



London Councils  
Transport and Environment  
Committee

**Borough Priorities for the Review of the  
Mayor's Municipal Waste Management  
Strategy (MMWMS)**

**POSITION STATEMENT**

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## **LONDON COUNCILS POSITION STATEMENT**

### **Executive Summary**

#### **London Councils and TEC**

1. London Councils is a cross-party organisation, funded and run by our member authorities to work on behalf of them all, regardless of political persuasion. We also act as the employers' organisation for the 32 London boroughs, providing advice, support and training, and representing them in negotiations.
2. We develop policy and do all we can to help our boroughs improve the services they deliver. We also run a range of services ourselves, all designed to make life better for Londoners.
3. The Transport and Environment Committee, TEC, works to ensure that London boroughs' concerns and best practice are taken fully into account in the development and implementation of the whole range of transport, environment and planning policies generated by Government departments, the European Union, and the Mayor of London. The committee also provides a range of high quality operational services.
4. TEC has agreed this *Position Statement* on behalf of London waste authorities following consultation with members and officers of these authorities. We recognise that this is a process of review. Whilst not suggesting a complete re-write of the current strategy, this *Position Statement* sets out the priorities in approach and content that boroughs would like to see reflected in the revised Mayor's municipal waste management strategy for London. The high-level Position Statement lists our top priorities for London. The high-level Statement, this summary document and the background document all constitute the overall *Position Statement*. The background document sets out some detail of the thinking that has informed the Statement.

#### **Key differences in approach that we would like to see in the revised strategy:**

5. A less prescriptive approach - The current strategy is unduly prescriptive in its approach. The Mayor's MWMS should be a strategic document which by implication cannot provide for every possible scenario. Our preferred approach is for the revised strategy to be a high level document, leaving individual waste authorities to interpret the strategy for their areas.
6. A focus on municipal waste - In view of the new duty on waste authorities to 'act in general conformity with', rather than the previous duty to 'have regard to' the Mayor's strategy, London Councils is very keen to see a revised strategy that is focussed on municipal waste. Business waste is outside the Mayor's remit.
7. An outcomes driven strategy - The current strategy is very much input focussed rather than outcomes driven. The emphasis of the strategy should be on what we want to see, not necessarily how we get there. Decisions should be devolved appropriately and explicitly to the boroughs who are able to come forward with solutions to suit local situations and demands.
8. Target setting - Ambitious targets are a good thing and Appendix 2 to the background document shows how London's waste authorities have improved their recycling performance over the 4 years from 2003/04 to 2006/07. The

process of arriving at targets must be revised for the new strategy. Boroughs are more willing to push the boundaries of current practice than they are given credit for. Very often, the limiting factor is resource.

9. A collaborative approach - Appendix 3 to the background document sets out our thoughts on how as a region we can significantly improve our recycling performance and move towards our vision of a 'zero waste to landfill' goal for London. A collaborative approach to target setting ensures buy-in and increases the likelihood of success.
10. Clear expectations - Linked to the point above is the need for a revised strategy, incorporating a range of proposals and targets placing demands on boroughs, to also provide an analysis of the resource implications of compliance. As a minimum, policies must be accompanied by an assessment of the financial implications for waste authorities, similar to an impact assessment carried out for national policies.
11. Settled arrangements - The current strategy made proposals about the transfer of significant borough responsibilities to the GLA including waste disposal functions. We would be surprised to see further proposals for changes to London waste governance structures in a revised strategy.

**Key differences in content and focus that we would like to see in the revised strategy:**

Waste Targets

12. Regional targets, if set in Policy, should be consistent with national targets. Otherwise they should be based on an intelligent and realistic assessment of the characteristics of the region, its past and current performance, and the potential for improvement.

Waste Growth (or rather, Reduction)

13. London Councils would like the revision of the waste strategy to look closely at the waste growth trajectory and review the GLA's assumptions in the light of more up to date data which suggests that the total amount of municipal waste produced by London seems to be on a downward trend<sup>1</sup>. London Councils wants to see a strategy that moves London further towards a reduction in the amount of waste generated for collection and management. This has an obvious impact on apportionment, land requirements and numbers of facilities to be provided.

Regional self-sufficiency, facilities and land-take

14. PPS10 requires regional planning bodies to "enable waste to be disposed of in one of the nearest appropriate locations". However, the London Plan places undue and restrictive emphasis on regional self sufficiency. London Councils would like to see a more a more explicit tilting of the balance towards 'proximity', particularly where the movement of waste and materials can draw on rail and river use.
15. The level of emphasis placed on new technologies within the Plan does not sit with the need to ensure that sufficient capacity is available to treat residual waste.

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<sup>1</sup> GLA Economics research published in July 2008

The projection in the Plan for numbers and types of facilities to be built is clearly undeliverable and must be reviewed.

16. The London Plan is over prescriptive with regards to the location of waste facilities (set out in Table 4A.8 of the London Plan) and the revised municipal waste management strategy should pull the Plan back from this level of detail.
17. London's local authorities face a number of competing pressures on land, of which providing waste management facilities is one. Reviewing the targets for waste volumes to be managed through a review of the underlying waste growth trajectory and a review of the self sufficiency targets is a key outcome that boroughs would like to see as part of the review of the Mayor's MWMS.

#### Presumption against incineration

18. The previous Mayor did not offer a reasoned justification for this policy preference other than a concern that incineration does not crowd out recycling, composting and the deployment of hydrogen producing technologies. Government policy and the EU classifies incineration with energy recovery as one category of 'energy recovery'. European countries with very high rates of recycling and energy from waste have shown that the two are able to coexist. Appendix 4 to the document provides some comparative analysis of incineration and landfilling.
19. London Councils would like to see the revised strategy take on an open stance towards the use of incineration with energy recovery, and such facilities for managing waste. Policies could then set the parameters and specification for operating efficiencies and safety standards in line with the new European definition of recovery, as set out in Annex II to the Revised Framework Directive on Waste.

#### **Further specific objectives that the revised strategy should address:**

##### Climate change

20. Tackling climate change is a key imperative for environmental and energy policy, and London, a world city must continue to lead ideas and action to show how, through strategic interventions, cities can significantly reduce emissions and adapt to the impacts of unavoidable climate change. The various technologies that recover energy from waste have significant potential to help London reduce its emissions or contribute to national reductions whilst providing a source of decentralised energy which has the potential to reduce transmission losses.
21. The drive on food waste is particularly important here. Selling the important link between waste management, greenhouse gas emissions and climate change to the general public is central to raising awareness about the need to reduce the amount of waste produced in London. London's waste authorities are keen to spearhead this campaign as part of a wider strategic, regional approach and to work with the Mayor to develop workable long term solutions.

##### Waste minimisation

22. London Councils view is that tackling municipal waste effectively in London requires a stronger focus on waste minimisation. The current municipal waste management strategy makes proposals for waste minimisation and reuse but London Councils would like to see the revised strategy go further. Action will

require a mix of policy approaches which require leadership on collaborative approaches to communicating and educating all sectors of the community on how to minimise their waste. There may also be need for collaboration to lobby for government action and legislation.

### Producer responsibility

23. The way Producer Responsibility has been implemented to date has meant that the distribution of costs for the collection and recycling of packaging is increasingly likely to fall on local authorities. As long as the costs of complying with obligations under the Packaging Directive do not fall entirely on producers, the incentive is not there to alter behaviour, either through packaging minimisation or through switching materials. London Councils members would like to see more done to further accelerate the reduction of unnecessary and non-recyclable packaging (such as the various types of plastics for which there is very little recycling capacity) and would welcome ideas and policies in the revised strategy that could achieve this. London Councils would be keen to work with the Mayor through the revised strategy to find ways of addressing this situation in London.

### **Looking to the future:**

24. After operating under a municipal waste management strategy for a number of years, London authorities can bring a wealth of operational experience to the table. London Councils looks forward to working with the Mayor and his team in the development of the revised Mayor's municipal waste management strategy over the coming months. Boroughs as waste planning authorities, waste collection authorities and waste disposal authorities, as well the statutory joint waste disposal authorities will have a key role to play in the implementation of the strategy once agreed. In implementing the strategy, they will have to take account of their local circumstances within the context of the overarching good of London and within the context of national and European policies and targets. It is therefore in all our interests to ensure that the revised strategy is developed within a collaborative framework and is focussed on the right objectives whilst removing barriers and allowing the boroughs the flexibility and appropriate support to deliver the most appropriate solutions for London's waste management needs.

25. Appendix 5 sets out London Councils comments on 12 key policies and our historical position on the remainder of the 44 policies in the current municipal waste management strategy – Rethinking Rubbish in London.

## APPENDIX 1

### LONDON COUNCILS POSITION STATEMENT - BACKGROUND PAPER

#### The legislative drivers for the Strategy and for change

##### The Greater London Authority Acts

1. The GLA Act 1999 (s353) requires the Mayor of London to prepare and publish a municipal waste management strategy containing the Mayor's proposals and policies for the *recovery, treatment and disposal* of municipal waste. The Act also provides that the strategy may contain other proposals and policies relating to municipal waste as the Mayor considers appropriate. The Act (s355) required that waste authorities 'shall have regard to' the Mayor's strategy in exercising any of their functions in relation to waste on land (Part II of the Environmental Protection Act 1990).
2. Part 8 of the GLA Act 2007 enhances the powers of the Mayor with regards to his municipal waste management strategy. Section 37 of this Act requires that waste authorities, in delivering their functions, must 'act in general conformity with' the Mayor's strategy with the caveat that complying with this requirement should not impose excessive additional costs on the authority.
3. The duty of 'general conformity' replaces the requirement to 'have regard to' and will impact directly on London's waste authorities (unitary authorities handling collection and disposal of waste; collection-only authorities; and statutory joint waste disposal authorities (SJWDAs). This provision strengthens the Mayor's hand when taken alongside the stronger Mayoral powers over planning (in Part 7 of the GLA Act 2007), the Mayor's existing powers of direction and the enhanced requirement on boroughs to inform the Mayor if they are going to tender a waste contract (section 39).
4. The duty of 'general conformity' is new to waste management. It is however an established principle in planning. The Government's Planning Policy Statement (PPS) 12 sets out in paragraph 4.20 the Secretary of State's view as follows:

'The test is of general conformity and not conformity. This means that it is only where an inconsistency or omission in a development plan document would cause significant harm to the implementation of the spatial development strategy, that it should be considered to not be in general conformity. The fact that the development plan document is inconsistent with one or more policies in the spatial development strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather the test is how significant the inconsistency is from the point of view of delivery of the spatial development strategy'.

5. These are now new 'rules of engagement' with the Mayor's MWMS for London's waste authorities and the agreed view is that it places a stricter obligation on

waste authorities. Judging by the previous Mayor's disposition towards, for example, Belvedere, this requirement could have significant implications for waste authorities in London. It is still unclear how this requirement will be tested. However, we assume that under the current requirement for 'general conformity' (alongside the new planning powers), the Mayor would have been able to stand in the way of this strategic facility.

6. Section 41 of the GLA Act 1999 requires the Mayor to ensure that his strategies are consistent with national policies. These are interpreted in section 424 as being policies available in written form that have been laid, presented or announced in Parliament or published by a Government minister. Further, The Mayor's plans and strategies should take account of European programmes. The Mayor must also have regard to any relevant Government guidance or statutory instruments relating to the implementation of European Community requirements.
7. Part 7 of the GLA Act (referred to earlier) introduced a discretionary power for the Mayor to assume jurisdiction over small numbers of planning applications that are of strategic importance to London and determine them in place of the borough. The Mayor will continue to be able to direct a borough to refuse a planning application where he has not taken over the application, if he considers that to grant planning permission would be contrary to the London Plan or prejudice its implementation or otherwise be contrary to good strategic planning in London.
8. Boroughs are now required to consult the Mayor on planning applications of potential strategic importance as defined in the Mayor of London Order 2008, for the Mayor to determine whether they raise issues of strategic importance that warrant his intervention.
9. With regards to waste, the Mayor of London Order 2008 (which came into force on 6 April 2008) requires local planning authorities to notify the Mayor of any applications of 'potential strategic importance' as defined in a schedule to the Order. These include all applications that fall under Category 2B of Part 1 of the Schedule to the Order i.e.:
  - development to provide an installation with capacity for a throughput of more than
    - a. 5,000 tonnes per annum of hazardous waste; or
    - b. 50,000 tonnes per annum of waste;
  - produced outside the land in respect of which planning permission is sought;
  - Waste development where the development occupies more than one hectare.
10. A survey of planned and recently commissioned facilities in London from the beginning of 2005 carried out by London Councils in 2007 indicates that this provision would have made 10 out of the 14 facilities in London eligible for the Mayor's call-in on the basis of installation capacity alone. This raises questions about how waste planning authorities maintain sufficient local control over decisions on waste facilities for their areas.

### The Revised EU Waste Directive

11. The Revised EU Framework Directive on waste which, by current estimates is due to be published in the EU law book by the end of 2008 and therefore required to be transposed into UK law by December 2010, sets out revised EU wide targets of:
  - 50% (by weight) by 2020 for the preparing for re-use and recycling of waste materials such as at least paper, metal, plastic and glass from households and similar waste streams, and
  - 70% by 2020 for re-use and recycling of non hazardous construction and demolition waste
12. With regards to the re-use and recycling targets and the requirement (by 2015) for separate collections to assure the quality of recyclate, the UK Government has signaled its intention to table 2 'minute statements' to the effect that Government will not exclude waste streams not listed in the directive (such as green waste, food waste) from contributing towards recycling targets; and that Government will not be forcing separate collection on councils where co-mingled collections prove to be the most effective in the local circumstances.
13. The new directive will oblige Member States to establish waste management plans and waste prevention programmes with waste prevention objectives 5 years after the directive comes into force. Further to this duty there is provision for the Commission to propose - if appropriate - by the end of 2014, the setting of waste prevention and decoupling objectives for 2020.
14. Incineration is categorised as recovery, provided it meets certain energy efficiency standards. The standards will have the effect of allowing only the most energy efficient existing municipal solid waste incinerators to be classified as recovery installations.
15. The five-stage waste hierarchy, which is designed to prevent and reduce waste production, is made more certain and comprehensive. The hierarchy lays down an order of preference for waste operations: *prevention, re-use, recycling, other recovery operations and, as a last resort, safe and environmentally sound disposal*. This will be treated as "a priority order", in waste prevention and management legislation rather than as a "guiding principle". Departing from the hierarchy may only be possible where it is justified by "life cycle" thinking on the overall impacts of the generation and management of such waste.
16. The directive further includes a definition of by-products and of the "end-of-waste" status. It introduces an extended producer responsibility and requires Member States to take measures to encourage the separate collection of bio-waste.

### **The policy drivers for the Strategy and for change**

#### Waste Strategy 2007

17. Government published its revised waste strategy for England (WS2007) on 24 May 2007. The strategy revises previous strategy published in 2000 and sets out Government's vision for local authorities' waste services to 2020.
18. The key headline targets in WS2007 of importance to local authorities include:

- Reduction in the amount of household waste not reused, recycled or composted from 22.2m tonnes in 2000 to:
  - 15.8m tonnes in 2010 (29% [a reduction on year 2000])
  - 12.2m tonnes in 2020 (45% [a reduction on year 2000])
 This is equivalent to a 50% reduction from 450 kg per person (in 2000) to 225 kg (2020).
- Recycling and composting of household waste:
  - 40% in 2010
  - 45% in 2015
  - 50% in 2020 – *this is currently in line with revised EU Directive targets for MSW*
- Recovery of municipal waste:
  - 53% in 2010
  - 67% in 2015
  - 75% in 2020 – *currently goes beyond revised EU Directive targets*
- Land-filling of commercial and industrial waste to fall by 20% by 2010 (compared with 2004)
- Land-filling of construction, demolition and excavation wastes to fall by 50% by 2012.

19. The intended impact of the strategy is a net overall reduction in greenhouse gas emissions from waste management of at least 9.3 million tonnes (equivalent) per year – compared to 2006 levels.

20. On a separate front, Government is promoting legislation (in the Climate Change Bill) to enable local authorities to pilot the introduction of financial incentives for waste reduction and recycling. Local authorities will be able to introduce revenue neutral schemes where householders who recycle would receive payments from householders who do not. Defra is currently consulting on a range of guidance documents on this initiative. Feedback from London waste authorities is that there is very little appetite for these schemes as designed and it is very unlikely that any of the pilots will come from London.

21. WS2007 sets the separate collection and treatment of food waste as the next frontier in the management of municipal waste by local authorities, with the emphasis on the potential of anaerobic digestion as a preferred new technology for the treatment of this waste stream. Defra has started to run a series of programmes through WRAP and others to look at this sector. Work in this area also converges with EU policy on biowaste.

22. Defra published in July 2008, an Annual Progress Report on actions to implement the key proposals in WS2007. The 'Policy Measures' and 'Issues and Priorities for the Year Ahead' provide insights into some of the areas that should inform the Mayor's revised strategy although not all relate to the scope of the strategy. Some of the key issues include:

- Waste National Indicators - There are three waste indicators<sup>2</sup> in the new local government performance framework against which all local authorities will be required to report progress. Their inclusion in a small set of 198 national indicators for local authorities reflects the national importance of local action

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<sup>2</sup> NI191 – Residual household waste per household;  
 NI192 - Percentage of household waste sent for reuse, recycling and composting;  
 NI193 – Percentage of municipal waste landfilled

on waste. Moreover, the vast majority of local areas (83%) have agreed to include at least one waste improvement target in their local area agreements (LAAs) out of up to 35 mandatory targets which they must include. In London 21 of the 33 boroughs have signed up to LAA targets for NI192 (Percentage of household waste sent for reuse, recycling and composting) whilst the others have to report against this indicator.

- Waste growth and waste prevention - Waste growth in the municipal sector, has continued at a significantly lower rate than up to about 5 years ago. The reasons for this slower rate are not fully understood, at present, although the level of waste growth has a significant impact on both environmental impacts, costs and the amount of disposal infrastructure needed to meet the EU landfill diversion targets. The quality and timeliness of municipal waste data is generally very good. However, current Mayoral targets under the London Plan for waste resource recovery and borough-by-borough apportionment for management are based on a growth trajectory that can no longer be supported. The revised strategy needs to consider how to take account of this slower growth using the most up to date data. Relatively high prices for a range of commodities including food and fuel may impact on levels of waste and recycling. These trends further strengthen the case for a review of waste growth figures.
- Landfill Tax Escalator - the scheduled £8 per tonne landfill tax escalator came into effect raising the standard rate from £24 per tonne to £32 per tonne from the 1<sup>st</sup> of April 2008. The landfill tax escalator is already having an effect on investment in waste management facilities with plans for recycling and energy from waste facilities coming forward. Landfill Tax will reach £48 per tonne during the 2010-11 financial year. This is a key factor for the future revised strategy.
- Priority waste materials and sectors – This is an area currently receiving significant attention from Defra. Discussions with stakeholders have suggested to Defra that the aim of developing strategies for particular waste sectors and materials – as identified in Waste Strategy 2007 – is the right approach, and that this process needs to be taken further. Overall targets for all commercial and industrial waste grouped together are felt to be less helpful, especially because of the diversity of this waste stream and because combined targets based on weight may underplay the different environmental impacts of different kinds of waste. Defra has already taken steps to develop sectoral approaches, especially in relation to waste from the construction, food, packaging and retail sectors; this will be taken further over the coming years. London's waste authorities should be looking to take the lead in developing approaches for London.
- Packaging - New, higher packaging targets came into force in March 2008. This will save over 8 million tonnes of CO<sub>2</sub> in the current year. The targets will increase again over the following two years to deliver even greater savings in CO<sub>2</sub>. Defra and WRAP are working with stakeholders to develop a broad vision for the longer term for packaging. This will include continuing close working with retailers and local authorities, as well as with other players. The Courtauld Commitment – an agreement between WRAP and the major grocery organisations – will deliver new packaging solutions and technologies so that less waste ends up in the household bin. London Councils members would like to see more done to further accelerate the reduction of unnecessary and non-recyclable packaging (such as the various types of plastics for which there is very little recycling capacity) and would welcome ideas and policies in the revised strategy that could achieve this.

- Waste treatment infrastructure - It remains important to ensure that the necessary infrastructure is provided without unnecessary delay, especially to ensure that London's authorities achieve our EU landfill diversion targets. There is the emerging growth in merchant facilities that can take waste from both the municipal and non-municipal sectors, encouraged in particular by the landfill tax escalator. BERR have confirmed their intention to increase renewable obligations certificates (ROC) bands for a variety of waste technologies, whilst Defra have reached agreement with Treasury and HMRC on the list of equipment eligible for the new Enhanced Capital Allowance for secondary recovered fuel burning investments. The Government's Renewables Energy Strategy Consultation, published in June 2008, has confirmed the key role of waste biomass as a renewable fuel. London's waste authorities need to be prepared to take advantage of these opportunities in a strategic way.

Regional planning policy – impacts on the waste strategy

23. The original London Plan was published on 10 February 2004. Early Alterations to the plan's housing provision targets and to waste and minerals policies were published in December 2006. Further Alterations to the Plan (including minor alterations on borough level waste apportionment) were consulted on in late 2006 and the process of review carried through most of 2007. The current London Plan, which consolidates all of the alterations since 2004 was published in February 2008. It takes 2025/26 as its formal end date. However, many of its targets and statistics relate to earlier years (especially 2016).
24. When the previous Mayor announced the review culminating in the Further Alterations, he declared in his Statement of Intent that tackling climate change would be the key environmental imperative driving changes to the London and that achieving drastic reductions in greenhouse gas emissions would be central to the review of the Plan. This intent has been largely carried through in Objective 6 (and chapter 4) of the London Plan i.e. to make London an exemplary world city in mitigating and adapting to climate change and a more attractive, well designed and green city.
25. The Mayor is also required by law to produce other strategies for London one of which is the municipal waste management strategy. Each strategy must be consistent with the others and the London Plan provides the integrating framework for all these strategies. London Plan policies and targets will supersede, where they update any of the policies and targets in earlier Mayoral strategies.
26. The consolidated London Plan contains a number of specific waste related policies. The implications of these for the waste strategy are considered in turn below.
27. The Landfill Allowance Trading Scheme (LATS) was implemented in 2005 and has since placed waste authorities under pressure to find ways of diverting biodegradable waste from landfill in order to stay within allocated allowances and avoid fines under the scheme. This pressure is a major driver for investment in upstream waste management approaches, including investment in new facilities. LATS was introduced under the Waste and Emissions Trading (WET) Act 2003. It was however supported by statutory guidance which uses a definition of municipal waste for the purposes of LATS that is different from the definition in

the Act<sup>3</sup>. This discrepancy has caused considerable uncertainty and has led to an application for judicial review by the Western Riverside Waste Authority. Following consultation with key stakeholders, Defra is now minded to change the law to fit the guidance. However until the law is changed, imposition of fines and penalties by Defra for failure to meet allocations under LATS will be problematic. Although all of this may not pose a particular problem leading up to the first target year (2009/10) because of the availability of surplus allowances, the projections based on these allowances are critical to waste and planning authority decisions on the level of investment required and how this is likely to translate into land take.

### **Waste targets**

28. The targets for recycling and composting set in Policy 4A.21 relate to municipal waste. However, waste authorities report on performance against national targets for household waste. The targets for recycling and composting of household waste in WS2007 are 40%, 45% and 50% for 2010, 2015 and 2020 respectively. Targets for municipal waste in WS2007 are recovery targets. Whilst the volume difference represented by these different approaches may be small, it is however significant for land use planning and investment in treatment capacity.
29. Regional targets, if set in Policy, should be consistent with national targets, providing a continuum. If they are to change, regional targets should reflect more closely the characteristics of the region, its past and current performance, and a realistic assessment of the potential for improvement.
30. A revised strategy, incorporating a range of proposals and targets placing demands on boroughs, should also provide an analysis of the resource implications of compliance. As a minimum, policies must be accompanied by an assessment of the financial implications for waste authorities, similar to an impact assessment carried out for national policies. This approach will further help to clarify expectations on all sides about what can be realistically achieved and the areas where innovative joint approaches might open up new funding streams to help achieve the strategy's objectives.
31. The national household recycling target for 2005 was 25%. Authorities in England achieved 27% with performance ranging between 6% and 50% whilst London's contribution to the national target (17%) was based on a range from under 10% to over 30%. The point of this is that the achievement of national targets depends on variable achievement across the country. It is reasonable to expect a strong contribution from London towards the achievement of national household recycling targets as set in WS2007. Government, in considering the revisions to the Mayor's powers in the GLA Act accepted however that it was unrealistic to compare London, a predominantly urban region, with other English regions and expect the same level of performance across all waste streams.
32. London's waste authorities want to improve their performance. London Councils has however maintained the position that compelling London's waste authorities to collect green garden waste in order to meet recycling and composting performance targets provides a perverse incentive to increase the volume of waste collected. Green garden waste is a high tonnage waste stream which easily pushes up recycling and composting performance. However, it also increases the volumes of waste overall, increases the cost of collection and

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<sup>3</sup> The definition in the WET Act exactly transposes the text of the EU Landfill Directive

increases the cost of provision of facilities for recycling, treatment and energy recovery.

33. London Councils believe that regional targets in the London Plan or in the revised Mayor's municipal waste strategy should reinforce national targets i.e. set targets for the same waste streams but within that, reflect London's particular circumstances. There is potential to drive waste authorities' performance in the collection and recycling of dry recyclables, even taking account of the limitations on the number of receptacles for separate collection that can be accommodated by flats which comprise a large proportion of London's residential tenure, particularly in inner London. There is also huge potential for the collection and treatment of food and related waste from households and businesses. These opportunities should be reflected in the setting of targets for household waste recycling and for recovery of municipal waste.
34. The new National Indicator (NI192) makes no distinction between dry recycling and composting (as was under the previous BV82 regime), thus creating a disadvantage for some parts of London. A revised strategy should reflect these differing streams – dry recycling, food waste, green garden waste and re-use, rather than encourage the 'generation' of green garden waste for collection where this simply adds to waste tonnages to be managed.
35. New targets should reflect a number of elements. Dry recycling provides a legitimate diversion from the existing waste stream. Food waste recycling again diverts waste away from incineration or landfill through a more sustainable route. It is therefore entirely reasonable for London to be judged against these sub-indicators. However, it is desirable for green garden waste to be recorded separately, to enable it to be judged as a different issue.
36. A further complication is the inclusion of re-use in the new national indicator. In a similar manner to green garden waste, this has the potential to bring more waste into the system. Although waste is being diverted from landfill, it may be that statistical returns actually demonstrate which authorities are best at co-ordinating with re-use organisations rather than showing the true level of reuse.
37. London Councils would like to work with the Mayor to look at this issues more closely. It may be possible to split the indicator into four elements - dry, green, food and re-use, and whilst government may not publish annual performance in such a detailed manner, WasteDataFlow does provide the option to analyse performance in this way. This option may not allow easy direct comparison with the rest of the country, but it is likely to better serve the needs of London and may even provide a national template for more sustainable target setting on waste.
38. London Councils strongly urges that the revised waste strategy sets out options for taking these forward on the basis of incentivising the best performers, for example through taking a clear joint position on collection methods<sup>4</sup> (in the light of the Government's proposed 'minute-statement' to the EU on collection of recyclate) and through the selective use of the Mayor's new powers over applications for waste facilities.

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<sup>4</sup> This is not a position that boroughs have supported in the past but would be a radical offer to move towards creating an agreed basis for commercial entities to invest further in treatment capacity in or for the region.

### **Waste growth/reduction**

39. The figures used to compute waste arisings and waste to be managed assume waste continuing to grow through to 2020. Defra's figures show that waste arisings are actually falling nationally. Whilst total municipal waste increased by 1.4% between 2005/06 and 2006/07, validated quarterly figures from Defra show a decrease in total MSW arising of 0.3 million tonnes in the year to end December 2007 i.e. a 1% fall. All of these contrast with the compound growth rate assumed by the GLA at 2% per annum from 2006.
40. London Councils would like the revision of the waste strategy to look closely at the waste growth trajectory and review the GLA's assumptions in the light of more up to date data which suggests that the rate of waste growth is, and will be much lower as waste growth is de-coupled from economic growth. The GLA Economics paper, "London's environmental effectiveness – an update" published in July 2008 reports that the total amount of municipal waste produced by London seems to be on a downward trend. London Councils wants to see a strategy that moves London further towards a reduction in the amount of waste generated for collection and management. The total volume of waste to be managed has an obvious impact on apportionment, land requirements and numbers of facilities to be provided. London boroughs are more likely to support a strategy that takes a realistic view of this issue as waste authorities cannot afford speculative capacity provision.

### **Regional self sufficiency, facilities and land take**

41. Policy 4A.21 entrenches the principle of '*regional self sufficiency*', requiring a set and increasing percentage of London's waste to be managed within London rising to 85% (20.6m tonnes) to be managed by 2020. These waste volumes are based on growth projections following a trajectory which the EiP Panel on the Further Alterations found high but supported in the absence of more reliable data from the Environment Agency or GOL. The volume of waste to be managed also set the scene for the borough apportionments and the *Panel asked for these figures to be reviewed when the relevant chapter of the Plan or waste strategies were being reviewed.*
42. PPS10 requires regional planning bodies to "enable waste to be disposed of in one of the nearest appropriate locations". However, the London Plan places undue emphasis on regional self sufficiency, which may result in waste planning authorities in outer London being prevented from developing cross-border (regional borders) proposals in their waste planning strategies to develop and use waste management capacity in neighbouring regions, even where these are economically advantageous and have obvious environmental benefits.
43. In 2007, the High Court quashed two directions from the Mayor to West London Waste Authority which would have restricted the waste disposal authority's flexibility to consider bids from a waste management facility 200 metres outside the regional boundary. Regional self sufficiency as interpreted is too rigid to allow London's waste authorities to effectively manage municipal waste. London Councils would like to see a more explicit tilting of the balance towards 'proximity', particularly where the movement of waste and materials can draw on rail and river use.
44. Further, the level of emphasis placed on new technologies within the Plan does not sit with the need to ensure that sufficient capacity is available to treat residual waste. The Plan assumes that 308 new facilities will be needed by 2020 (including 16 Mechanical Biological Treatment (MBT) plants, 25 Anaerobic

Digestion (AD) plants, and 11 Gasification/Pyrolysis plants). This projection for numbers and types of facilities to be built is clearly excessive and undeliverable and must be reviewed.

45. The UK waste industry is consolidated, with only a small number of companies able to consider financing, designing and building these facilities. The provision of the number of facilities suggested will very likely overwhelm the capacity of the industry, particularly with growing demand from other regions. Further, London Councils believes that decisions regarding the specific locations appropriate for waste facilities should be made by local waste planning authorities and not set out in detail in the London Plan or the municipal waste management strategy.
46. The Plan is therefore over prescriptive with regards to the location of waste facilities (set out in Table 4A.8) and the future municipal waste management strategy should pull the Plan back from this level of detail, allowing a less prescriptive, 'local needs' based interpretation.
47. Regional self sufficiency targets and assumptions create a number of unresolved conflicts with other demands on land use in London, especially in relation to housing targets. The Plan sets out an additional land requirement of some 328 ha in total for waste management purposes in London over the period 2005 – 2020. This includes re-use of 'surplus' waste transfer site capacity of 113 ha, leaving a requirement for 14.3 ha per year to be found.
48. London's local authorities face a number of competing pressures on land, of which providing waste management facilities is one. Reviewing the targets for waste volumes to be managed through a review of the underlying waste growth trajectory and a review of the self sufficiency targets is a key outcome that boroughs would like to see as part of the review of the Mayor's MWMS.
49. It is worth noting in this context that the Revised Waste Framework Directive explicitly states that the principles of proximity and self-sufficiency are not intended to mean that each member state has to possess the full range of final recovery facilities within that member state. A similar pragmatic approach is required for the London region.

#### ***Presumption against incineration***

50. Policy 4A.21 also refers to the priority that the Mayor will give to waste management methods. This is in line with government policy in regard to the waste hierarchy. However, the policy further states that new and emerging advanced conversion technologies for waste will be considered in preference to incineration in view of the existing incineration capacity in London. The previous Mayor did not offer a reasoned justification for this policy preference other than a concern that incineration does not crowd out recycling, composting and the deployment of hydrogen producing technologies.
51. Government policy as set out in WS2007 considers energy from waste as one category of 'energy recovery'. Incineration with energy recovery is similarly classified by the revised EU Waste Framework Directive<sup>5</sup>. Recovering energy from waste which cannot sensibly be reused or recycled is an essential component of a well-balanced energy policy. Evidence from neighbouring countries (such as Germany, Netherlands, Belgium, Denmark, Sweden,

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<sup>5</sup> One of the key agreements in the revised waste Framework Directive was on the status of incineration (demonstrating high efficiency standards) as a method of recovery rather than disposal.

Switzerland and Austria) where very high rates of recycling and energy from waste are able to coexist, demonstrates that a vigorous energy from waste policy, incorporating direct combustion (incineration) is compatible with high recycling rates.

52. The evidence from Europe is that many of the “new” technologies have not yet succeeded in establishing themselves as economically viable disposal solutions for municipal solid waste. In effect therefore the Plan is committing London to a gamble on technologies that have not yet proven they are affordable or reliable. There are significant operational and investment risks associated with new and emerging technologies and, relying on these technologies to deliver the required levels of waste disposal is extremely risky. Should any problems arise, London will be forced to rely on landfill for waste disposal, which is not a sustainable solution for future waste management. It is vital, in any rational risk assessment, to have a fall-back position using proven technologies such as direct combustion, in case the new technologies fail to bring all the benefits that the Mayor anticipates. The Mayor’s Policy therefore opens London’s waste authorities up to considerably high operational and financial risks.
53. This does not imply that London’s waste authorities are not evaluating and making the necessary investments in new waste technologies. Since 2005, three MBT plants with a combined capacity of 470,000 tonnes have been deployed in London. A number of other facilities are in the pipeline and many London waste authorities are actively considering anaerobic digestion as an option for the treatment of food waste with the advent of a new generation of non-slurry based digesters. Wandsworth borough, earlier this year started a trial for estates based pyrolysis of residual waste using the Auto-Bin system, a pioneering small scale pyrolysis plant fed by waste from estate chutes after separation of recyclables.
54. London Councils would like to see the revised strategy take on an open stance towards the use of incineration with energy recovery, and such facilities for managing residual waste. Policies could then set the parameters and specification for operating efficiencies and safety standards in line with the new European definition of recovery, as set out in Annex II to the Revised Framework Directive on Waste.

## Horizon Scanning

### Population growth

55. London's population is forecast to grow over the next two decades. This growth will be reflected as overall growth and specifically as growth in numbers of households. This expectation underlies the planned growth in housing particularly in the Thames Gateway area. Waste is measured per head and the more relevant statistic is the growth in numbers from 7.57m currently to a range of estimates in the London Plan between 7.94m and 8.19m in 2016, rising to between 8.26m and 8.71m people in 2026.
56. The GLA Economics paper, "London's environmental effectiveness – an update" published in July 2008 recognises that waste management continues to be a controversial subject and a critical challenge for London. It however reports that the total amount of municipal waste produced by London seems to be on a downward trend. There is therefore no clear positive correlation between population growth and overall waste growth. Considering waste per unit of output, London is by far the most environmentally effective region in waste terms. However, London Councils is keen to compare and challenge London's performance against other global cities.

### Economic growth (or slowdown)

57. London's economy has continued to grow, although more slowly than forecast. Consumer confidence has however fallen with a fall in house price inflation as the housing market has been weakened by the credit crunch and weakening economic prospects. The retail sector is stagnant and trends point towards a weakening. The overall effect is a slowdown in generation of waste both from households and businesses as people look to maximise resource recovery from materials and become more discerning about buying behaviour that simply pays for waste.
58. The 'zero waste' or maximum recovery message is becoming easier to sell, as it has clear economic benefits. Many businesses are moving towards zero waste to landfill policies in response to tax instruments such as landfill tax. The squeeze on investment credit and the overall economic outlook over the medium term suggests that more waste management effort and capacity development needs to be going upstream, i.e. towards waste minimisation, reuse, recycling and composting as these offer the most cost effective ways of responding to the waste challenge. Sharp increases in commodity prices also mean that the value of recycled materials are increasing, making higher rates of recycling for many materials easier to justify on a cost/benefit basis. London Councils had always contended that the London Plan projections for the numbers and types of waste treatment facilities required in London were excessive, these projections now look even more unrealistic under the current economic scenario.

### Producer Responsibility<sup>6</sup>

59. The Producer Responsibility Obligations (Packaging Waste) Regulations 2005 are the Government's means of implementing the requirements of the Packaging Waste Directive (Council Directive 94/62/EC on packaging and packaging

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<sup>6</sup> Based on the findings of research by Eunomia Research & Consulting commissioned by London Waste Action (2007)

waste<sup>10</sup>) (as amended). The regulations concentrate on companies that handle more than 50 tonnes of packaging per annum and have a turnover of more than £2 million per annum and apply the shared producer responsibility approach.

60. The Directive was implemented in the UK in 1997 as the Producer Responsibility Obligations (Packaging Waste) Regulations 1997 and these were amended by a range of statutory instruments and re-issued in consolidated form in December 2005. This suggests that the system has not been without its problems.
61. Producer responsibility is widely felt to have been less effective in the UK compared to other European countries. Some of this has been attributed to the way it has been implemented. Arguments have been put forward for a complete review on the basis of the limited effect of the existing policy, coupled with the fact that the distribution of costs for the collection and recycling of packaging is increasingly likely to fall, at the margin, on local authorities.
62. Producer responsibility mechanisms hold out the promise of the collection of materials for recycling being funded by the obligated entities and the system should have the effect of shifting the burden of cost away from tax payers and towards producers (and consumers of packaging and products). The reality of the implementation of this Directive in the UK has been that it has been 'low cost' to producers. As producers' costs stay low, so the burden of taxation has to increase. As long as the costs of complying with obligations under the Packaging Directive do not fall entirely on producers, the incentive is not there to alter behaviour, either through packaging minimisation or through switching materials.
63. London Councils would be keen to work with the Mayor through the revised strategy to find ways of addressing this situation in London. Policies could help ensure that those who make use of any particular type of packaging had a greater incentive to use less of it, and to ensure that it could be recycled under systems which they, ultimately, had to support financially. London Councils would support moves towards fewer types of plastics entering the household waste stream to ensure the materials can be recycled.
64. Article 8 (Extended Producer Responsibility) of the revised Waste Framework Directive makes provision for member states to take legislative and non-legislative measures to put in place extended producer responsibility to include acceptance of returned products and of the waste that remains after those products have been used, as well as the subsequent management of the waste and financial responsibility for such activities. Member states can also take appropriate measures to encourage the design of products in order to reduce their environmental impacts and the generation of waste in the course of the production and subsequent use of products, and in order to ensure that the recovery and disposal of products that have become waste takes place in accordance with the waste hierarchy (Article 4) and requirements for the protection of human health and the environment (Article 13).
65. Such policies would change the nature of funding for compliance with the Packaging Regulations and by implication local authority waste collections. Costs to producers will reflect the true cost of packaging and therefore increase; and costs to London's taxpayers would fall by an equivalent amount. Collective (GLA and London Councils) lobbying could ensure that any money generated would be re-invested in London's waste management. Further, placing the burden firmly on the producers would also have the effect of reducing packaging entering the household waste stream and contribute significantly towards waste

minimisation efforts. London Councils' pioneering work on pushing for a ban on free single use shopping bags points the way towards what could be achieved in this regard, especially in changing public expectations.

### Climate Change

66. Climate change is now the key new driver for waste management policy. This stems from the potential for different waste management options to contribute dramatically different amounts of greenhouse gas emissions. Waste management options determine how much more energy will be used in passing the waste through the chosen option and how the carbon in the waste will be released back into the environment. Landfill accounted for 57% of the waste generated in London in 2006/07. Overall landfill contributes about 3% of UK greenhouse gas emissions largely from methane which is 21 times more potent than carbon dioxide (CO<sub>2</sub>) as a greenhouse gas.
67. On the other hand, the various technologies that recover energy from waste have significant potential to help London reduce its emissions or contribute to national reductions whilst providing a source of de-centralised energy which has the potential to reduce transmission losses. The drive on food waste is particularly important here and London's waste authorities are keen to develop workable long term solutions but may, in the end, be restricted by regional self sufficiency targets.
68. Tackling climate change is a key imperative for environmental and energy policy, and London, a world city must continue to lead ideas and action to show how, through strategic interventions, cities can significantly reduce emissions and adapt to the impacts of unavoidable climate change.
69. Emphasising the principles in the waste hierarchy in the revised strategy can help turn waste materials into resources to be valued, reducing the need for increasing extraction of raw materials and fossil fuels. New waste management technologies already available in the marketplace offer opportunities to recover materials and energy from waste which would otherwise be landfilled. Selling the important link between waste management, greenhouse gas emissions and climate change to the general public is central to raising awareness about the need to reduce the amount of waste produced in London and waste authorities are keen to spearhead this campaign as part of a wider strategic, regional approach.
70. Twenty-one London authorities have agreed LAAs including targets for National Indicator (NI) 186 i.e. per capita reductions of CO<sub>2</sub> emissions in the local authority's area and 15 have agreed targets for NI185 (CO<sub>2</sub> reduction from the local authority's operations). Reductions in CO<sub>2</sub> emissions from collection, transport and treatment of waste will be critical to achieving these targets.

### Waste minimisation

71. London Councils' view is that tackling municipal waste effectively in London requires a stronger focus on waste minimisation. The current municipal waste management strategy makes proposals for waste minimisation and reuse but London Councils would like to see the revised strategy go further.
72. The concept of '*zero waste to landfill*' has gained ground recently both as a corporate strategy for company cost reduction, and as a policy approach by some

European countries or regions. In this context, zero waste to landfill involves rigorous waste prevention, recycling rates up to and in excess of 70%, and further resource recovery (including incineration) to reduce the residual waste for final disposal to the barest minimum.

73. London Councils is keen to see London move in this direction as a longer term goal. However, the starting point is a focus on the waste minimisation element which will need careful consideration of a range of approaches and options, some of which have already been discussed. These will include aspects of material selection, product design and packaging which London's authorities can influence by strategic approaches to procurement as well as through targeted collective action such as has been achieved with the campaign on single use shopping bags. It will also involve a more challenging approach to 'polluter pays', ensuring producers and consumers who choose to consume 'high waste generating products' or 'difficult to recycle plastics' are made to pay the true cost of these products.
74. Ultimately, waste authorities will need to be involved in some agreement on a residual waste target for London's waste authorities and residents to work towards. Twenty-one of London's waste authorities have signed up to LAA targets for NI192 – percentage of household waste sent for reuse, recycling and composting. Ten have agreed NI191 (residual household waste per household) as a priority. What is required to really drive this issue however is information on the feasible levels and targets for London to work towards in driving down residual household or municipal waste per head. The region of Flanders in Belgium has set a target for the amount of residual waste produced per capita per year to be reduced to 150kg. For London, the figure for 2006/07 was 335kg. There is therefore much room for improvement although this will require a mix of approaches which require leadership that London can provide but which might also need government action and legislation.

#### London Waste and Recycling Board and Fund

75. It is still too early in the life of the new London Waste and Recycling Board (LWaRB) to be clear how its aspirations for its Fund will enhance the opportunities for improved performance across London's waste services. The LWaRB is yet to set out its strategic priorities but will be doing this before the Mayor's revised municipal waste management strategy is released for consultation.
76. London Councils is pleased to see that one of the interim priorities identified by the Board is the issue of awareness raising and communications through the funding agreement for 'Recycle for London'. London Councils is keen to see a consistent approach to communications across the region on the opportunities for, and benefits of sustainable waste management options – minimisation, reuse and recycling and the services that boroughs provide. There are instances in individual boroughs where intensive communications exercises have been very effective. However, these have also been very costly to carry out. It is important that the operational service can be matched with promotion and education which should be targeted both at residents and businesses.
77. The Fund available to the Board is money that belongs to boroughs. London Councils would like to see the Board's funding go towards strategic priorities consistent with this *Position Statement* as this will be crucial for enlisting borough support and for effective delivery on the ground.

## **APPENDIX 2**

### **Technical Paper to the London Councils TEC Sub-Group on the MMWMS**

#### **London Recycling Performance 2003/04 to 2006/07**

##### **Introduction**

London Boroughs have seen year on year improvement in waste management performance such as in recycling and composting since 2003/04. However, London as a whole is still outperformed by the rest of the country.

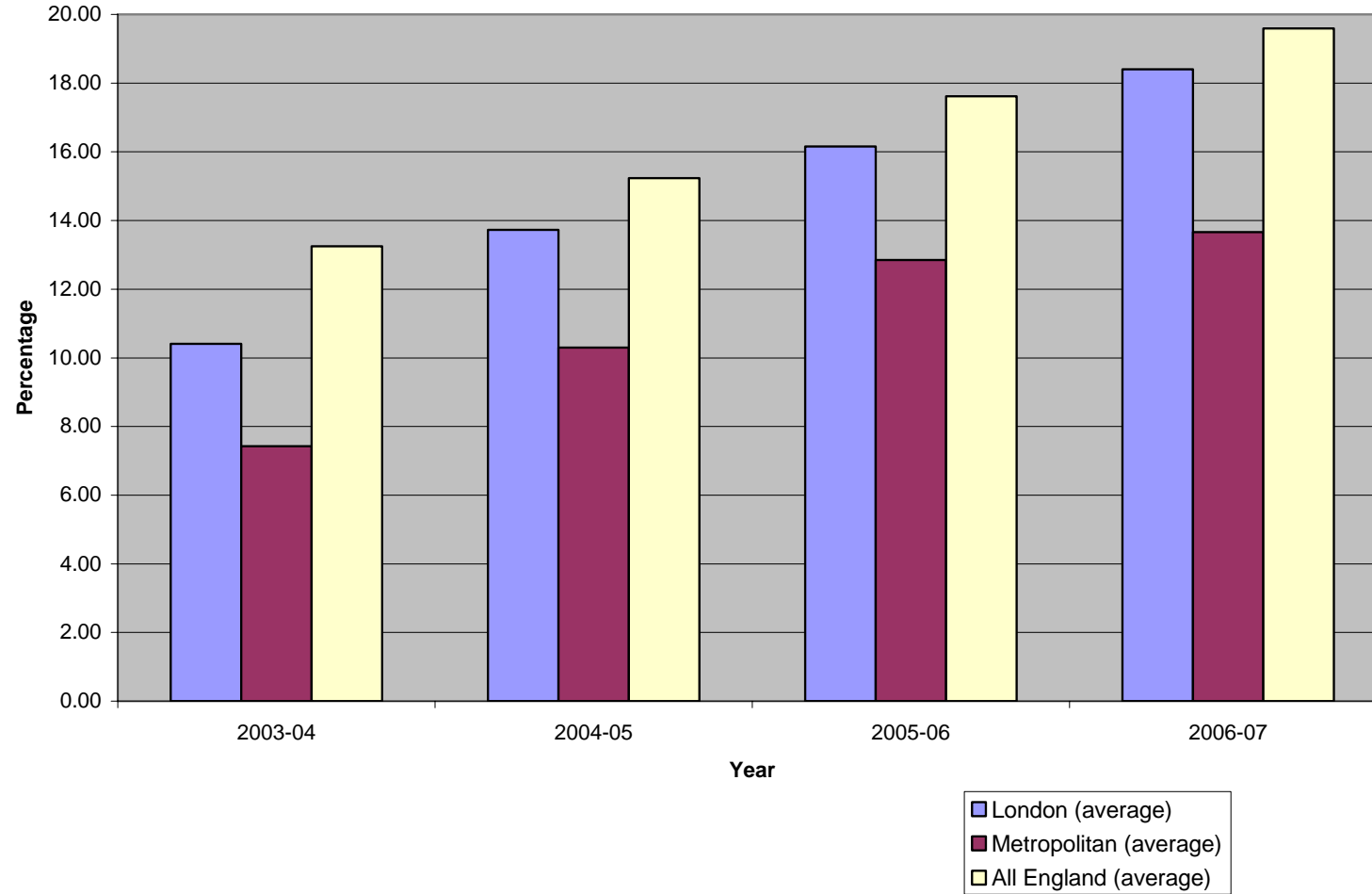
The best performing authorities, Bexley, Bromley, Richmond, Hillingdon and Sutton are some of the best performers in the country, especially on dry recycling.

The tables and charts below set out household waste recycling and composting performance and compares London's performance with English metropolitan authorities and with the all-England averages.

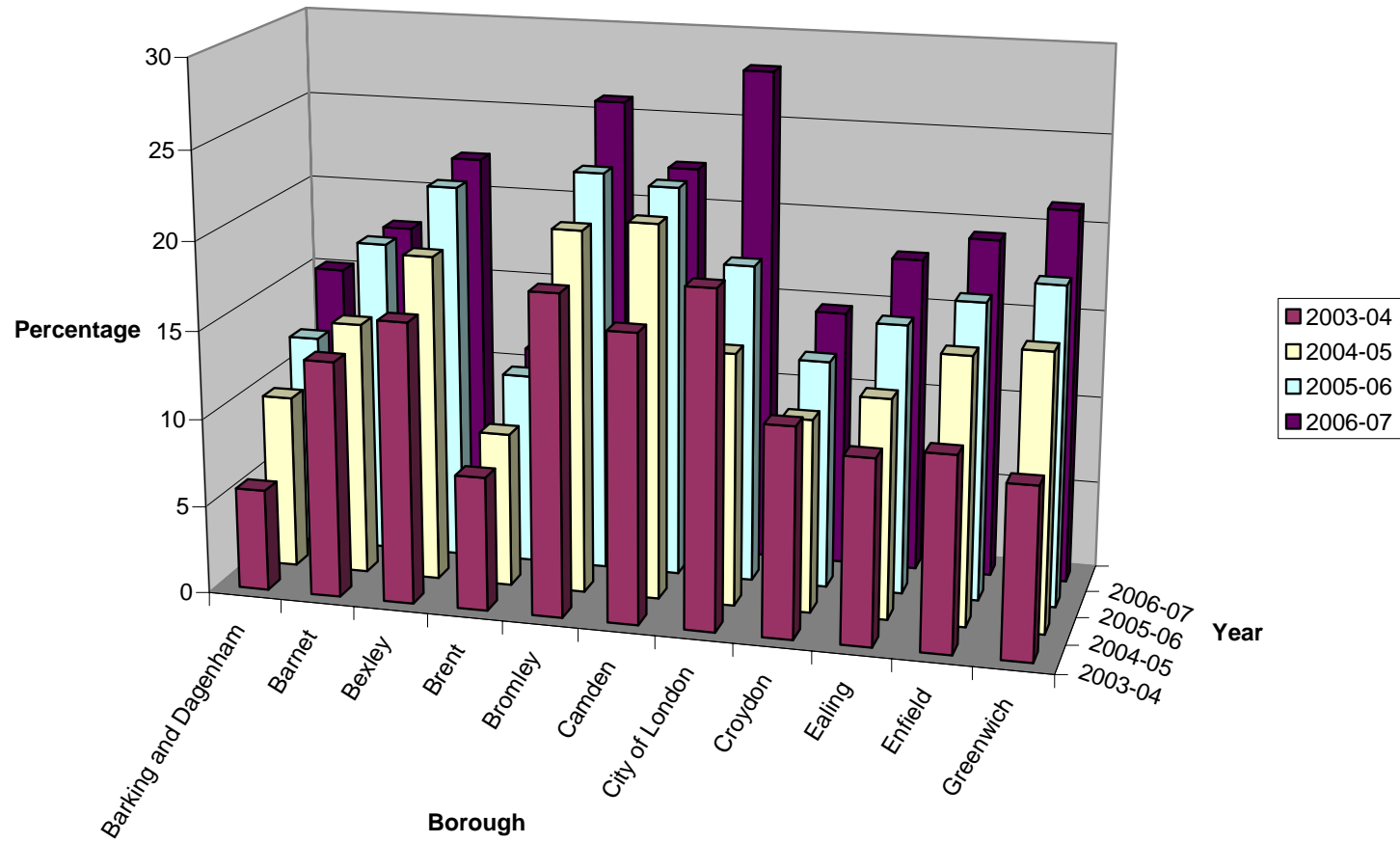
**BVPI 82ai – Percentage of Household Waste Recycled**

	<b>2003-04</b>	<b>2004-05</b>	<b>2005-06</b>	<b>2006-07</b>
Barking and Dagenham	5.77	9.86	12.18	15.18
Barnet	13.45	14.42	17.98	17.92
Bexley	15.96	18.55	21.50	22.21
Brent	7.6	8.75	10.89	11.25
Bromley	18.15	20.55	22.79	25.96
Camden	16.3	21.18	22.24	22.38
Corporation of London	19	14.30	18.10	28.10
Croydon	11.85	10.94	12.99	14.63
Ealing	10.47	12.44	15.36	17.97
Enfield	11	15.12	16.92	19.36
Greenwich	9.7	15.67	18.16	21.28
Hackney	5.84	9.64	11.84	14.00
Hammersmith and Fulham	14.39	19.04	21.00	22.74
Haringey	8.58	12.87	16.08	19.35
Harrow	10.41	12.70	13.66	14.70
Havering	7.54	9.94	11.85	13.48
Hillingdon	13.89	14.90	16.30	18.56
Hounslow	14.2	14.60	15.74	15.70
Islington	7.62	10.33	15.70	18.85
Kensington and Chelsea	16.13	17.69	19.29	23.58
Kingston Upon Thames	13.8	13.35	17.41	18.37
Lambeth	10.17	14.83	18.96	20.54
Lewisham	8.2	9.98	11.96	15.49
Merton	13.02	17.37	19.35	21.33
Newham	5.51	5.52	8.63	11.76
Redbridge	9.57	11.48	12.79	13.63
Richmond	17.64	17.91	21.06	22.78
Southwark	6.65	8.77	11.55	14.28
Sutton	18.85	19.29	20.21	20.81
Tower Hamlets	5.09	7.35	8.85	11.64
Waltham Forest	9.55	11.40	13.44	17.23
Wandsworth	17.3	16.97	20.63	22.60
Westminster	13.1	15.20	17.79	19.57
<b>London Average</b>	<b>10.41</b>	<b>13.72</b>	<b>16.16</b>	<b>18.40</b>
<b>Metropolitan Average</b>	<b>7.43</b>	<b>10.30</b>	<b>12.85</b>	<b>13.66</b>
<b>All England Average</b>	<b>13.24</b>	<b>15.23</b>	<b>17.61</b>	<b>19.59</b>

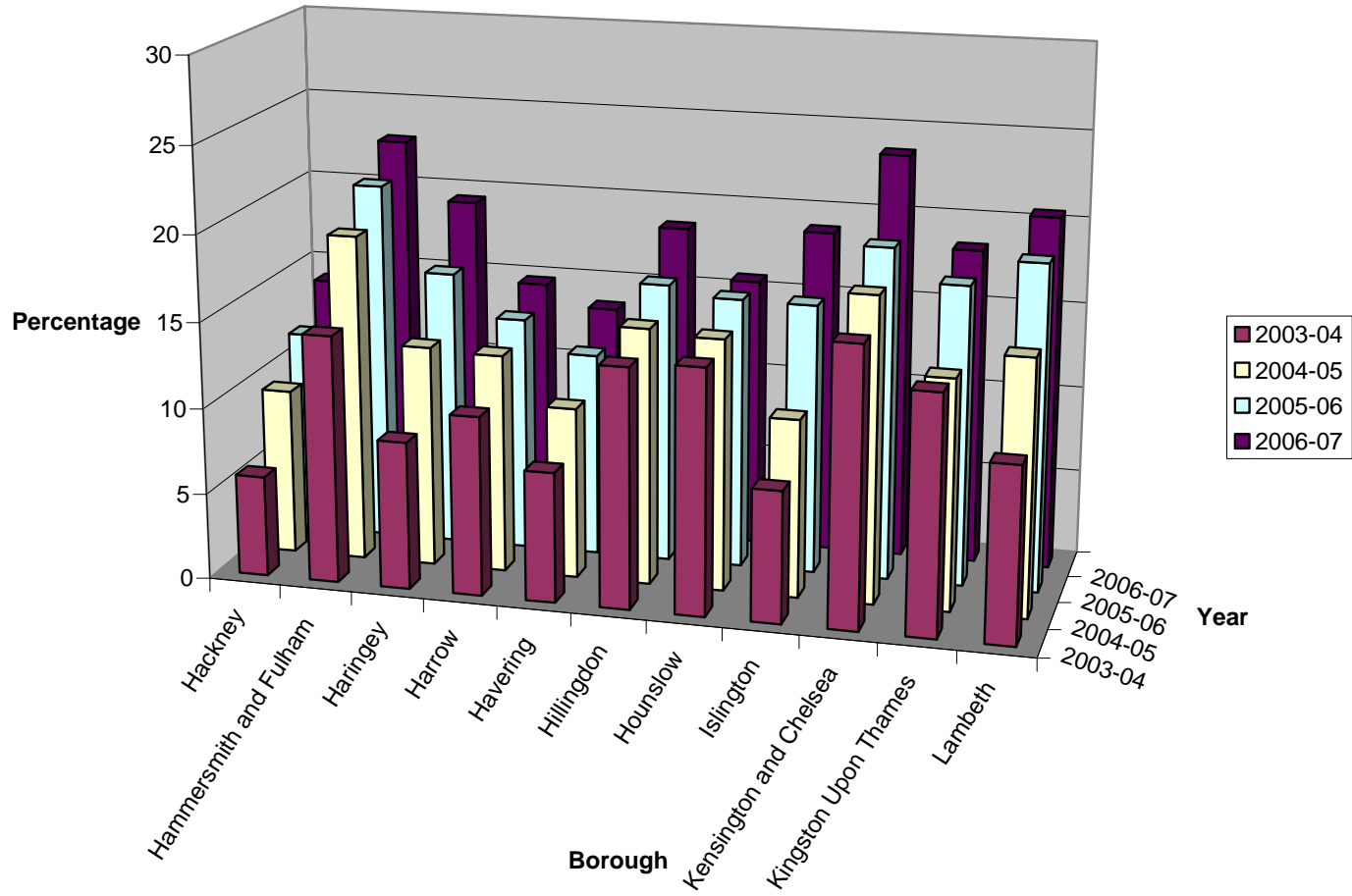
**Percentage Household Waste Recycled (BVPI 82a (i))  
London Average, Metropolitan, All England year on year comparison**



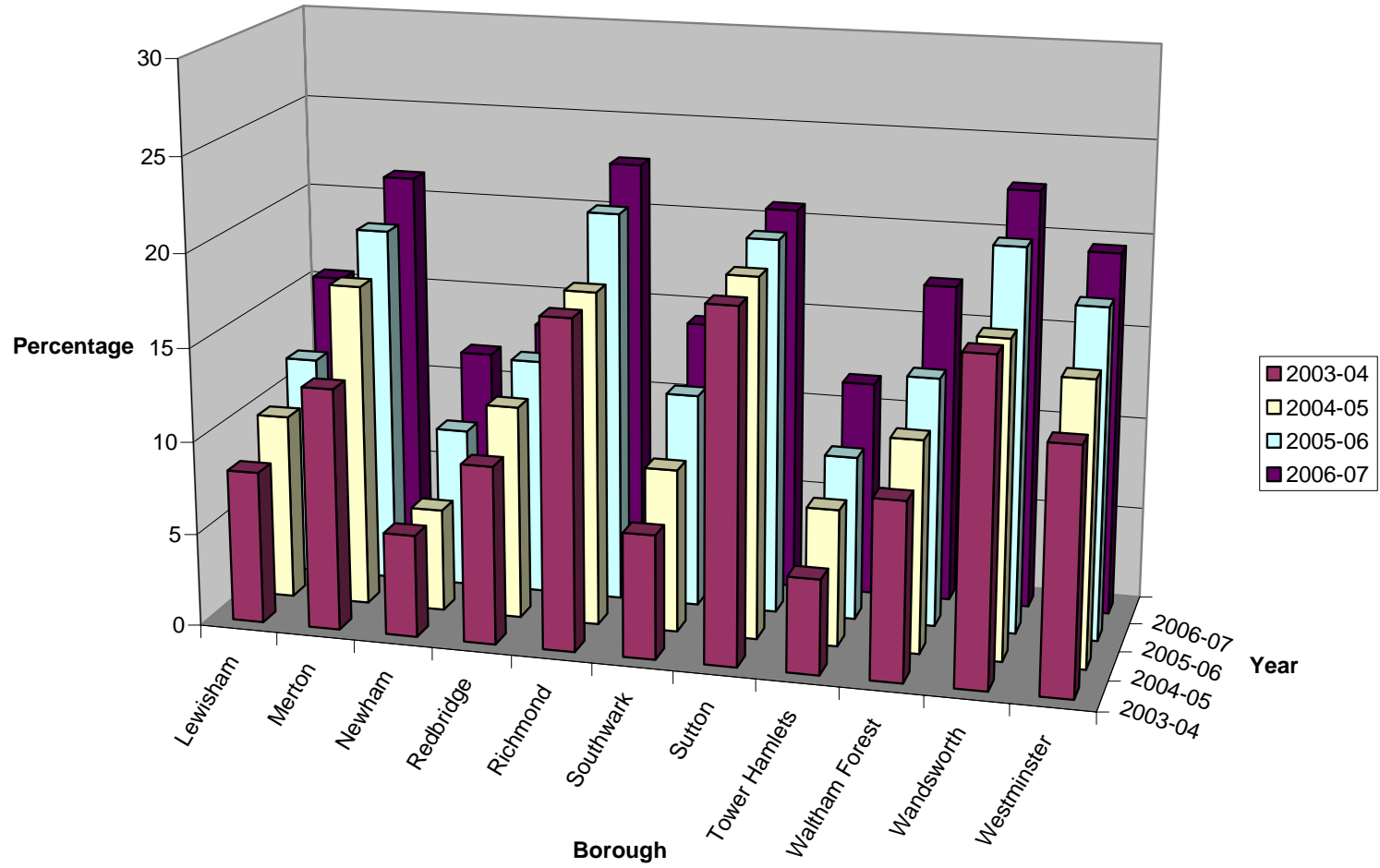
Percentage Household Waste Recycled by Borough (2003/04 to 2006/07) - Graph 1



Percentage Household Waste Recycled by Borough (2003/04 to 2006/07) - Graph 2



Percentage Household Waste Recycled by Borough (2003/04 to 2006/07) - Graph 3

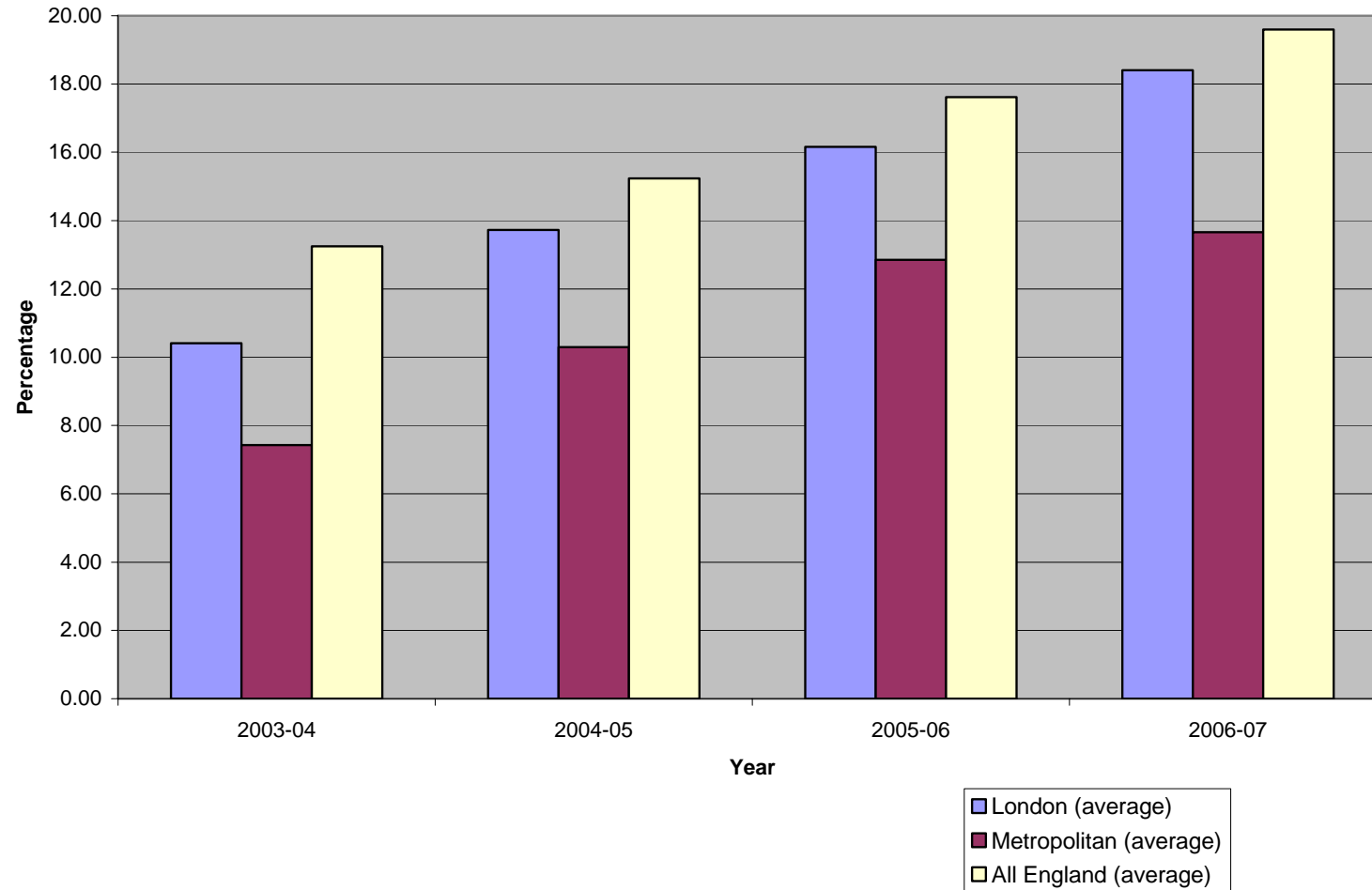


**BVPI 82bi – Percentage of Household Waste Composted**

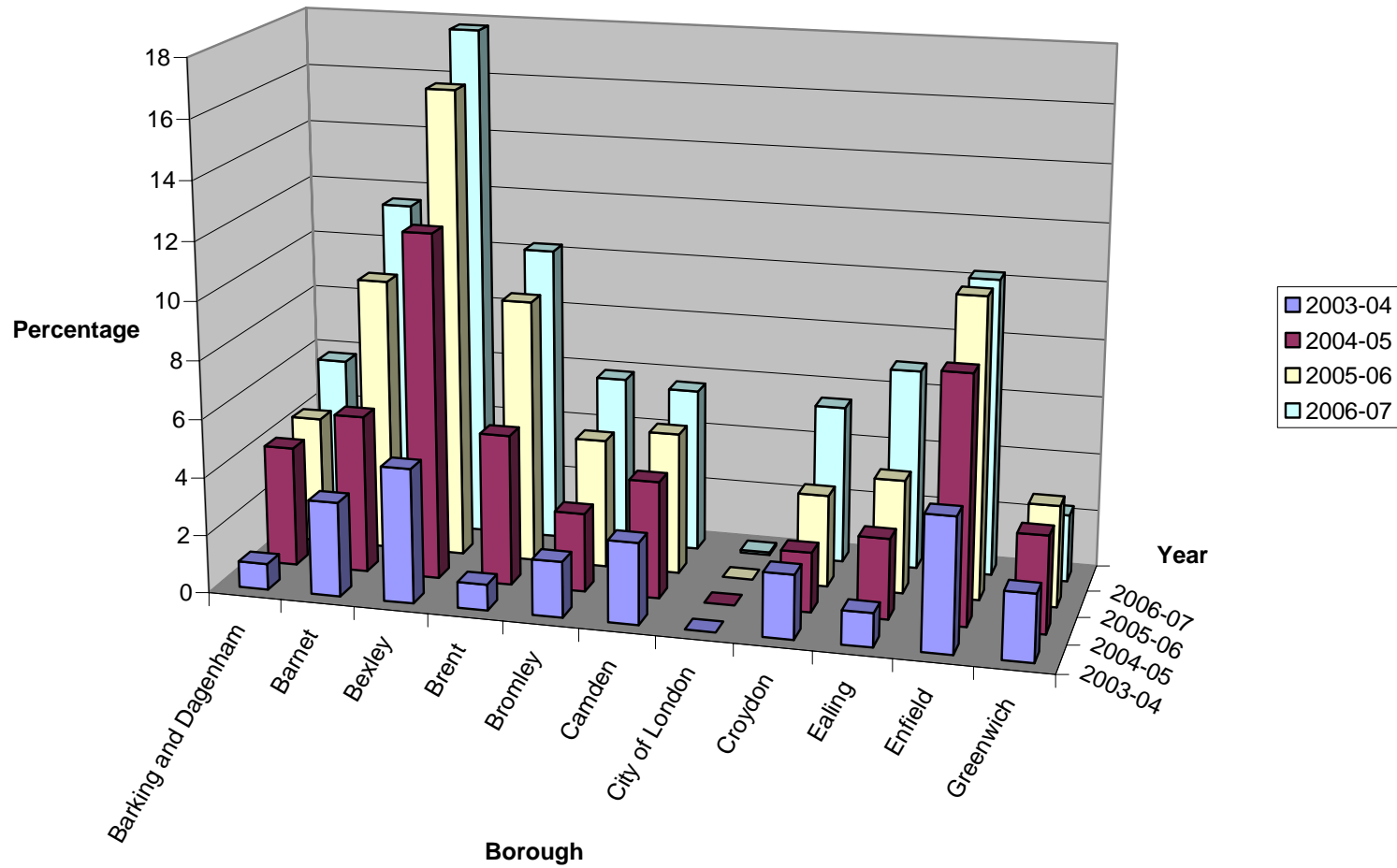
	<b>2003-04</b>	<b>2004-05</b>	<b>2005-06</b>	<b>2006-07</b>
Barking and Dagenham	0.9	4.14	4.42	5.79
Barnet	3.26	5.45	9.49	11.55
Bexley	4.64	11.92	16.21	17.79
Brent	0.9	5.20	9.12	10.27
Bromley	1.92	2.71	4.46	5.89
Camden	2.8	4.03	4.90	5.67
Corporation of London	0	0.00	0.00	0.09
Croydon	2.2	2.06	3.18	5.48
Ealing	1.16	2.77	3.92	6.95
Enfield	4.6	8.51	10.37	10.28
Greenwich	2.3	3.34	3.50	2.33
Hackney	1.09	2.56	4.37	5.57
Hammersmith and Fulham	0.89	0.55	0.49	0.89
Haringey	0.16	1.47	3.15	5.37
Harrow	2.7	6.10	13.04	13.00
Havering	2.05	5.57	5.96	6.95
Hillingdon	9.96	12.30	11.40	12.08
Hounslow	1.5	2.80	3.51	3.92
Islington	0.49	0.71	2.59	4.65
Kensington and Chelsea	0.34	0.39	0.65	0.70
Kingston Upon Thames	4.74	4.90	6.56	5.53
Lambeth	0.34	1.63	3.19	2.56
Lewisham	0.2	0.22	0.24	0.26
Merton	1.79	2.92	3.24	3.72
Newham	0	0.71	1.50	1.82
Redbridge	2.66	4.06	4.55	4.97
Richmond	4.4	5.89	7.53	8.93
Southwark	0.43	2.07	3.41	4.18
Sutton	6.57	8.57	8.86	9.45
Tower Hamlets	0	0.00	0.00	0.11
Waltham Forest	2.16	6.74	8.41	10.28
Wandsworth	0.18	0.18	0.33	0.27
Westminster	0.1	0.10	0.50	0.81

<b>London Average</b>	<b>2.04</b>	<b>3.65</b>	<b>4.94</b>	<b>5.70</b>
<b>Metropolitan Average</b>	<b>1.79</b>	<b>3.55</b>	<b>6.98</b>	<b>8.81</b>
<b>All England Average</b>	<b>3.93</b>	<b>6.48</b>	<b>8.95</b>	<b>10.91</b>

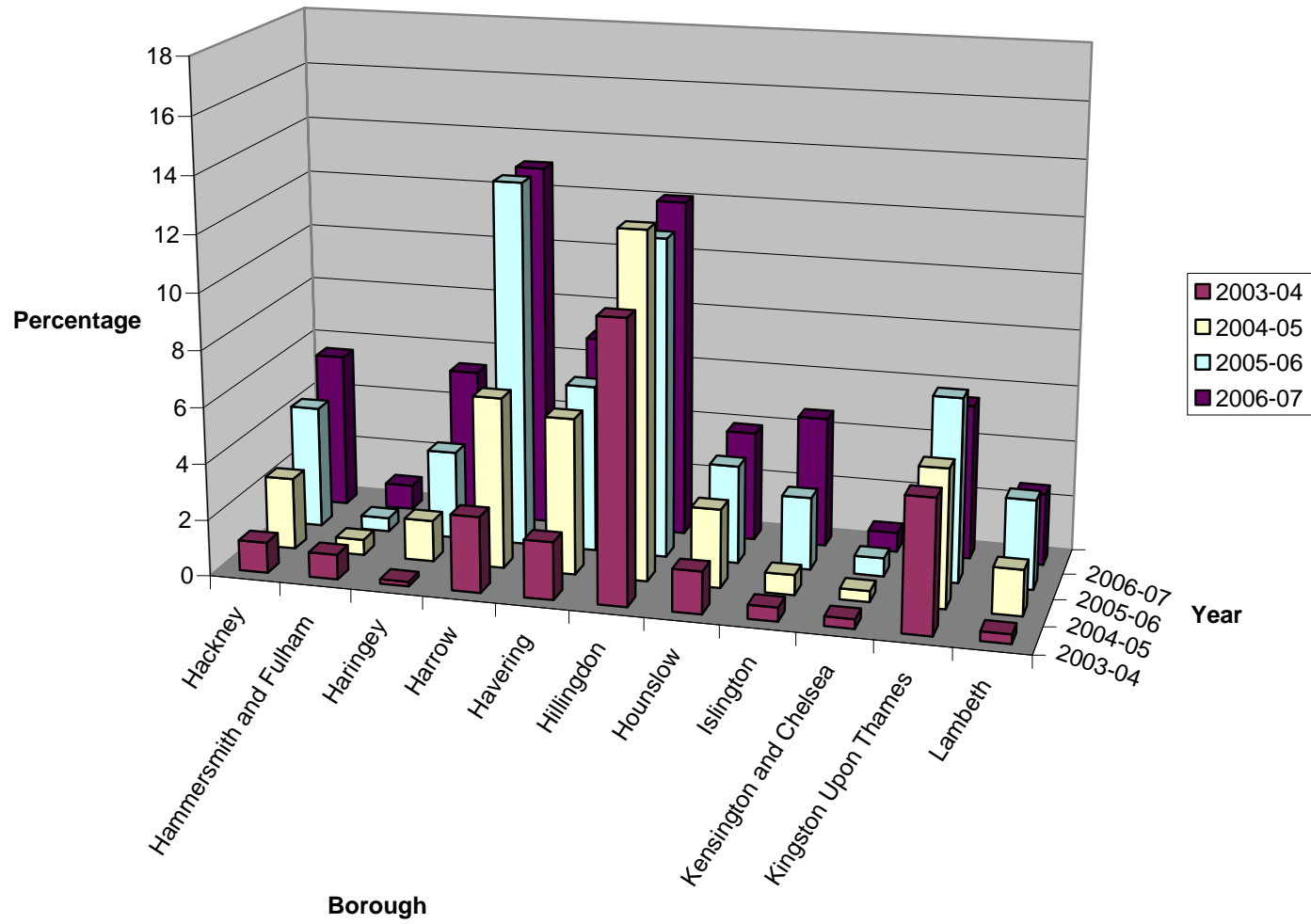
**Percentage Household Waste Recycled (BVPI 82a (i))**  
**London Average, Metropolitan, All England year on year comparison**



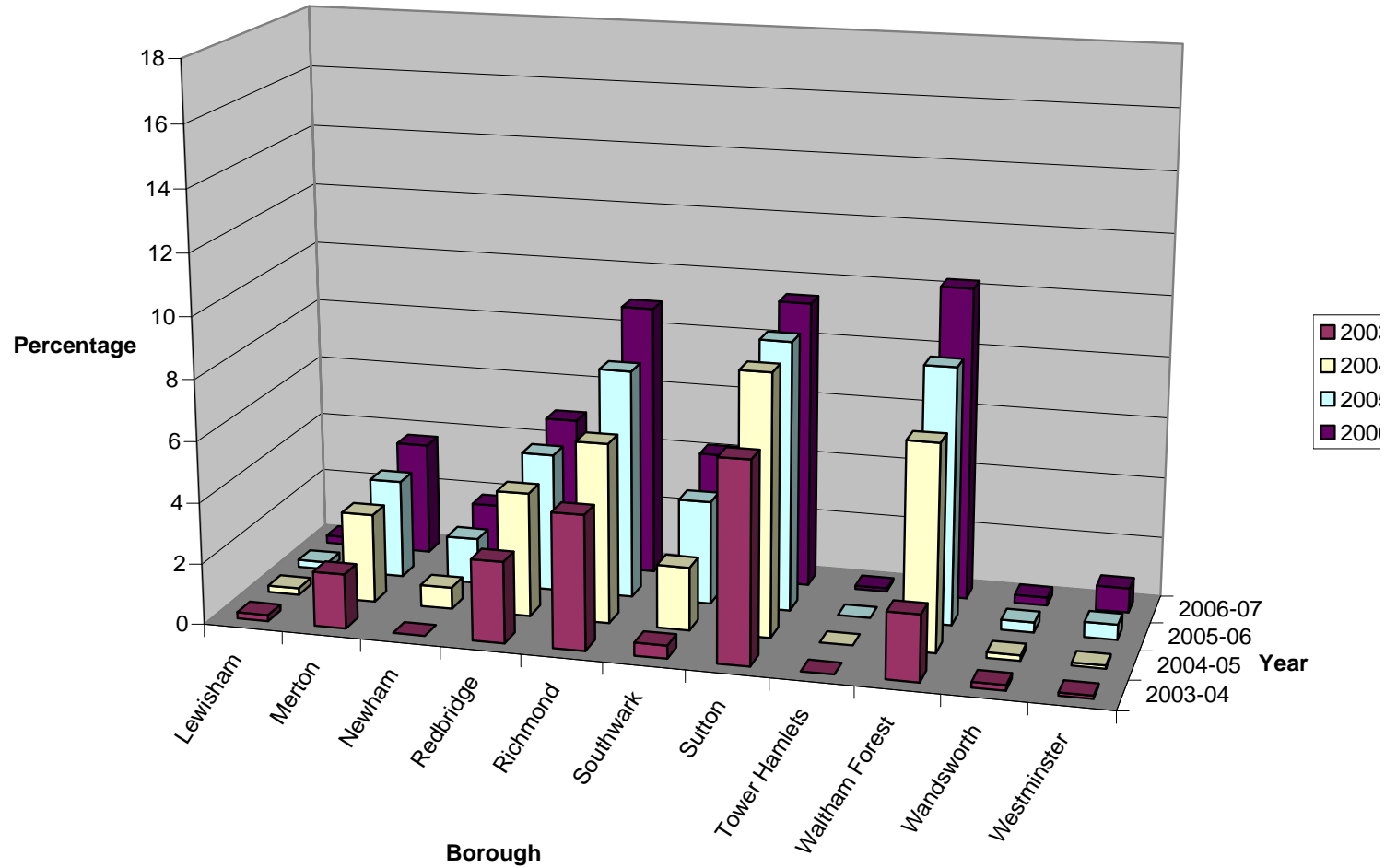
Percentage Household Waste Composted By Borough (2003/04 to 2006/07) - Graph 1



Percentage Household Waste Composted by Borough (2003//04 to 2006/07) - Graph 2



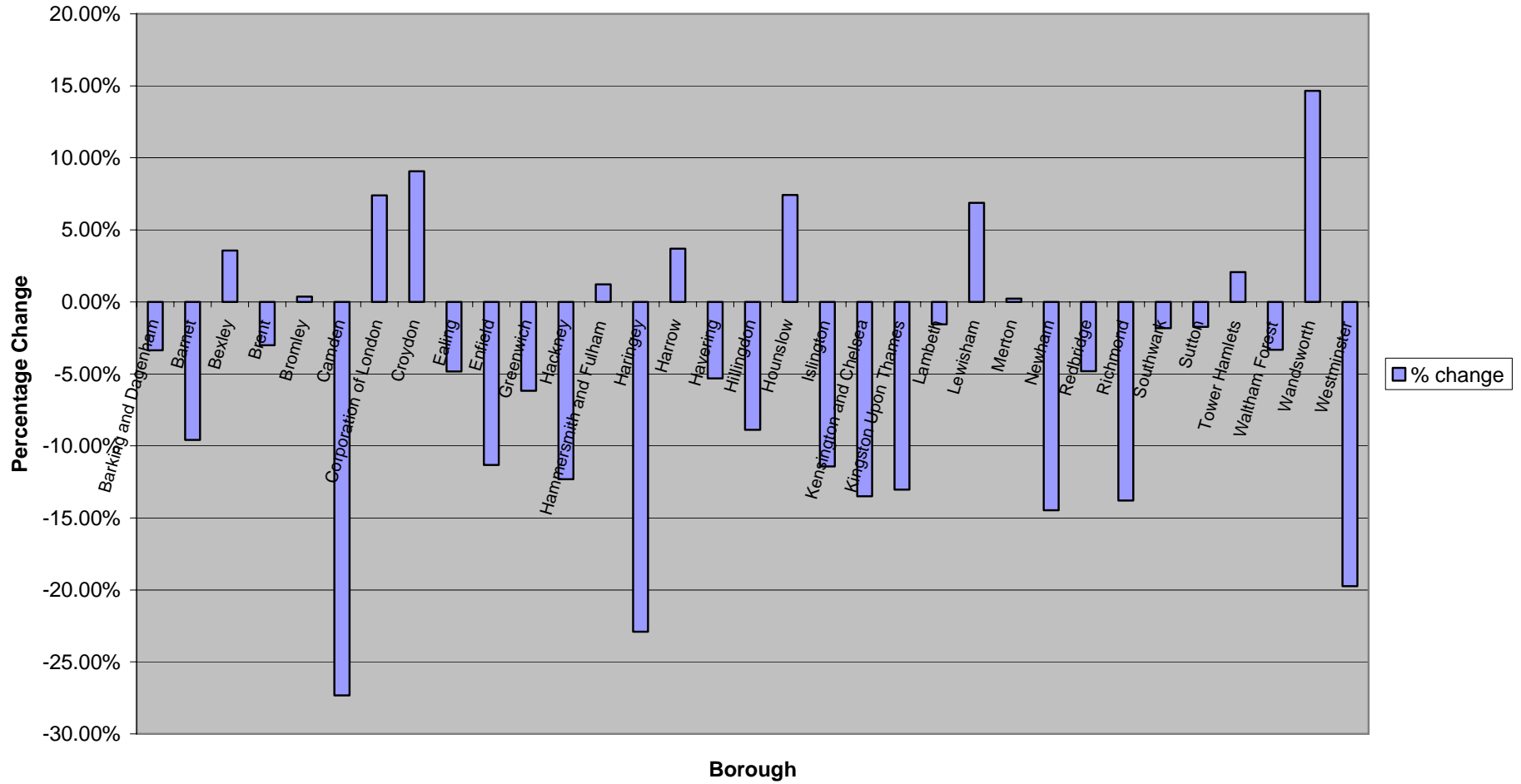
Percentage Household Waste Composted by Borough (2003/04 to 2006/07) - Graph 3



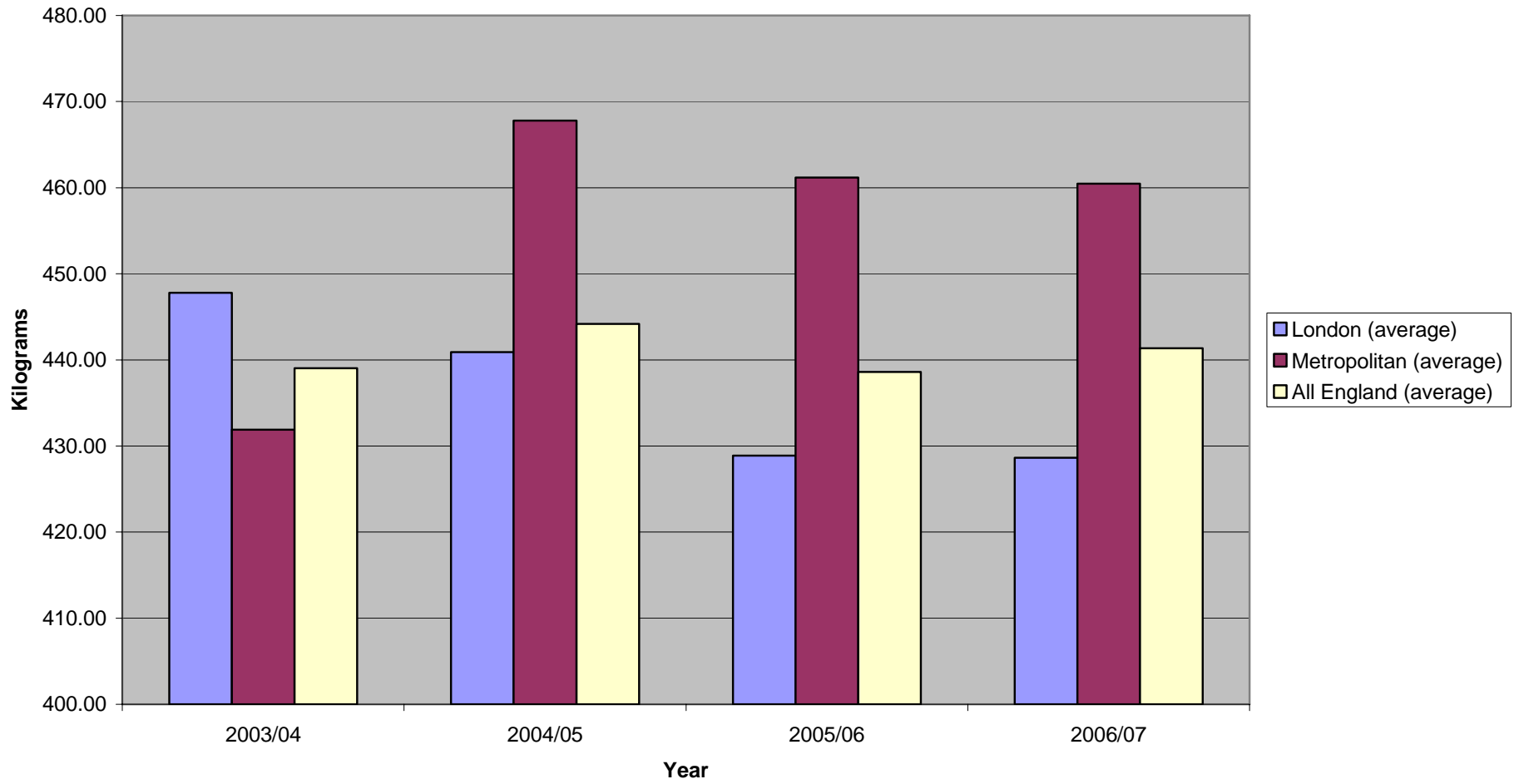
**BVPI 84a**  
**Kilograms of Household Waste Collected Per Head and**  
**Percentage Change 2003/04 to 2007/08**

	2003-04	2004-05	2005-06	2006-07	% change
Barking and Dagenham	542.4	543.4	524.2	524.2	-3.36%
Barnet	477.4	471.3	432.8	431.6	-9.59%
Bexley	490	503.0	497.0	507.5	3.57%
Brent	424	438.5	412.0	411.2	-3.02%
Bromley	496.6	500.7	506.0	498.4	0.36%
Camden	461	396.7	348.1	335.0	-27.33%
Corporation of London	531	413.3	549.3	570.2	7.38%
Croydon	373	438.0	411.0	406.8	9.06%
Ealing	424.6	444.9	411.2	404.1	-4.83%
Enfield	461.3	468.4	410.0	409.1	-11.32%
Greenwich	488.3	465.7	466.5	458.1	-6.18%
Hackney	450	353.7	369.2	394.6	-12.31%
Hammersmith and Fulham	335.6	352.3	340.1	339.7	1.22%
Haringey	443	354.2	359.5	341.5	-22.91%
Harrow	460	501.0	484.0	477.0	3.70%
Havering	546.8	515.5	491.8	517.8	-5.30%
Hillingdon	539.8	528.2	515.4	491.9	-8.87%
Hounslow	465	501.0	495.8	499.5	7.42%
Islington	489.2	433.8	424.3	433.3	-11.43%
Kensington and Chelsea	358.5	340.8	330.5	310.1	-13.50%
Kingston Upon Thames	510.9	544.0	432.0	444.3	-13.04%
Lambeth	357.2	352.5	349.4	351.6	-1.57%
Lewisham	439.7	460.4	470.0	469.9	6.87%
Merton	385.7	396.2	386.2	386.6	0.23%
Newham	524.5	466.5	437.2	448.6	-14.47%
Redbridge	438.2	436.7	417.4	417.1	-4.82%
Richmond	501	489.0	470.0	431.9	-13.79%
Southwark	434.9	408.2	420.0	427.0	-1.82%
Sutton	473	478.0	456.2	464.8	-1.73%
Tower Hamlets	388.4	379.4	377.8	396.4	2.06%
Waltham Forest	460.3	440.1	436.4	445.0	-3.32%
Wandsworth	319.2	371.5	364.0	366.0	14.66%
Westminster	417	363.0	357.9	334.7	-19.74%
<b>London (average)</b>	<b>447.80</b>	<b>440.9</b>	<b>428.9</b>	<b>428.7</b>	<b>-4.28%</b>
<b>Metropolitan (average)</b>	<b>431.90</b>	<b>467.8</b>	<b>461.2</b>	<b>460.5</b>	<b>6.62%</b>
<b>All England (average)</b>	<b>439.1</b>	<b>444.2</b>	<b>438.6</b>	<b>441.3</b>	<b>0.52%</b>

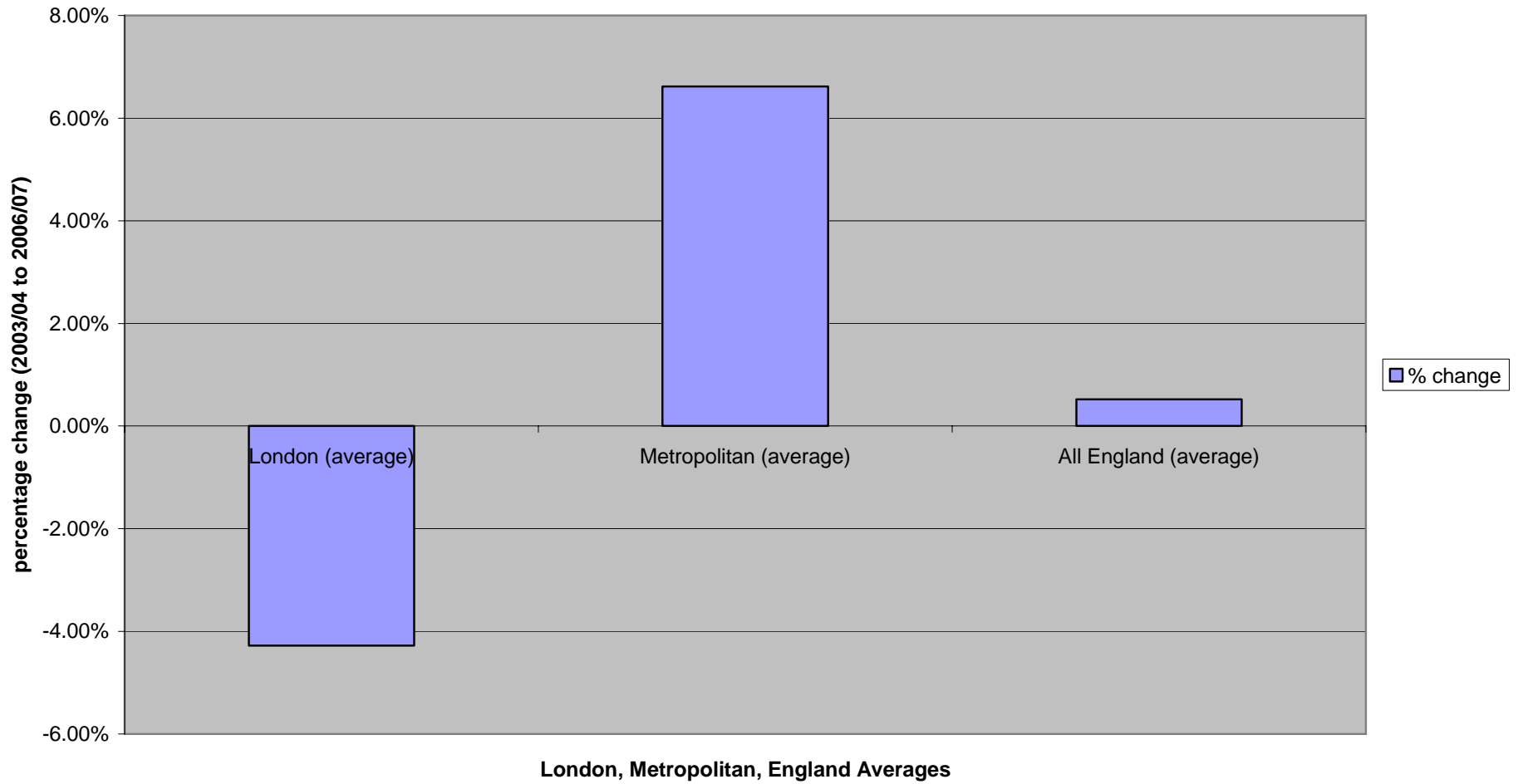
## Percentage Change in Kilograms of Household Waste Collected Per Head 2003/04 to 2006/07



**Kilograms of Household Waste Collected Per Head (2003/04 to 2006/07 - London, Metropolitan and All England Averages)**



**Percentage Change in Average Kilograms of Household Waste Collected Per Head  
2003/04 to 2006/07 - London, Metropolitan and All England**



## APPENDIX 3

### Technical Paper to the London Councils TEC Member Sub-Group on the MMWMS

#### Zero Waste to Landfill and 100% Recycling Scenarios for London

##### **Introduction**

The Waste Strategy for England has set targets for recycling and composting of household waste at 40% by 2010, 45% by 2015 and 50% by 2020. The revised EU Framework Directive has also adopted the 2020 target at 50% of waste by weight. The subtext is that recycling waste is only environmentally efficient up to a point, after which recycling becomes as energy intensive as production. However, there is a growing body of evidence that recycling beyond these percentages is possible if recycling is made easier. Improved resource efficiency actually opens up a number of opportunities for waste authorities, businesses and residents.

##### **100% recycling**

Recycling, i.e. conversion of waste products into new materials is no longer generally seen as a 'choice' but an environmental and economic necessity. This is because to a large extent, the benefits (such as lower raw material consumption, reduced disposal costs, reduced energy consumption in manufacturing) generally outweigh the costs (such as the need for collection and treatment, need for high quality products that can be recycled, and costs of energy for reprocessing).

##### **Recycling Facts**

- *Recycling a ton of paper forgoes the felling of 17 trees, and saves two barrels of oil (enough to run the average car for 1,260 miles), 4,100 kilowatts of energy (enough power for the average home for six months), 3.2 cubic yards of landfill space and prevents 60 pounds of air pollution.*
- *Americans throw away enough aluminium to rebuild our entire commercial fleet of airplanes every three months.*
- *Recycling creates six times as many jobs as landfilling.*
- *Recycling glass instead of making it from silica sand reduces mining waste by 70 percent, water use by 50 percent and air pollution by 20 percent.*
- *Recycling just one aluminium can saves enough energy to operate a TV for three hours.*
- *The energy saved each year by steel recycling is equal to the electrical power used by 18 million homes each year — or enough energy to last Los Angeles residents for eight years.*
- *If every U.S. household replaced just one roll of 1,000-sheet virgin fibre bathroom tissues with 100 percent recycled ones, it could save 373,000 trees, 1.48 million cubic feet of landfill space and 155 million gallons of water.*

*Sources: Eco-Cycle, Environmental Defence Fund, Colorado Recycles, Steel Recycling Institute, Seventh Generation Co.*

The concept of 100% recycling makes a number of assumptions in terms of delivery. 'Integrated Product Policies' aim to influence the environmental impacts of products throughout their whole life cycle by taking account of impacts of production, potential for recycling, energy use in consumption and the consequences of disposal. Another approach is 'closed loop' recycling i.e. returning materials back to their original use such as producing plastic bottles from waste plastic bottles or waste food back to the soil as compost. Other concepts such as 'cradle-to-cradle' have been suggested, all aimed at maximising recycling. However, it is generally agreed that the real strategic objective of these policies and concepts where applied, has been to significantly boost recycling rather than to achieve 100% recycling which may be possible for all waste streams but will certainly be so expensive for particular materials and wastes as to make it impractical.

### ***Recycling – the pros and cons<sup>7</sup>***

There are a number of issues to consider when considering the viability of 100% recycling. Research on maximising recycling rates in the UK has identified the level that could be achieved with good practice as about 62%. More recent research taking in international scenarios concluded that up to 71% could be achieved. Even more recently, the Japanese town of Kamikatsu has managed to raise recycling rates from 55% five years ago to a current rate of 80%, but this has been achieved via labour intensive means: a 34-stream separation system.

Recycling of certain materials results in greater benefits than recycling of others. In particular, metal recycling produces large energy benefits. On the other hand, glass recycling is almost as energy intensive as production. Recycling plastic saves energy in the forms of oil and gas and is therefore desirable. Effective paper recycling requires the separation of paper and card and the further separation of the paper into quality grades. Newsprint recycling saves trees and fossil fuels while recycling brown paper, brown paper bags and brown paper packaging appears to save little energy.

To achieve high recycling levels, effort is needed to overcome technical and institutional barriers. High recycling rates require excellent source separation for kerbside collection or super efficient materials recovery facilities (MRFs) for separation and baling. Further, clean and easy to handle waste products are probably already being recovered. Therefore, declines in material quality, increased recovery costs and increased energy use will likely accompany an increase in recovery rates beyond an optimal level.

It is clear from the foregoing that the optimal recycling rate is not the same for every material. Many factors, such as the availability of raw materials for manufacturing, potential for other forms of resource recovery and space available for final disposal to landfill all come into play when assessing cost/benefit. Glass, for example, has a small energy benefit from recycling as does brown paper. On the other end of the spectrum, aluminium generates more than half of the energy benefits from recycling even though it makes up only a small portion of the total waste stream. Aluminium and plastics provide the largest energy benefit. Reuse, which may be the best management option for many plastics and glass containers, is often overlooked. Also, the limitations of public awareness and participation are not fully considered before scheme benefits are assessed.

### ***Recycling 100% of specific waste streams***

This is the model that has been successful in other countries around Europe and elsewhere. Switzerland is one of the top recyclers in the world with a recycling rate of 76% for all currently recyclable items (national target is 75%) and this success has been built on separate collection of priority waste streams as part of a 17-stream separation system. In 2006, the Swiss recycled:

- 95% of glass
- 91% of aluminium cans
- 80% of tin cans
- 77% of paper and card
- 76% of PET plastic, and
- 66% of batteries

In England, Defra have now started to develop more detailed policy around priority waste materials. The Waste Strategy for England (2007) sets out seven priority materials where action should be targeted to increase resource efficiency. These are textiles, plastics, paper/card, glass, wood, and aluminium and food/garden waste. These priority waste materials were identified on potential reductions of greenhouse gas emissions resulting from diversion from landfill and increased recycling and recovery.

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<sup>7</sup> Significant reproduction from Garcia, Nicolas. Greenhouse Gas Mitigation Options for Washington State.

Recent press articles have highlighted the increasing value of discarded waste materials such as plastics and metals. In the United States, an industry has sprung up around 'landfill mining' to dig out valuable materials from landfill sites as commodity prices soar in response to worldwide demand. The sharply rising prices give councils an added incentive to boost recycling, and this could be one of the stronger drivers for increased recycling performance but only where the additional income can be shared by the waste authorities putting the investment in to expand their collection services.

### ***Policy measures for London***

Some of the approaches discussed above are unworkable in London. Multiple stream (more than 4 or 5 separate containers) separation for collection will be impossible in many parts of London due to housing types and other limitations. However, there is an opportunity for new thinking about how waste authorities can jointly deliver significantly higher rates of recycling and work towards a 'zero waste to landfill' resource recovery model.

A variety of policy instruments are required and London can lead the way, with boroughs working collaboratively with the Mayor to put in place the right framework conditions in the region. Options include:

- Legislative framework – this could include extended producer responsibility requirements, increasing mandatory recycling targets for packaging, and more intelligent long-term targets for recycling set in the London Plan or the municipal waste management strategy which will also have the effect of stimulating market investments;
- Economic instruments – could include workable incentives for re-use and recycling and increased pressure on 'incentives' for disposal;
- Systems – the key here could be increased roll-out of multi-stream separation bring facilities in accessible locations (all councils buildings including schools, all supermarkets, etc) across the region;
- Market development – such as quality specification for recyclable and recycled products; and stringent public sector procurement policies to support market development;
- Information and awareness raising – to provide consistent messaging across the region;
- Public and private sector investments – in research and development, new infrastructure, maintenance of existing infrastructure, and incentivising upstream waste management options

All of these options are feasible. However more work is required to set out the detailed approaches under these scenarios that would best work in London.

## APPENDIX 4

### Technical Paper to the London Councils TEC Member Sub-Group on the MMWMS

#### Waste Incineration and Waste to Landfill

##### Background

The purpose of this paper is to compare two practices for managing biodegradable municipal waste already used and recognised within the UK, namely, landfill and incineration with energy recovery. The paper sets out the legislative and policy framework for managing biodegradable municipal waste in the UK and in London.

##### Legislative Framework

###### National

- Landfill Allowance Trading Scheme (LATS)

The Landfill Allowance Trading Scheme (LATS) introduces significant and innovative changes in waste policy and practice for the diversion of biodegradable municipal waste from landfill. Introduced in 2005/06 it is intended to provide a cost effective way of enabling England to meet its targets for reducing the landfilling of biodegradable municipal waste under Article 5(2) of the EC Landfill Directive.

The Directive's overall aim is "to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole life-cycle of the landfill".

The Landfill Directive is implemented into UK legislation through the Waste and Emissions Trading Act (2003) which provides the legal framework for the LATS and for the allocation of tradable landfill allowances to each waste disposal authority in England. These allowances convey the right for a waste disposal authority to landfill a certain amount of biodegradable municipal waste in a specified scheme year.

Each waste disposal authority in England has been given an allowance of the amount of waste it can send to landfill, and the total allowances equate to the contribution England must make to achieve the UK's diversion obligations.

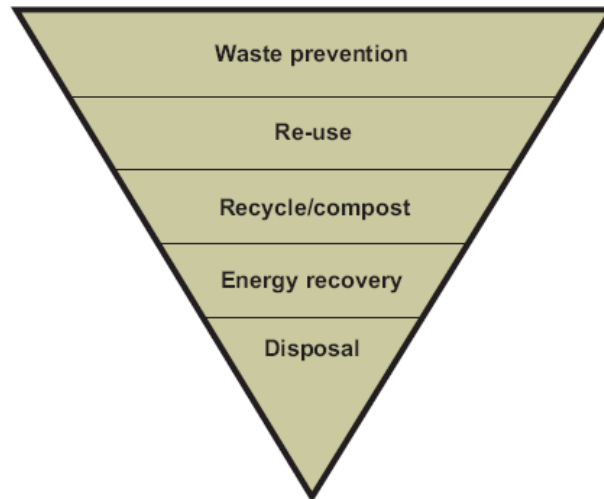
Authorities must ensure they hold sufficient allowances to cover the actual amount of biodegradable municipal waste they send to landfill in a financial year. Authorities that do not require all of their allowances because of actual or planned diversion from landfill are able to sell their excess allowances or bank them into the following year (other than in target years of 2009/10, 2012/13 and 2019/20). Authorities that do not hold enough allowances for the amount of waste it will landfill must either increase the amount of waste they divert from landfill, purchase excess allowances from another authority or borrow permits (up to five per cent) from their next year's allocation.

The LATS scheme came into effect in 2005/06. Allocations will get progressively harder to achieve over the course of the scheme, as the diversion requirements for the Landfill Directive become more challenging.

- Waste Strategy

In 2007 the Government published its revised national waste strategy - the first revision since the waste strategy 2000.

The strategy continues to place a heavy emphasis on the implementation of the recognised waste hierarchy:



- ❖ the most effective environmental solution is often to reduce the generation of waste – prevention
- ❖ products and materials can sometimes be used again, for the same or different purpose re-use
- ❖ resources can often be recovered from waste – recycle or compost
- ❖ value can also be recovered by generating energy from waste – energy recovery
- ❖ only if none of the above offer an appropriate solution should waste be disposed of

Source: Defra, National Waste Strategy (2007)

The strategy set out the Government's Key objectives, for the management of waste:

- “decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use
- meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020
- increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste
- secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste
- get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies”<sup>8</sup>

## Regional

- Mayor's Municipal Waste Management Strategy

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<sup>8</sup> Defra, Waste, Waste Strategy for England 2007

The Greater London Authority Act 1999 (as amended) requires the Mayor to prepare a Municipal Waste Management Strategy and London's waste authorities to act in general conformity with this Strategy.

The Mayor's Municipal Waste Management Strategy (MMWMS) was published by the Mayor in September 2003. The objective of the current strategy is to develop a "waste reduction, reuse and recycling-led, cohesive and sustainable strategy for the management of London's waste"<sup>9</sup>.

The Mayor sets a preferred option for the management of municipal waste. This option is called the balanced approach and avoids over reliance on any one management method. Municipal waste recycling is set at 35 per cent by 2010 and 45 per cent by 2015, avoiding the need for significant new capacity until 2013. There is a preference for "new and emerging technologies and new waste treatments"<sup>10</sup>.

In line with the 'Waste Hierarchy', the Greater London Authority set out the following top down hierarchy for waste management in London<sup>11</sup>:

- Reduce
- Re-use
- Recycle and Compost
- Recovery using new and emerging advanced thermal treatment (ATT) technologies
- Conventional incineration
- Landfill

The key difference between the Mayor's hierarchy for waste management and that of the National Waste Strategy is that nationally, the waste hierarchy pairs together landfill and incineration without energy recover as a least favoured option.

Although the strategy provides an overarching framework of policy for sustainable waste management in London until 2020, many of the policies and proposals focus on the period up to 2005/06.

- The London Plan

The vision for the Plan is to develop London as an exemplary, sustainable world city, based on three cross-cutting themes:

- strong, diverse long term economic growth;
- social inclusivity to give all Londoners the opportunity to share in London's future success; and,
- fundamental improvements in London's environment and use of resources.

The Spatial Development Strategy for London, known as the London Plan (consolidated with Alterations since 2004), was published in February 2008, and gives projected municipal and commercial/industrial waste arisings at borough level for key milestones through to 2020 it is therefore the most relevant document in setting out the regional waste management policy framework.

Chapter four of the London Plan formulates a number of waste related policies. Relevant policies and targets include:

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<sup>9</sup> GLA, 2003, "Rethinking Rubbish in London – The Mayor's Municipal Waste Management Strategy" (Page 86)

<sup>10</sup> Mayor of London, Municipal Waste Management Strategy, p.67

<sup>11</sup> Greater London Authority(2008), 'Rubbish In – Resources Out' referencing (2003), 'Rethinking Rubbish in London'

- Self-sufficiency: a target to ensure that facilities with sufficient capacity to manage 75 per cent (15.8 million tonnes) of waste arising within London are provided by 2010, rising to 80 per cent (19.2 million tonnes) by 2015 and 85 per cent (20.6 million tonnes) by 2020;
- Number and type of new or enhanced facilities;
- Apportionment: boroughs, in their development plan documents, are required to identify sufficient sites to meet the tonnages of municipal and commercial/industrial waste requiring management for their borough. Boroughs can pool their apportionment;
- Identify opportunities for the location of facilities and, where appropriate, criteria for the selection of sites;
- Wherever possible to include the provision of CHP<sup>12</sup> or CCHP<sup>13</sup>;
- Identify and safeguard existing heating and cooling networks;
- Boroughs are required to safeguard existing waste sites, unless appropriate compensatory provision is made;
- Where waste cannot be recycled to encourage the production of energy from waste using new and emerging technologies, especially where the products of waste treatment can be used as fuels; and,
- All developments make their fullest contribution to the mitigation of climate change and minimise carbon dioxide emissions.

- Boris Johnson's Manifesto

The following point from the Mayor's election manifesto are relevant to this paper:

- support the introduction of a Waste Heat Levy and the greater use of Combined Heat and Power in London to improve the efficiency of power generation; and,
- use all the powers available to push the use of renewable energy sources in London

## Conclusion

The Waste Strategy 2007 looks to meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste. In comparing the two options of landfill and conventional incineration (with energy recovery) for the management of biodegradable municipal waste, it can be reasoned that within the current policy framework, incineration does offer a mechanism for avoiding the high financial costs and potential European fines associated with landfill. LATs however, has been established to allow authorities some flexibility in continuing to utilise landfill capacity should this be a more cost effective solution in the immediate future while more sustainable solutions are commissioned.

With the relationship between waste and climate change and with government focus and local government targets via the Comprehensive Area Assessment for tackling climate change, it is important to give appropriate consideration to how the treatment and management of waste might assist in reducing carbon emissions. The Greater London Authority published the 'Greenhouse Gas Balances of Waste Management Scenarios' in January 2008 drawing conclusions on existing methods of waste management and their performance in relation to greenhouse gas emissions.

The most important point to note is that out of the options currently available both the national and regional waste hierarchies, supported by comprehensive research, rank landfill and incineration as the least favourable options for the treatment of biodegradable waste management.

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<sup>12</sup> Combined Heat and Power or Cogeneration. The simultaneous generation of useable heat and power in a single process, thereby discarding less 'wasted' energy than conventional generation.

<sup>13</sup> Combined Cooling, Heat and Power or Trigeneration. The simultaneous production of mechanical or electrical power, heat and cooling from a single heat source. The power generated from harnessing 'waste heat'.

Though not considered within the scope of this paper, it should be noted that there are alternatives to landfill and conventional incineration, (although incineration is shown to be a proven technology). Options presented as more favourable to either (see the national and regional waste hierarchies) include gasification, and, mechanical biological treatment and anaerobic digestion.

## APPENDIX 5

### Critique of Policies in 'Rethinking Rubbish in London'

#### Background

1. London Councils' (then ALG) response to the London Assembly draft of the Strategy highlighted a number of general concerns including:
  - The very prescriptive approach;
  - The tendency towards 'micromanagement' of the operations of collection and disposal authorities with a Strategy that was more input focussed than outcomes driven.
  - Overly ambitious long-term recycling targets
  - The restrictions on the flexibility in approaches for authorities in managing increasing levels of waste and landfill legislation.
  - Lack of a clear and concise analysis of the resource implications for the region in achieving the proposals.
  - The proposed transfer of significant borough responsibilities to the GLA including the establishment of a single waste disposal authority and a single waste planning authority.

#### Issues Carrying Forward – what do we want to see?

2. 'Rethinking Rubbish in London' was published in 2003. Recognising that the current process is a revision of the existing strategy and subsequent policy documents impacting on waste policy in London such as the London Plan, Table 1 below sets out 12 key policies that London Councils want to see revised or omitted from a revised strategy under the new Mayor. Table 2 sets out the historical position of London Councils to the 44 policies at the time of publication for information.

**Table 1: KEY POLICIES FROM THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY 2003**

Policy	Policy Detail	Position in 2003	Position in 2008
1	<p>London will aim to exceed the recycling and composting targets for household waste set by the Government. These are currently, as set out in Waste Strategy 2000 :</p> <ul style="list-style-type: none"> <li>• to recycle or compost at least 25 per cent of household waste by 2005</li> <li>• to recycle or compost at least 30 per cent of household waste by 2010</li> <li>• to recycle or compost at least 33 per cent of household waste by 2015.</li> </ul>	<p>Supported subject to appropriate resources. London's waste authorities are already committed to achieving their statutory household recycling targets and in contributing to London-wide recovery targets. Moreover, these authorities are committed to the continuous improvement of such services in line with the overall level of resources available, and the competing needs of their residents. The Mayor needs to give clearer indication as to how, and on what evidential basis, he would "insist" on the maximisation of reduction and recycling of waste before energy recovery.</p>	<p>London's waste authorities want to improve their recycling and composting performance but not by collecting more waste. Regional strategy targets should be more intelligent in reflecting London's peculiar circumstances whilst being consistent with and reinforcing national targets.</p> <p>We want to see the strategy place more emphasis on working with waste authorities in developing the powers and tools required to achieve targets rather than a Mayoral determination of how targets will be met.</p> <p>London's waste authorities will work hard towards contributing to the achievement of national targets but would also like to see some jointly agreed approach (possibly through targets) to per capita waste minimisation.</p>
2	<p>London will aim to meet the recovery targets for municipal waste set by the Government, by prioritising reduction, recycling and composting. The Mayor will insist that waste authorities consider options to maximise the reduction, reuse, recycling and composting of municipal waste from all sources before considering the recovery of materials and energy from the residual waste. The targets are currently, as set out in Waste Strategy 2000 :</p> <ul style="list-style-type: none"> <li>• to recover value from 40 per cent of municipal waste by 2005</li> <li>• to recover value from 45 per cent of municipal waste by 2010</li> <li>• to recover value from 67 per cent of municipal waste by 2015.</li> </ul>	<p>The Association agrees that, in the longer term, and given the appropriate tools and resources, more ambitious targets for household recycling could be considered. However, it would not be prudent to establish such targets (other than in a purely indicative sense) in the absence of such resources and tools. This is particularly so given the fact that the government is currently undertaking a review of the National Waste Strategy and the landfill tax credit scheme.</p>	<p>Similar comments as above apply here.</p> <p>Further London's waste authorities are prepared to work with the Mayor targets based on the municipal waste stream in further developing the role of waste authorities in wider resource recovery from waste coming under their control.</p> <p>The revised should include ideas for 'rewarding' or 'incentivising' waste authorities that are successful in their approaches to waste minimisation.</p>
7	<p>London should move towards much greater regional self-sufficiency in waste management. However, in balancing any possible conflicts between such self-sufficiency in the short term and the development of robust recycling infrastructure in the longer term, preference should be given to longer term recycling.</p>	<p>The Association agrees that regional self sufficiency must provide a medium to longer term aim of the waste strategy. This policy rightly indicates that regional self sufficiency might conflict in the short term with the requirement to greatly increase recycling. The Association would emphasise that the overriding principle must be that of BPEO and there is concern that the promotion of one particular waste management option denies waste authorities the tools to manage waste sustainably.</p>	<p>The intent of this policy conflicts, in our view with the requirement in PPS10 for waste to be dealt with in the nearest appropriate installations. Although Policy 4A.21 (London Plan) steps back from this position slightly, it further entrenches self sufficiency by setting minimum volume targets for waste management capacity in London to manage a set and increasing percentage of London's waste. London Councils will push for these targets to be abandoned in favour of an approach that takes account of the benefits of proximity (including by virtue of the existence of sustainable transport modes) and consideration of the need for London</p>

**Table 1: KEY POLICIES FROM THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY 2003**

Policy	Policy Detail	Position in 2003	Position in 2008
			<p>to take prime responsibility for its waste.</p> <p>Setting these types of targets assumes waste growth, promotes a need to provide capacity that is unlikely to be required, is costly in terms of capital investments required and in terms of lost opportunities.</p>
9	<p>The Mayor considers that certain fiscal instruments will be needed to reduce waste and raise recycling rates in the future.</p>	<p>The Mayor needs to make clear what specific fiscal instruments he intends to support, implement and/or lobby for. Such instruments, if put in place will be consulted on and delivered at the national level. The Mayor does not have powers to unilaterally introduce new taxes as mooted in Proposal 106.</p>	<p>LATS and the Landfill Tax Escalator have changed the economics of waste disposal and London Councils welcomes the intent of these instruments. Whilst we have a number of concerns about landfill tax revenue not transparently being returned to local government, we think there may well be further opportunities to look at more London specific proposals such as with the operation of producer responsibility obligations.</p>
12	<p>All waste collection authorities must introduce collections of materials for recycling from households or exceptionally extensive and effective 'bring' systems, in order to meet and exceed the national recycling targets.</p>	<p>While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy? This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming legal advice.</p>	<p>Waste collection authorities (where appropriate working in partnership with their statutory joint waste disposal authority) are best placed to decide what works in their local communities and what is affordable. Regional strategy should not prescribe operations in detail.</p> <p>London Councils supports bottom-up proposals for a collective approach. The Mayor's strategy should acknowledge this possibility.</p>
13	<p>Waste authorities must maintain and extend the current provision of bring recycling facilities, particularly for those materials not collected as part of the authorities' recycling collections from homes schemes.</p>	<p>While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy? This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming</p>	<p>As above.</p>

**Table 1: KEY POLICIES FROM THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY 2003**

Policy	Policy Detail	Position in 2003	Position in 2008
16	For organic waste not composted at home or in the community, the Mayor will request that waste authorities make appropriate provision for collections from homes.	<p>legal advice.</p> <p>While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy? This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming legal advice.</p>	<p>London Councils acknowledges that the management of food waste is the next key challenge for London's waste authorities given its potential to end up in landfill, contributing to GHG production but also in view of its inherent value in anaerobic digestion. London Councils is following relevant research in this area.</p> <p>The Mayor's policy should concentrate on the higher goal of making these links, leaving authorities to decide on the best approach. Incidentally, the number of medium to large capacity AD plants required may mean some, built to serve London's waste authorities may end up just outside London's borders, conflicting with the Mayor's policy on self sufficiency!</p> <p>Any approach on this issue should emphasise minimisation, and then home composting before collections. As stated earlier, waste authorities are in the best position to determine the best approach for their areas.</p>
17	Where waste cannot be reused, recycled or composted, value should be recovered in the form of materials and energy. In the case of energy, this should be done using a process that is eligible for Renewables Obligation Certificates, maximises the efficiency by using both the heat and the electric power, and minimises emissions of pollutants to all media.	<p>The Association believes that the numerous policies contained within the strategy dealing with the waste hierarchy lack internal consistency. The strategy needs to be clear as to what it defines as residual waste. If by residual waste it means that waste that cannot be <i>practically</i> recycled or composted (large), then a strict presumption against energy recovery does not make sense as it will inevitably have to constitute a component of an overall waste management approach. If it defines residual as that fraction of waste that <i>technically</i> cannot be recycled (very small), then a presumption against energy from waste makes more sense, but would need to be based on a fairly heroic belief that all material that can theoretically be recycled is practically recycled. The strategy does not provide any evidence to suggest that such a heroic assumption can be realistically sustained.</p>	<p>Government policy as set out in the Waste Strategy 2007 considers energy from waste as one category of 'energy recovery'. Recovering energy from waste which cannot sensibly be reused or recycled is an essential component of a well-balanced energy policy.</p> <p>International case studies suggest that high rates of recycling and energy from waste can coexist and demonstrate that a vigorous 'energy-from-waste' policy which employs incineration is compatible with high recycling rates.</p> <p>London Councils, in turn, would like to see the Mayor's revised strategy looking at how we can collectively overcome the obvious communications problem surrounding energy from waste in order to get the best possible outcome for London's waste management and energy generation.</p>
20	Waste disposal authorities in London should aim to meet their allocations to reduce the amount of Biodegradable Municipal Waste being land-filled as stipulated within 'Article 5' of the Landfill Directive.	<p>However, the Association believes that the most effective way to make the permit system work is to reduce London's reliance on landfill. This will be achieved by securing a sensible mix of waste management options. An inflexible opposition to</p>	<p>No further comments here apart from an acknowledgement of the increasing role of landfill tax in driving waste away from landfill.</p>

**Table 1: KEY POLICIES FROM THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY 2003**

Policy	Policy Detail	Position in 2003	Position in 2008
		particular technologies may make the strategy a de facto landfill led strategy. As above, by precluding a key waste management option, without first securing tangible alternatives, London risks not meeting its obligations under Article 5 of the Landfill Directive.	
36	The Mayor will lead on improving the arrangements for waste planning in London, so that this occurs on a strategic level but also involves local communities.	<i>It is unclear what powers the mayor will employ to 'lead' on improving the arrangements for waste planning in London. Boroughs are keen to participate in partnership working to improve waste planning in the capital and would have to take the lead in involving the local communities which they represent. Support the proposals to encourage inward investment. Waste planning is dynamic and complex. To adopt a protectionist policy towards all existing waste management facilities without qualification could reduce the flexibility and effectiveness of local authorities to respond to changes in local waste requirements.</i>	<p>In addition to comments made in response to Policies 1 and 2, London Councils acknowledges the stronger Mayoral powers over waste planning in Part 7 of the GLA Act 2007 and the duty of general conformity on waste authorities under Part 8 of the same Act. Further, under the new powers in the Mayor of London Order 2008, the Mayor is now able to call in applications for waste facilities of potential strategic importance.</p> <p>Mayoral intervention in the past has only served to delay the deployment of strategic facilities and London Councils hopes that under the new regime, a policy of 'strict exception' will be adopted by the Mayor towards intervention in borough decisions about waste management facilities for their local areas.</p> <p>With consensus agreement that a single waste authority is not the way forward for waste management in London, The Mayor has a role to play in leading, facilitating and enthusing strategic action but managing the process of waste planning sits with boroughs and a revised strategy should respect this separation of powers and responsibilities.</p>
37	The Mayor will work with relevant stakeholders to encourage inward investment to establish the necessary strategic waste infrastructure across London. This will include seeking to protect existing waste management facilities and the provision of new sites for strategic and local recycling, composting, and other waste processing operations.	<i>It is unclear what powers the mayor will employ to 'lead' on improving the arrangements for waste planning in London. Boroughs are keen to participate in partnership working to improve waste planning in the capital and would have to take the lead in involving the local communities which they represent. Support the proposals to encourage inward investment. Waste planning is dynamic and complex. To adopt a protectionist policy towards all existing waste management facilities without qualification could reduce the flexibility and effectiveness of local authorities to respond to changes in local waste requirements.</i>	<p>As with responses to Policies 1, 2 and 36.</p> <p>The Mayor should not be involved in the detailed decisions on the use of specific sites within a planning authority's area.</p> <p>There is also a cross reference to Policy 22. There is an issue with the confusing legal position on the provision of CA sites in London. We would however like to see some London-wide financial equalisation scheme which could open up all of London's CA sites up to be used by London's residents, irrespective of borough boundaries.</p>
44	The Mayor seeks that all two-tier waste authorities in London have a joint municipal waste management	This is already a requirement on authorities that does not need to be replicated here.	Our position has not changed on this one.

**Table 1: KEY POLICIES FROM THE MAYOR'S MUNICIPAL WASTE MANAGEMENT STRATEGY 2003**

Policy	Policy Detail	Position in 2003	Position in 2008
	strategy, in line with the Government Guidance. This must demonstrate how they will work together to deliver the Mayor's Municipal Waste Management Strategy in their area.		

**TABLE 2 – FULL LIST OF POLICIES IN 2003 MUNICIPAL WASTE STRATEGY AND ALG POSITION AT THAT TIME**

To note, there are forty-four policies embedded within the Strategy (which are then supplemented with 106 proposals). The policies as they are listed here in the second column are as they appear in the final Strategy. The ALG comments are on the draft policies within the consultation. Therefore:

- Where there is no comment shown in the final column, this indicates that the policy is either new or that ALG did not make a comment on the policy in draft form,
- Where the ALG comment is shown in italics, this indicates that there was a similar version of the policy within the draft but it has been amended for the final strategy.
- Some comments will appear more than once because of cross-referencing within the original response.

Policy	Policy Detail	ALG Comments in Response
1	London will aim to exceed the recycling and composting targets for household waste set by the Government. These are currently, as set out in Waste Strategy 2000 : <ul style="list-style-type: none"> <li>• to recycle or compost at least 25 per cent of household waste by 2005</li> <li>• to recycle or compost at least 30 per cent of household waste by 2010</li> <li>• To recycle or compost at least 33 per cent of household waste by 2015.</li> </ul>	Supported subject to appropriate resources. London's waste authorities are already committed to achieving their statutory household recycling targets and in contributing to London-wide recovery targets. Moreover, these authorities are committed to the continuous improvement of such services in line with the overall level of resources available, and the competing needs of their residents. The Mayor needs to give clearer indication as to how, and on what evidential basis, he would "insist" on the maximisation of reduction and recycling of waste before energy recovery.
2	London will aim to meet the recovery targets for municipal waste set by the Government, by prioritising reduction, recycling and composting. The Mayor will insist that waste authorities consider options to maximise the reduction, reuse, recycling and composting of municipal waste from all sources before considering the recovery of materials and energy from the residual waste. The targets are currently, as set out in Waste Strategy 2000 : <ul style="list-style-type: none"> <li>• to recover value from 40 per cent of municipal waste by 2005</li> <li>• to recover value from 45 per cent of municipal waste by 2010</li> <li>• to recover value from 67 per cent of municipal waste by 2015.</li> </ul>	The Association agrees that, in the longer term, and given the appropriate tools and resources, more ambitious targets for household recycling could be considered. However, it would not be prudent to establish such targets (other than in a purely indicative sense) in the absence of such resources and tools. This is particularly so given the fact that the government is currently undertaking a review of the National Waste Strategy and the landfill tax credit scheme.
3	The Mayor aspires to higher targets for recycling and composting and considers they can be achieved in the longer term.	
4	The Mayor will work in partnership with London Remade and London's Waste Authorities to share information on waste through <a href="http://www.capitalwastefacts.com">www.capitalwastefacts.com</a> and improve the availability, reliability and comparability of waste data for London.	The ALG has supported this by contributing to the LWA Supply Infrastructure Project.
5	The Mayor will work with relevant organisations to ensure that statistically reliable, comparable data for the composition and recyclability of London's municipal waste stream is undertaken, to inform strategic decision making.	This is to be supported as strategic waste management will need to be made on the back of reliable and comparable waste data. However, many waste authorities undertake a wide variety of waste data production and they must be fully consulted on any detailed proposals
6	The Mayor will insist that all proposals use the Best Practicable Environmental Option when considering the way to treat particular waste streams taking into account the key considerations of the waste hierarchy, the proximity principle and regional self-sufficiency.	London's waste authorities, both through their waste management and waste planning functions, are already obliged by national policy and guidance to formally consider the BPEO of particular streams and overall policies and strategies. The Association would also suggest that the Mayor's strategy itself should be subject to

Policy	Policy Detail	ALG Comments in Response
		BPEO prior to decisions on the particular approaches to various waste management approaches, not subservient to them. That this should provide the overarching context for its policies.
7	London should move towards much greater regional self-sufficiency in waste management. However, in balancing any possible conflicts between such self-sufficiency in the short term and the development of robust recycling infrastructure in the longer term, preference should be given to longer term recycling.	The Association agrees that regional self sufficiency must provide a medium to longer term aim of the waste strategy. This policy rightly indicates that regional self sufficiency might conflict in the short term with the requirement to greatly increase recycling. The Association would emphasise that the overriding principle must be that of BPEO and there is concern that the promotion of one particular waste management option denies waste authorities the tools to manage waste sustainably.
8	The Mayor recognises the role for partnerships and co-operation in delivering strategic sustainable waste management for London.	There are a number of partnerships that work effectively such as the London Waste Authority (LWA) and the London Recycling Fund (LRF).
9	The Mayor considers that certain fiscal instruments will be needed to reduce waste and raise recycling rates in the future.	The Mayor needs to make clear what specific fiscal instruments he intends to support, implement and/or lobby for. Such instruments, if put in place will be consulted on and delivered at the national level. The Mayor does not have powers to unilaterally introduce new taxes as mooted in Proposal 106.
10	The Mayor supports the reduction and reuse of waste, with an aim to decrease the amount of waste produced per household and slow the overall growth in waste.	
11	Waste authorities should look to maximise the recycling of waste where waste reduction and reuse are not possible, in order to contribute to meeting and exceeding the recycling and composting targets and reduce municipal solid waste to landfill.	
12	All waste collection authorities must introduce collections of materials for recycling from households or exceptionally extensive and effective 'bring' systems, in order to meet and exceed the national recycling targets.	While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy. This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming legal advice.
13	Waste authorities must maintain and extend the current provision of bring recycling facilities, particularly for those materials not collected as part of the authorities' recycling collections from homes schemes.	While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy? This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming legal advice.
14	The Mayor will encourage greater participation in existing and future waste reduction, reuse, recycling and composting schemes.	The Association recognises that participation is a critical ingredient in effective and efficient recycling services. As such, it would support the use of incentives to

Policy	Policy Detail	ALG Comments in Response
		encourage such participation where this is a robust evidence base to suggest that this will be effective. However, boroughs must be free to explore such mechanisms for themselves and in consultation with their residents. The cost of introducing incentives would be a major issue.
15	Waste authorities should maximise waste composting where waste reduction and reuse are not possible, as a means of contributing to recycling and composting targets. A hierarchy of home composting, community composting, then centralised composting should be followed where practicable as part of Best Practicable Environmental Option (BPEO).	
16	For organic waste not composted at home or in the community, the Mayor will request that waste authorities make appropriate provision for collections from homes.	While the Association recognises that such collection will form an integral part of any meaningful approach to recycling, it has concerns that such a policy is too prescriptive. Many policies in the strategy, like this one, get into a very fine grain of operational detail. Boroughs already have statutory targets and best value frameworks will dictate the most cost-effective and acceptable way to meet these. How would the Mayor intend to fund such a policy? This level of 'micro-management' seems to go against the whole thrust of public policy which is seeking decentralised decision making within overall 'outcome frameworks'. Quantified support is subject to forthcoming legal advice.
17	Where waste cannot be reused, recycled or composted, value should be recovered in the form of materials and energy. In the case of energy, this should be done using a process that is eligible for Renewables Obligation Certificates, maximises the efficiency by using both the heat and the electric power, and minimises emissions of pollutants to all media.	The Association believes that the numerous policies contained within the strategy dealing with the waste hierarchy lack internal consistency. The strategy needs to be clear as to what it defines as residual waste. If by residual waste it means that waste that cannot be <i>practically</i> recycled or composted (large), then a strict presumption against energy recovery does not make sense as it will inevitably have to constitute a component of an overall waste management approach. If it defines residual as that fraction of waste that <i>technically</i> cannot be recycled (very small), then a presumption against energy from waste makes more sense, but would need to be based on a fairly heroic belief that all material that can theoretically be recycled is practically recycled. The strategy does not provide any evidence to suggest that such a heroic assumption can be realistically sustained.
18	The Mayor will support proposals for the treatment of residual waste through new and emerging advanced conversion technologies for waste or new waste treatment methods.	
19	In line with Government's waste hierarchy the Mayor considers landfill as the last, and least desirable option for the disposal of London's waste and wishes London to move towards self-sufficiency, as set out in the London Plan. However, the Mayor recognises that there still will be a role for landfill in the disposal of residual waste resulting from recycling, composting, pre-treatment and recovery processes or for waste streams where landfill represents the Best Practicable Environmental Option.	A similar approach needs to be taken with incineration.
20	Waste disposal authorities in London should aim to meet their allocations to reduce the amount of Biodegradable Municipal Waste being land-filled as stipulated within	However, the Association believes that the most effective way to make the permit system work is to reduce London's reliance on landfill. This will be

Policy	Policy Detail	ALG Comments in Response
	'Article 5' of the Landfill Directive.	achieved by securing a sensible mix of waste management options. An inflexible opposition to particular technologies may make the strategy a de facto landfill led strategy. As above, by precluding a key waste management option, without first securing tangible alternatives, London risks not meeting its obligations under Article 5 of the Landfill Directive.
21	In order to promote a sustainable approach to managing landfill gas, waste disposal authorities should encourage the use of landfill gas as a renewable energy source (heating or electricity).	Where this is practicable.
22	The Mayor will promote a programme to enhance and promote opportunities for recycling and reuse and levels of service at existing Civic Amenity sites in London, to be re-branded as 'Reuse and Recycling Centres'. These Centres must be available free of charge to all Londoners when depositing household waste.	This may present problems as many boroughs charge for the use of CA sites by non-residents. Legal advice is being sought regarding the requirement of re-branding sites and to make them free of charge.
23	The Mayor will work with the London boroughs improve the standard of cleanliness on London streets and public areas, and to combat environmental crime.	
24	The Mayor with waste authorities will seek to ensure that all abandoned vehicles are managed to a high standard and in a way that is compliant to all relevant UK legislation.	The Association has already done extensive work in this area and would encourage the GLA to help build upon this. In particular we have developed and conducted training seminars and courses that have resulted in the majority of the boroughs now having officers with city and guilds qualifications. We have also lobbied for changing legislation and practices which now mean that boroughs have powers to remove AVs within 48hours.
25	The Mayor will encourage waste from special events to be reduced, reused and recycled where possible.	Where this is practical
26	The Mayor will seek to ensure that all waste authorities obtain maximum benefit from contributing towards the targets of the packaging waste regulations on behalf of obligated businesses.	Boroughs already do this where possible. In many cases the process does not allow local authorities to derive benefits from the Packaging regulations.
27	The Mayor supports the objectives of the Directives on Waste Electrical and Electronic Equipment to avoid the generation of, reduce the pollution and harmfulness of, and increase the recycling opportunities for waste electrical and electronic equipment.	
28	The Mayor will seek to ensure that all waste authorities have made the necessary arrangements to manage all waste refrigerators appropriately and efficiently, meeting the requirements of the ODS Regulations and where possible ensuring reuse options are considered before recycling.	Authorities are already doing this, and the issue of re-use is limited.
29	Waste authorities need to ensure that the Environmental Protection (Disposal of and other Dangerous Substances) Regulations 2000 have been adhered to and that all local authority property potentially housing PCB containing equipment has been investigated.	Authorities are complying with regulations.
30	The Mayor wishes to achieve the segregation of all Hazardous Household Waste from the normal household waste stream, to enable higher recycling rates though the	Such a desire is more in the gift of the government, which through the Controlled Waste Regulations could allow for the charging for collection of Hazardous

Policy	Policy Detail	ALG Comments in Response
	avoidance of cross-contamination to potentially recyclable materials and to reduce the Health and Safety risk to all and to the environment.	Household waste.
31	The Mayor will seek to ensure that all waste collection authorities make all necessary arrangements to manage all clinical waste associated with municipal waste arising in London to a high standard.	Where practical.
32	The Mayor will seek to secure effective resources for London-wide promotion to complement local and national initiatives. The Mayor will promote messages on waste reduction, reuse and recycling, through a London-wide programme to raise awareness of all Londoners but particularly children.	
33	The Mayor, through the London Development Agency, will continue to support the development of new reprocessing industries, including new business opportunities and job creation.	London Remade is a project of LWA. LWA is a partnership between ALG and London First, and this is something that has long been promoted.
34	The Mayor will lead by example to reduce waste, through reusing and recycling and by using refurbished and recycled products and materials, where available.	
35	The Functional Bodies, London boroughs and joint statutory waste disposal authorities should follow the Mayor's example at the GLA and develop and adopt a comprehensive environmental policy that will embrace green procurement of all goods and services.	Most Boroughs are already incorporating environmental criteria in procurement practices. This should not be made a matter of compunction and the Mayor has no powers to enforce it.
36	The Mayor will lead on improving the arrangements for waste planning in London, so that this occurs on a strategic level but also involves local communities.	<i>It is unclear what powers the mayor will employ to 'lead' on improving the arrangements for waste planning in London. Boroughs are keen to participate in partnership working to improve waste planning in the capital and would have to take the lead in involving the local communities which they represent. Support the proposals to encourage inward investment. Waste planning is dynamic and complex. To adopt a protectionist policy towards all existing waste management facilities without qualification could reduce the flexibility and effectiveness of local authorities to respond to changes in local waste requirements.</i>
37	The Mayor will work with relevant stakeholders to encourage inward investment to establish the necessary strategic waste infrastructure across London. This will include seeking to protect existing waste management facilities and the provision of new sites for strategic and local recycling, composting, and other waste processing operations.	<i>It is unclear what powers the mayor will employ to 'lead' on improving the arrangements for waste planning in London. Boroughs are keen to participate in partnership working to improve waste planning in the capital and would have to take the lead in involving the local communities which they represent. Support the proposals to encourage inward investment. Waste planning is dynamic and complex. To adopt a protectionist policy towards all existing waste management facilities without qualification could reduce the flexibility and effectiveness of local authorities to respond to changes in local waste requirements.</i>
38	The Mayor, in conjunction with other stakeholders, will seek to identify barriers to sustainable waste management, and will lead on the influencing of national legislation to make changes beneficial to the future of sustainable management of waste in London.	The Mayor is in a prime position to provide such lobbying from a London wide perspective. The Association and boroughs would welcome working in close partnership to achieve these ends. Securing the resources for the London Recycling Fund, is a good example of partnership working.

Policy	Policy Detail	ALG Comments in Response
39	The Mayor will, in line with the Best Practicable Environmental Option, aim to minimise the environmental impact of the collection and transportation of waste and recyclables, both before and after processing.	
40	The Mayor will work with all agencies, including TfL and the LDA, to develop the capacity of sustainable modes for the transport of waste and recyclables in London, and will promote new schemes where they are feasible within this overall framework.	
41	The Mayor, will seek to secure for London's waste authorities London's fair share of funding to invest in sustainable waste management and with partners, will seek an increase in the total funding provided.	
42	The Mayor will aim to achieve, in liaison with waste authorities, a minimum service level and consistency in waste contracts across London. This will take into account the uniqueness of each London borough and will be developed through the sharing of best practice.	
43	The Mayor will take into consideration the aims and objectives of Best Value when reviewing waste contracts.	
44	The Mayor seeks that all two-tier waste authorities in London have a joint municipal waste management strategy, in line with the Government Guidance. This must demonstrate how they will work together to deliver the Mayor's Municipal Waste Management Strategy in their area.	This is already a requirement on authorities that does not need to be replicated here.