transported and damaged in the back of a car to a HWRC. Take back schemes from consumer homes would be the preferred method to keep the item in the best possible condition prior to reuse/repair. Some social enterprises/charities do offer this service but residents can be worried that the item won't have the correct fire labels/be in good enough condition etc.

Chapter 8: Electrical and Electronic Products

Refer to pages 41-45 in the draft Waste Prevention Programme

Question 16: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree



b. Agree

c. Neither agree nor disagree

d. Disagree

e. Strongly disagree

f. Not answered

Please provide details / explain your answer

We welcome the review of the WEEE Regulations especially around Policies aimed at encouraging more reuse of EEE. Regulations need to include modulation of reuse evidence to give it a higher weighting than recycling evidence.

Defra's new strategy for Government estate procurement of electronic equipment sets out a range of ambitions and targets in respect of digital services and information, and communications equipment, this strategy needs to cover all businesses above a de minimus level.

We welcome the review of better eco-design of EEE. The barriers of reuse at HWRCs include space requirements at small sites (small WEEE currently stored in cages outside). Mandatory kerbside collections are welcomed but it is not clear whether this is through the retailer or local authorities. If it is through local authorities then there will be a significant cost burden to councils which would need to be covered by EPR

Chapter 9: Road Vehicles

Refer to pages 46-51 in the draft Waste Prevention Programme

Question 17: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

a. Strongly agree

b. Agree

c. Neither agree nor disagree

d. Disagree

e. Strongly disagree

f. Not answered

Please provide details / explain your answer

Chapter 10: Packaging, Plastics and Single-use Items

Refer to pages 52-55 in the draft Waste Prevention Programme

18: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

a. Strongly agree

b. Agree



- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

Charges on single use plastics are welcomed along with restrictions of supply of single use items. The EPR system for packaging will help to some extent and will encourage better packaging design and recycling and it is essential that reuse is encouraged together with recycling.

Chapter 11: Food

Refer to pages 56-60 in the draft Waste Prevention Programme

Question 19: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree
- b. Agree
- c. Neither agree nor disagree
- d. Disagree**
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

Behaviour change is not easy however measures to tackle this are key to reducing food waste rather than allowing it to continue by introducing weekly food waste collections this does not deter people throwing away food.

The aim does not fully consider the environmental damage of producing food including its transportation.

Using a form of EPR a Modulated tax/fee would help consumers appreciate this issue and significantly reduce food waste.

Chapter 12: Monitoring and Evaluation

Refer to pages 61-66 in the draft Waste Prevention Programme

Question 20: Do you agree or disagree with the described approach to monitoring and evaluation of this Waste Prevention Programme?

- a. Strongly agree
- b. Agree**
- c. Neither agree nor disagree
- d. Disagree



e. Strongly disagree

f. Not answered

Please provide details/explain your answer

The local authority key indicators of reducing waste arisings and reducing tonnages of residual waste appear to be the simplest measurement at this time but further metrics would be welcomed.

DRAFT