

Appendix 1

Consultation on Waste Prevention Programme for England

NFDC response – June 2021

Please note, not all questions are relevant to local authorities, and only the questions to which NFDC will be responding are included here.

Some questions need to be read alongside the consultation document, found here:

[Consultation on the Waste Prevention Programme for England: Towards a Resource-Efficient Economy - Defra - Citizen Space](#)

About your organisation

6. What sector is your organisation primarily active in?

New Forest District Council (NFDC) is a Waste Collection Authority, serving and collecting waste and recycling from 80,000 households every week. NFDC work alongside our partners in the Project Integra (PI) partnership including Hampshire County Council (our Waste Disposal Authority) to encourage waste prevention initiatives and raise awareness of the environmental benefits of waste minimisation. As such, our response is supportive of the views of PI.

Chapter 1: Introduction

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

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.

We strongly support the focus on waste prevention and wanting to move waste management back up the waste hierarchy. We agree with the aims of a substantial reduction in avoidable waste, lower greenhouse gas emissions, reduced harm to nature, and greater resource security.

However, while we agree, we feel that the outcomes are missing a key point which is reduction of consumption of goods in the first place. Eco-design, consumers making informed choices, and accessible reuse and repair services can only go so far, and the culture of fast fashion, or a new mobile phone contract with the latest model every year needs to be changed. With the exception of garden waste, most waste is generated by things that have been bought, so it goes without saying that less consumption will

lead to less waste. This would lead to a reduction in residual waste which would lower local authority costs, freeing up budgets to implement more resources on further waste prevention and engaging with residents. NFDC is keen to reduce residual waste from the current 464kg per household per year but would require a greater level of resource in order to do so. Even if items that are bought are reused afterwards, consumers buying items that will last longer and are not a 'fad' will mean less production in the first place which will really help lower greenhouse gas emissions.

Additionally, consumers making the right decisions needs to be affordable for all. There are those currently that may wish to buy more sustainable 'eco' items, however currently these tend to be more expensive and so many on lower incomes simply cannot afford to make the right choices. ([Quarter of Britons say shopping green is too expensive | The Independent](#))

We also agree with making reuse and repair services more accessible. The more accessible and convenient it is to access reuse and repair services, the more residents will use them. The incentives to use these services need to outweigh the ease of ordering something new. Resale sites at HWRCs make cheaper items accessible but those that don't have a car can't access them.

If everyone on earth consumed as we do in the UK, by May 19th 2021 we will have reached Earth Overshoot day ([Country Overshoot Days 2020 - Earth Overshoot Day](#)), defined as the date when humanity's demand for ecological resources and services in a given year exceeds what Earth can regenerate in that year. Education is urgently required to teach people how to make the most of what they have already, and change attitudes so that buying less, keeping things for longer, buying second hand and reuse become the 'norm' not behaviour reserved for those that are restricted by income, or understand how their choices effect the environment.

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

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

Although we support the policy approach areas outlined in the consultation, we would also like to see support for those that are already working on the ground in waste prevention, for example third sector organisations and reuse charities which have struggled during the covid-19 pandemic. There is already a network of repair cafes, men's sheds, upcycled furniture businesses that need more help to reach more of the community and expand.

Rather than consumer information, we'd like to see more proactive resident engagement and behaviour change to help consumers understand why waste prevention is so important and how what we all consume can make a big difference. Those that are already conscious consumers or would be more inclined to buy a product due to eco-credentials on the label, tend to already understand the implications of what they consume and how it links to climate change. However, there are others who may not see the link between climate change and their buying choices, and information alone is unlikely to change their behaviour. Therefore, updated labelling with specific communications looking at behaviour change will have more of an effect than labelling alone.

We also wish to see companies being transparent about their eco principles, to avoid residents inadvertently making a bad choice because a company is perceived to be producing sustainable goods when they are not.

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

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

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?

Aim: to drive change in product design so that products are made to be durable, repairable, and recyclable, and can be remanufactured where appropriate.

- 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 support the Government in looking to set design requirements for products, products that are more durable, repairable, and recyclable, as well as these goods having a lower environmental impact, they will provide better value for money for consumers. However, we would like to see more detail as to how this will apply to companies outside of the UK whose goods are imported here, especially given that a large contributor to the UK's carbon footprint is from consumption of products that are made abroad ([Half UK's true carbon footprint created abroad, research finds | Green politics | The Guardian](#)). We also have concern over the point 'we will also encourage industry to set their own standards to reduce the need for regulation'. This means that any standards set are not independent, cannot be monitored independently, and may not be sufficiently ambitious. Additionally, it's not clear if industry would have to agree on a set standard or they can be different, if it's the latter there won't be any uniformity. A lack of uniformity would make it difficult to measure which companies are making real progress and which are underperforming.

We would also like more information as to whether brands and producers will be encouraged to change all of their products to be more durable, repairable and recyclable etc, or whether they will be able to offer 'eco ranges' with people still able to buy products that do not fit these criteria. We would prefer that the only products on offer meet the durable, repairable, recyclable criteria, but recognise if these come at a higher price point it may make purchasing difficult for some lower income families so there is a balance to be met.

With regards to the energy-related products policy framework, we would like to see more information on how this will be enforced to ensure companies are adhering to it.

We agree with the proposal to support consumers with information so they can make informed choices when purchasing. However, there are already a large number of labels on products (especially on food) and additional labelling might cause further confusion as to what is best to buy, and 'product attributes such as price, brand, quantity, use-by-date and nutrition information compete with eco-labels for consumer awareness' ([Sustainability labels on food products: Consumer motivation, understanding and use - ScienceDirect](#)) which shows that labelling only goes so far, but is not enough to sway consumers buying choices. For this reason, we believe that labelling will only make some change, and a consumer behaviour change initiative is also required. Additionally, as mentioned previously, those that are already environmentally minded will look for sustainability credentials which informs their buying choices and would likely be more receptive to labelling giving further information, but 25% of the population do not believe, or are unsure that climate change is happening due to human activity ([Belief in climate change \(yougov.co.uk\)](#)). If those 25% do not link climate change to human activity, it is unlikely that they will link their behaviour and products they

consume to making a difference to the environment, in which case, labelling may not do anything to change their mind.

With regards to EPR, we have responded to this separately in the EPR consultation.

In summary, we agree with the actions detailed in the consultation, however, feel they need to be expanded and strengthened, and more details considered.

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

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

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?

Aim: to ensure there is a well-functioning system of public, private and third sector organisations and services operating at the local level that facilitate reuse, repair, refill and remanufacture of products.

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

Please provide details / explain your answer.

With regards to the information note developed for Local Authorities, whilst we agree that it is good to showcase best practice, and as a partnership we are always interested to see what other authorities are doing to improve their services, an information note does not help overcome the challenges with regards to moving waste up the hierarchy and supporting waste prevention at the grassroots level.

From a waste collection authority point of view, waste services have been running through many years of austerity. Charged bulky waste collections (along with garden waste) are one of the few areas where collection authorities can charge, and the service pays for itself. Bulky waste collections enable a quick and easy way for residents to dispose of items which perhaps they are unable to take to a HWRC, either due to transport issues, or the inability to move the item in and out of car. There are many problems however; residents need to leave items outside prior to collection, and this can reduce the quality of the item especially on wet days, covered vehicles are required to keep the items in good condition, staff need to be trained to recognise what items are suitable for reuse and incentivised to maximise reuse. For Local Authorities to send collected items of bulky waste for reuse, it requires storage space to keep the items until they can be collected by a charity/reuse organisation who provide the outlet for the material. Some items may not be required by the charity/organisation at that time, meaning they will take up space in storage. To attempt to solve these issues requires resources and funding for collection authorities and other stakeholders.

The focus for Government reporting on waste and recycling has always been on recycling rates as a marker of performance, and this does not give waste collection authorities the incentive to focus on waste prevention.

Our Waste Disposal Authority, Hampshire County Council, see waste prevention as pertinent, as reductions in waste have an impact on waste disposal costs. Hampshire County Council have a waste prevention team which run communications, behaviour change programmes, and take part in events to educate and inform the public on ways they can prevent waste at home. However, most WCAs do not have

dedicated waste prevention teams or resources to effectively support this. It requires a more joined up approach from all aspects of the waste management chain to really make progress in waste prevention. This means that additional resource within WDA and WCA waste and recycling teams is needed if dealing specifically with waste prevention.

Given all of the issues listed above, although an information note might provide case studies and ideas for improved ways of working, without additional resources it will be difficult for local authorities to implement big changes or initiatives to work with residents on waste prevention.

We would be interested to see more information with regards to the “circular economy hubs” and how they might work. Hampshire now has a network of zero waste shops, repair cafes, men’s sheds (which undertake repair work) and reuse initiatives, and the possibility to expand on this to develop the Circular Economy in Hampshire would be welcomed. We would welcome further support to local authorities to ensure that more materials and products can be reused or recycled locally, further minimising the environmental impact of these processes.

Finally, we support the proposal to enhance the quality of data by providing voluntary guidance to local authorities on how to fulfil current reporting requirements, this will give a better understanding of how much reuse activities are taking place. Additionally, an issue that needs to be addressed to enable accurate reporting is that it is difficult to quantify tonnage at the point of which the material becomes or is passed on for reuse as this would require a member of the public or charity to go over a weighbridge.

As a general point, given the compelling points for waste prevention listed at the start of the consultation, including reduction of greenhouse gas emissions, creation of jobs and benefit to the economy, we do not feel the actions proposed are robust enough to match up with the importance of moving waste up the hierarchy as you have outlined. Actions like ‘explore’ and ‘encourage’ and tasks such as developing case studies, information notes and voluntary guidance do not show a huge commitment in this area to make the real change that is needed.

Chapter 6: Textiles

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

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?

Aim: to address the negative environmental impacts of the textiles sector and fast fashion, including by supporting more sustainable design, improved consumer information, new business models and better recycling.

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

Please provide details / explain your answer.

With regards to action point 3, improved labelling is welcomed but will only go so far and doesn’t tackle the overall problem of “fast fashion” whereby certain consumers feel they need new clothes all the time to keep up with the latest trends.

It is stated that Government will address new business models, however there is no discussion in the list of actions about reducing the amount of clothes produced in the first place.

We think that moving towards closed loop recycling for textiles is what the government should be aiming for, as highlighted in this article (<https://www.bbc.com/future/article/20200710-why-clothes-are-so-hard-to-recycle#:~:text=Globally%20just%2012%25%20of%20the, clothing%20ends%20up%20being%20recycled&text=13.6%25%20of%20clothes%20and%20shoes, clothing%20ends%20up%20being%20recycled>) but given all the different materials that clothing is made from, it is not that simple to recycle. We would like to see the government looking closely at the increased practice of mixing materials, specifically plastics in textile products, which makes the recycling process more difficult and more costly. There seems little point putting in improved collection and recycling infrastructure if the material is then of insufficient quality to reprocess.

This feeds into action 4 to enable better textiles collections, local authorities in Hampshire currently collect textiles through textile bring banks. NFDC would support introducing the collection of textiles supported with EPR funding as this is likely to be the quickest and easiest way to encourage residents to recycle their clothing. Through a waste composition analysis which took place across the County in 2018, we know there is approximately 16,601 tonnes of textiles that go through the kerbside residual and DMR collections across Hampshire - this could be redirected into a kerbside textile collection, rather than going for incineration. However, there are concerns around contamination of textiles collected at the kerbside, due to residents putting their bins out the night before collection and the textiles getting wet, or residents using the service to dispose of old clothing which is damaged beyond repair as highlighted in this article <https://www.letsrecycle.com/news/latest-news/quality-concerns-kerbside-textile-recycling/>. Introducing kerbside textile collections would require the reprocessing capacity in the UK to be improved as per action 5, as currently many textiles are shipped to places like Senegal or down-cycled because they are of such poor quality, neither of these options is suitable in a closed loop textiles industry. Further work would be needed on whether this would be better provided by LAs, the third sector, or a combination of the two.

We feel that the actions in this chapter of the consultation are very much focused on recycling rather than reuse, and we would like to see more being done to encourage reuse of clothing. Clothing is a basic need, and any developments helping to reduce waste need to be accessible and fair for all. We are encouraged to see initiatives such as clothing rental schemes, which could play a huge part in reducing the amount of new clothes that are bought, but many of them operate expensive monthly subscription models which do not offer an alternative to buying cheap clothing for those on lower incomes. This means they are forced to buy new, low quality goods, rather than a more sustainable alternative.

Chapter 7: Furniture

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

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?

Aim: to address the negative environmental impacts of the furniture sector, by supporting more sustainable design, improved consumer information, enhanced collection, reuse, and repair services.

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

Please provide details / explain your answer.

As part of action two regarding improved labelling, we would like to see fire labels redesigned so they are printed onto furniture somehow to prevent the resident from removing them, allowing for the item to be reused, as this is a barrier to charities affecting flammable items like sofa or mattresses even if they are good quality. Additionally, if there is a clear standardised label, anyone collecting bulky waste can easily identify items that are suitable for reuse. This could come in the form of a QR code stitched into the fabric which when scanned gives information about the product and its component parts.

Charity collections can be slow with a large collection window of time which can put people off using this route if they are in a hurry to dispose of an item or do not wish to wait at home for a long period of time for the item to be collected. This can lead the resident to use a local authority bulky waste collection or taking the item to a HWRC, both of which could mean the item is damaged in transit reducing its quality to be used second hand. We feel that reverse logistics could play a part here and help to get items to a charity quicker and would collect the item at the point when the resident wants to get rid of their old item.

Discarded mattresses are a big issue, there needs to be investment in finding way to either manufacture mattresses differently to enable easier breakdown of components and recycling or finding a solution for recycling mattresses in their current form. An off-putting factor for mattress reuse is cleanliness. If there was some investment in a washing system that could sterilise mattresses or some way of making the outer fabric replaceable it would enable more mattress reuse. However, this would require investment.

We agree that furniture should have minimum standards set for such things as durability, repairability, recyclability etc, however again there is a balance to be struck if using better quality materials to make an item more durable means that it will no longer be affordable to those on lower incomes.

With regards to developing an EPR for bulky waste, we would welcome proposals on this and hope that it would enable improvement of bulky waste collections, as there are currently some barriers to reuse through this route some of which have already been mentioned in our response to chapter 3 but will reiterate them alongside the other barriers:

- Tonnages of furniture that have been reused are hard to quantify as it would require a member of the public or charity to use a weighbridge or calculate the weight using the Reuse Networks 'Measure Your Treasure' calculator
- There is often less tonnage to report on for the amount of effort/resources required to pass it on for reuse
- It can be a struggle to find reliable end markets for the volume of material. For example, charities often need to switch on and off the flow of items coming into their organisation to avoid what storage they have becoming flooded with items so are sometimes considered unreliable
- It is difficult to obtain/maximise value from reusable items once they've entered the waste management system as waste management systems are not designed to preserve items

If EPR funding allows innovation and the finances and resources to fund changes to Local Authority bulky waste collections, it could enable further scope for reuse and recycling. We'd also suggest that an EPR scheme for furniture should be consulted on before 2025.

The issues with furniture are similar to those of textiles, trends in homeware mean that furniture is disposed of earlier than necessary. These items are still perfectly usable, but as you mention in your summary of the problems regarding furniture, the attitude of consumers to second-hand goods that second hand is inferior. We would like to see steps to tackle this to encourage the reduction of less new furniture being bought in the first place. This will also lead to demand for furniture reuse.

There is also a skills gap in the repair of furniture. Repairing and refurbishing furniture tends to be for higher end or antique items and doesn't apply to lower quality or flat-packed furniture. If a cheaper item of furniture needs to be repaired, it's more likely to be discarded and replaced.

Finally, voluntary agreements and industry standards do need to be closely monitored and Government shouldn't be afraid to pursue regulation if it is necessary to achieve the aims.

Chapter 8: Electrical and Electronic Products

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

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?

Aim: to increase levels of collection of Waste Electronic and Electrical Equipment, increase reuse, repair and remanufacture of electronic and electrical products and develop options to design out waste using eco-design principles.

- 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 with the areas included in the review of the WEEE regulations and using financial incentives to move waste further up the hierarchy, including modulation of fees paid by producers to ensure they are always striving to increase the resource efficiency of their products. We also agree with giving reuse a higher weighting than recycling. However, one issue identified with collecting items for reuse at HWRCs is that these items can be bought by people who may not be intending them for reuse but instead to make money off them from sending elsewhere, something that would need to be addressed if HWRCs are going to be considered as a means of increasing WEEE reuse.

We support the proposal to improve systems of collections of WEEE for repair and reuse and the launching of WEEE funding pilots. In Hampshire, the majority of PI partners do not collect small WEEE through kerbside collections and we would be interested to see what is considered best practice if kerbside collections were to be made mandatory so we can align services accordingly. The HWRC network in Hampshire collected ~7,000 tonnes of small WEEE in 2019, (the figures for 2020 are skewed due to the pandemic) however a waste composition analysis across the county in 2018 shows that there is further tonnage that is not being captured. Under the current WEEE system it is only the cost of disposal that is covered by compliance schemes, if the WEEE compliance scheme was expanded so producers also paid the cost of collection, this would incentivise more authorities to collect WEEE, meaning far more items would be collected.

However, we do also think there is a place for enhanced retailer take back obligations. With so many electrical items being delivered straight to homes (especially larger items like washing machines and fridges) and those dropping these items off equipped for moving large items, with vans/lorries big enough to store them, it would be very quick and convenient for residents if old appliances are collected at the same time as new items are dropped off. Residents will not have to store old items whilst they are waiting for a charity/local authority bulky waste collection or the opportunity to take the item to the tip. It also means that if residents don't have the space in their house to store old items they won't get left outside where

inclement weather might mean they are no longer suitable for reuse. As a positive knock-on effect, it might also mean a reduction in fly-tipping of large electrical items.

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?

Our aim: to encourage a shift away from hard to recycle and single-use products, and support research and innovation into more sustainable materials and systems, reducing litter and plastic pollution as well as conserving material resources.

- 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 have responded to the EPR and DRS consultations separately.

Chapter 11: Food

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

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?

Aim: reduce food waste in the home and across the supply chain and take forward key policy commitments in this area including for certain businesses to measure, report and act on food waste.

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

Please provide details / explain your answer.

With food waste collections likely to be made mandatory under the Environment Bill, we think it's important that food waste prevention messages are used at the same time. Although studies by WRAP have shown that food waste collections can lead to a decrease in food waste as residents are able to see the quantity of food they are wasting, anecdotally we have seen through social media and resident engagement that there is confusion around food waste prevention and recycling. Residents often think that because they compost/recycle food waste through kerbside collection, they are preventing food waste, not making the

connection that even if food is turned into compost, it still means it has been wasted. We also hope that the increases in recycling rates that food waste collections bring, does not obscure the fact that food waste prevention is more important.

One of our Hampshire partner authorities received funding to run a food waste project with a full-time coordinator. The retailer funding the project decided to cancel the funding before the end date, however in the short time that the project was running it made a big difference in connecting different local groups, encouraging community growing schemes and sharing cooking skills. Projects like this can make a big difference at a grassroots level but Local Authorities require more resources to be able to deliver more projects which would all be supporting reduction of food waste.

The PI partnership in Hampshire regularly use the messaging and social media assets developed by Love Food Hate Waste and are pleased to see action four is to continue supporting WRAP to enable them to keep these campaigns running. NFDC share and support these messages. However, we would like to see these campaigns appearing on national media, in large advertising campaigns to help reach those people who do not engage with the types of media where the campaigns might be advertised. These messages and relevant local interventions through local authorities could be support a greater shift in behaviour change.

We support the continued Courtauld 2025 Commitment and its work across the food chain. We would like to see Government working more on the link between retailers and suppliers (i.e. farms) to ensure their practices are fair and food is not unnecessarily wasted due to practices like retailers rejecting produce because of its appearance, or cancelling orders at the last minute leading to huge amounts of produce being wasted https://feedbackglobal.org/wp-content/uploads/2018/08/Farm_waste_report_.pdf. We would also like to see help for the charities that are working to redistribute food in the UK, as this is very important for not only reducing food waste, but also for helping families in need. There is also a huge gap in education and skills around food. If food education and cookery are taught from school age, children will grow up with the skills they need to be confident preparing food, which all helps to reduce food waste. It also teaches the value of food which goes a long way to encouraging the right behaviour. Additionally, education around food that teaches proper storage, the difference between use by dates etc, will all go further to ensure food lasts longer.

Chapter 12: Monitoring and Evaluation

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

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

Our aim: monitor changes in waste prevention via a structured set of metrics, while continuing to develop more detailed methodologies to evaluate waste prevention policies.

- 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 with this approach and would like to see more information about these other targets published. Traditionally at the time DEFRA publish the waste data for the year all of the focus is on recycling rate, with

industry news such as LetsRecycle.com publishing recycling rate league tables and national news running stories about how the recycling rate has changed compared to the previous year. We would like to see total waste arisings and some of these other measures like carbon footprint on a consumption basis given as much attention.