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By email: rachel.roscow@london.gov.uk

Dear Ms Roscow,

LONDON ASSEMBLY'S ENVIRONMENT COMMITTEE INVESTIGATION INTO FOOD WASTE MANAGEMENT – LONDON COUNCILS' SUBMISSION

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

London Councils makes the case to government, the Mayor and others to get the best deal for Londoners and to ensure that our member authorities have the resources, freedoms and powers to do the best possible job for their residents and local businesses.

The strategic direction of London Councils is set by the Leaders' Committee comprising of the Leaders of all of London's local authorities. London Councils also has a Transport and Environment Committee consisting of elected representatives from each of London's local authorities with statutory duties and responsibilities for transport and environment matters.

Our response to the London Assembly's Environment Committee investigation into food waste management has been developed following consultation with London's local authorities. It includes key considerations regarding food waste management including local decision-making and priorities, financial pressures, pan-London approaches to food waste prevention and proposals for the devolution of the landfill tax to London. Detailed responses to the investigation's questions are also provided.

Yours sincerely

A handwritten signature in blue ink that reads "John O'Brien".

John O'Brien
Chief Executive

London Assembly's Environment Committee investigation into food waste management – Call for Evidence

Executive Summary

1. Each year, London local authorities spend £720m in waste management services, making it the third largest area of local authority expenditure after social care and education¹. The on-going pressures on local authorities' finances diminish their capacity to expand or improve some services as councils are having to focus on finding efficiencies that enable them to secure front-line services.
2. Therefore naturally, in this context, the overall picture of food waste management varies across London. Currently, about 51 per cent of London's households have separate food or mixed organics waste collections². In some boroughs, the service is offered to kerbside properties only or to properties with gardens which mix food and garden waste together. Separate food waste collections are also offered to flats and estates through communal bins and bring banks.
3. Separate food waste collection services are in addition to the statutory collections of refuse waste and dry recycling, therefore it is up to each individual local authority to decide whether to offer separate food or organics waste collections to their residents or continue to mix food with general refuse collection. For boroughs opting for mixing food with general refuse waste, the environmental benefits of separate food waste collections may not be significant enough to outweigh the costs of the additional collection, especially if compared with the option of sending refuse waste to an energy-from-waste (EfW) facility. London Councils believes local-decision making should be widely acknowledged and respected.
4. For those boroughs which offer separate food or organics waste collections, the introduction of this service has been incremental. After successful trials, councils are expanding this service, in some cases reaching 80-100 per cent of households. Many of them are making use of the limited funding available at pan-London level, through the London Waste and Recycling Board (LWARB), and at national level to introduce or further expand domestic food waste recycling.
5. With a forecast to reach 10 million people by 2031, London's demographic pressures are increasing the demand for housing. To avoid future under-performance in recycling, it is crucial that new buildings are designed with the appropriate facilities for storing domestic waste, including food waste, both inside the flats/houses and in the adjacent areas.
6. However, currently residents' participation levels are not very high. This is partly due to public perception of food waste (smells, flies and vermin), and due to the increasing 'green fatigue' and public scepticism towards recycling, including food waste. To increase performance, more communications and repeated engagement is required. However, in the current financial climate, councils do not have the resources to implement large campaigns without additional funding from LWARB or national government. In our recent response to the EFRA Select Committee inquiry on waste management in England³, London Councils has asked for the government

¹ London Councils, 2014

² WRAP 2014 Survey on local authorities' waste collections schemes. The results of this survey are not publicly available yet.

³ <http://www.londoncouncils.gov.uk/policylobbying/environment/waste/EFRAinquiryresponse.htm>

to provide further support for domestic separate food and organic waste collection services.

7. The Mayor, LWARB and London boroughs can all play their part in supporting investment in the right technologies for treating food waste such as anaerobic digestion facilities and in-vessel composting, especially in those areas which are still reliant on landfill disposal. At the moment, there is no direct link between any savings made in landfill tax and investments into recycling and composting. The landfill tax, has proved successful in reducing the amount of waste sent to landfill but it has also become a revenue raising mechanism for the Treasury. Following the example of devolved administrations, London Councils has asked for the government to consider devolving the landfill tax to London in a similar way to the new Scottish landfill tax and the proposed Welsh landfill tax. London boroughs generate c. £60m in landfill tax each year⁴, the devolution of which would be a huge boost for the much needed investment for waste infrastructure in the capital.
8. Finally, whilst food and organics waste collections deliver environmental benefits, the potential of reducing food waste through waste prevention initiatives is much higher and also delivers greater savings for both residents and councils. In London, 60 per cent of the food waste generated each year is avoidable⁵. The impact of Love Food Hate Waste campaign aimed at tackling food waste in households has demonstrated the potential for behaviour change. Therefore supporting food waste prevention initiatives needs to be prioritised, as well as looking at food waste recycling.
9. To conclude, London Councils asks the London Assembly's Environment Committee to:
 - Acknowledge boroughs are best placed to make local decisions that best serve the needs of their residents, including in relation to waste management;
 - Recognise the efforts London boroughs are making to continue to improve waste management, in particular food waste, within the context of the current difficult financial climate;
 - Emphasise the importance of more pan-London approaches in waste prevention which London boroughs can capitalise at local level; and
 - Support the proposals for devolution of the landfill tax to London, so that it can be reinvested in infrastructure which can help improve the management of domestic waste in the Capital.
10. Detailed responses to the London Assembly's Environment Committee investigation are provided below.

⁴ <https://www.gov.uk/government/publications/local-authority-revenue-expenditure-and-financing-england-2012-to-2013-individual-local-authority-data-outturn>

⁵ [The impact of Love Food Hate Waste in West London case study, WRAP](#)

Questions

Establishing the baseline

Overview of domestic organic and food waste collections in London:

11. There is a wide variation in separate food or organic waste collections across London. This service is in addition to the statutory collections of refuse waste and dry recycling, therefore it is for each individual local authority to determine whether they wish to offer separate food or organics waste collections.
12. Data provided by WRAP (Waste and Resource Action Programme)⁶ from their 2014 survey on local authorities' waste collections schemes, yet to be published, indicates that 1.7 million (51 per cent) households in London have separate food or mixed organics⁷ waste collections, a 14 per cent increase since 2011/12.
13. Following successful trials, those boroughs which have opted for separate food or organic waste collections have been able to expand this service to more properties. The type of service offered adapts to each boroughs' local circumstances:

Type of collection scheme	Number of boroughs
Separate food waste collections to all/some of both kerbside properties and flats	9
Mixed organics waste collections to all properties with garden and separate food collections to all/some of flats	3
Separate food waste collections to kerbside properties only	5
Mixed organics waste collections to kerbside properties only	6
No separate food collections of mixed organics waste collections	10

Table 1. Food waste collections' schemes in London. Source: WRAP 2014 Survey

14. The coverage of the services is also varied. In some boroughs, the service is offered to a 100-80 per cent of households whilst in others, the coverage is much lower. Ten boroughs have not introduced separate food or organics waste collections. In these cases, the environmental benefits of separate food waste collections do not appear to be significant enough to outweigh the costs of the additional collection, especially if compared with the option of sending refuse waste to an EfW.

How has food waste management changed in London over the past 5-10 years? How much has the industry grown?

15. The management of municipal waste in London and the UK has changed significantly over the last years. In 2000/01, London used to recycle 9 per cent of its household waste, 19 per cent was sent to incineration and 72 per cent to landfill. In

⁶ <http://www.wrap.org.uk/>

⁷ Mixed garden and food waste.

2012/13, the amount of waste sent to landfill reached a minimum low of 25 per cent, with recycling up at 34 per cent and incineration at 41 per cent⁸.

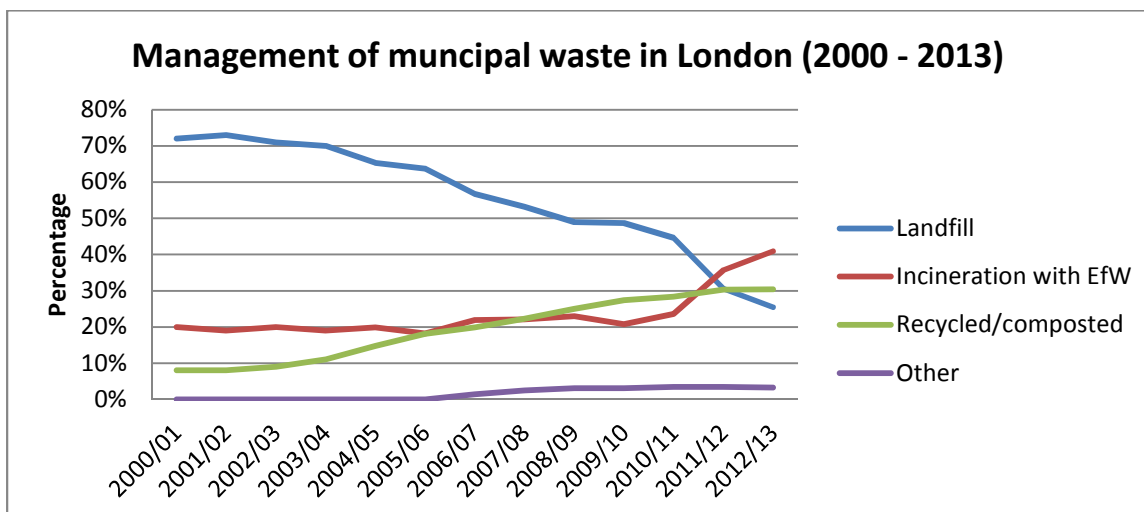


Figure 1. Management of municipal waste in London 2000/01 – 2012/13⁹.

16. In recent years, many London boroughs have introduced separate food waste collections firstly to street level properties and gradually to flats. Councils have also been actively promoting home composting to those households with gardens and to some estates through community composting schemes. The home compost is used in the residents' gardens or communal areas and there is no need for councils to collect it. Two examples of separate food waste collection services in Hackney and Bromley are described below.
17. In 2007, Hackney introduced weekly food waste collections across all street level properties and communal food waste bins in a small number of estates covering 5,000 properties. Since then, the council has carried out trials on provision of free liners, door-knocking campaigns and has also revised the collection schedules in street level properties so that each household received its residual, commingling and food waste collections on the same weekday. In autumn 2013, with the support of LWARB and Department for Communities and Local Government (DCLG) funding, the service was rolled out to 30,000 flats. Currently, the service has 90 per cent coverage and participation levels of 31 per cent (with a 40 per cent rate being deemed to be excellent performance). Hackney has also set up community composting in five estates and has been collecting food waste from a number of schools. A borough-wide food waste communications campaign is being planned for autumn 2014 (Annex 1 includes a detailed case study on Hackney's food waste collection services).
18. In 2010, Bromley introduced a borough-wide food waste collection service for all street level properties. At the same time, the council changed the frequency of the paper collection to weekly, and reduced the frequency of the residual collection to every other week. A year later, the service was expanded to include all flat properties. In 2008, prior to introducing the service, the council had implemented several trials which explored different frequencies of collection for residual waste, and options of co-collecting food waste and garden waste together. Customer

⁸ [Local authority collected waste statistics 2012/13, Defra](#)

⁹ Ibid.

satisfaction surveys were also carried out at the time when the service was introduced. As a result of the introduction of separate food waste collections, Bromley has experienced a 35 per cent fall in the tonnage of residual waste collected and a 9 per cent fall in total waste arisings.

19. In 2011, Wandsworth considered the option of introducing separate food waste collections when the council was tendering its waste collection contract. The council asked tenderers to consider in their bid a separate food waste collection service for 85,000 properties. In Wandsworth all residual waste is already diverted from landfill and sent to EfW facility in Belvedere. They concluded the carbon measurements indicated very small or non-existent benefits, depending on whether the material was composted or anaerobically digested. The economic analysis showed that to offset the annual collection cost with disposal savings, a 70 per cent capture rate would have been necessary, a rate unlikely to be achieved when 40 per cent is already considered to be excellent performance. Also, 55 per cent of residents consulted in advance did not support the implementation of this service.
20. In 2013, Sutton also concluded the capital and revenue costs of collecting food waste separately were too high compared to the environmental benefit that anaerobic digestion had over energy recovery and communal composting. To consider introducing separate food waste collections in Sutton in the future, the costs of operating a separate collection plus anaerobic digestion gate fee will need to be lower than the cost of collecting food waste within the residual waste and the EfW facility gate fee. Sutton has received funding from DCLG's weekly collections fund to further promote the Love Food Hate Waste campaign and subsidise up to 20,000 home compost bins.
21. The East London Waste Authority (ELWA) PFI¹⁰ contract with Shanks led to the construction of two Bio-MRF mechanical-biological treatment facilities. This technology facilitates major diversion from landfill, without the boroughs/ELWA having direct access to their own EfW facility. The process involves the waste being shredded before it is put into drying halls. As the organic material decomposes, it enables a 30 per cent reduction in weight to be achieved through moisture loss. The Bio-MRF produces two main products: the lightest, best-quality fuel is classified as Solid Recovered Fuel, and it is used in cement kilns. The bulk of what is produced is classified as Refuse Derived Fuel, and it is exported to Europe for use in EfW facilities. In addition to that, there is some extraction of glass and stones for use as aggregate, as well as metals for recycling. There are also some residues from the process, including a 'compost-like output' (CLO), which currently is sent to landfill but Shanks are looking into exploiting it in the market. If Shanks finds a market for the CLO, the bulk of food waste from its' constituent boroughs will actually be recycled, albeit after a significant reduction in weight through the drying. Therefore currently, the four London boroughs which make up ELWA - Barking and Dagenham, Havering, Newham and Redbridge – do not offer separate food waste collections as the technology for treating refuse waste, in their area, requires food waste to be present in the residual waste mix.
22. These examples show that there are different approaches to food waste collection and treatment in London, reflecting specific local circumstances and priorities. They also indicate that the environmental and economic case for introducing separate food collections is unclear when refuse waste is sent to EfW facilities, compared to landfill. London Councils believes local-decision making should be widely acknowledged and respected.

¹⁰ PFI – Private Finance Initiative.

Food waste reduction initiatives in London:

23. In our recent response to the EFRA Select Committee inquiry on waste management in England¹¹, London Councils has asked the government to place greater emphasis on waste minimisation as reducing waste in the first place is the best environmental and cost-effective option, rather than recycling.
24. It can be argued that local authorities have little leverage in getting their residents to produce less waste and that businesses, in particular the grocery sector, are the only ones who can effectively reduce waste through product design, less packaging or the promotion of re-usable bags. However, the impact of WRAP's Love Food Hate Waste campaign (LFHW)¹² aimed at tackling food waste in households has demonstrated the potential for attitude and habit change.
25. The Love Food Hate Waste campaign (LFHW) was launched by WRAP in 2007. Its aim was to raise awareness on food waste prevention and give practical advice on how to reduce food waste and save some cash in the process.
26. Between October 2012 and March 2013, Recycle for London (RfL)¹³, a programme delivered in partnership between the Greater London Authority (GLA) and WRAP, and funded by LWARB, delivered a pan-London LFHW campaign. The campaign included radio, digital and print advertising along with supporting PR activity. The campaign was supported at borough level by community engagement activities such as cookery classes, food waste presentations and engagement through a network of volunteers. Some of these were coordinated at sub-regional level through the joint waste disposal authorities.
27. In some boroughs, such as Newham, where many residents shop in markets or high-street shops, rather than in big supermarkets, the campaign was not perceived as effective as residents were not exposed to the main advertising areas. The council has suggested to WRAP developing some resources that could be used in markets and smaller shops.
28. An in-depth evaluation¹⁴ undertaken in west London proved that LFHW helped reduce avoidable food waste by 14 per cent, from 2.6kg per household per week pre-campaign to 2.2kg post-campaign. The reduction in avoidable food waste would save the boroughs of West London £559,000 per annum in disposal costs (including gate fees and landfill tax). The costs associated with delivering the campaign were around £170,000, so for every £1 invested, west London boroughs saved up to £85.
29. Having a pan-London LFHW meant that the impact of the campaign was amplified across London. Residents that live and work in different London boroughs were provided with a consistent message around reducing food waste. Several councils continue to support LFHW via event engagement, social media and adverts in local newspapers, even if the pan-London campaign activity has been reduced.
30. Some boroughs are also encouraging donations of unwanted food to food banks and actively promoting food waste disposers/macerators in developments to reduce the quantity of food waste requiring collection and to reduce odour and fly issues related to waste storage. In the past, the "Recycle Western Riverside" campaign across the Western Riverside Waste Authority area used to arrange occasional

¹¹ Ibid3.

¹² <http://www.lovefoodhatewaste.com/>

¹³ <http://www.recycleforlondon.com/>

¹⁴ Ibid5.

outreach events like “Feeding the 5,000”¹⁵ at Roehampton University. More recently, London boroughs are promoting the Mayor’s FoodSave¹⁶ scheme to their local businesses.

Extending and improving food waste collection

What are the current barriers to managing domestic food waste effectively in London, particular with regard to blocks of flats on estates?

31. Many boroughs have the collection systems, facilities and equipment in place to manage food waste better, however, in some cases, the take-up of food waste recycling services is very low amongst residents. This is partly due to public perception of food waste (smells, flies and vermin), but more importantly, the increasing ‘green fatigue’ and public scepticism towards recycling¹⁷, including food waste. WRAP is currently undertaking research which aims to understand the reasons why residents do not recycle correctly.
32. LWARB’s programmes aimed at boosting recycling such as the Flats Recycling Programme in 2010 or the Driving Up Performance Fund in 2013 prove that communications and education is crucial to increase performance. For food waste collections, the key lessons learned from LWARB’s Flats Recycling Programme showed that:
 - Provision of free liners and higher investment in communications can result in higher performing schemes.
 - Delivering communal bins, caddies and liners at the same time as communications materials ensures that residents understand how to correctly participate in food waste schemes from the outset. Combining door to door canvassing with delivery of equipment and communication materials in particular seems to be a sensible approach.
33. To increase performance, more communications and repeated engagement is required. However, in the current financial climate, councils do not have the resources to implement large campaigns without additional funding.
34. Similarly, for separate food waste collections to be more widely accepted, the same practices of food waste separation at home should be applied and mainstreamed elsewhere, whether it is at work, in schools and universities, in hospitals or on the streets.

How do you plan or hope to introduce, extend or improve domestic food waste recycling? What specific barriers have you identified? What support (e.g. financial or technical) would you require to overcome these?

35. The key challenge boroughs face in introducing, expanding or improving domestic food waste recycling is finance. Some are making use of the limited funding available at pan-London and national level to do so, but the funding available is not enough to create a real step change.

¹⁵ <http://www.feeding5k.org/>

¹⁶ <http://www.london.gov.uk/priorities/environment/putting-waste-good-use/foodsave>

¹⁷ [Unpacking the Household: Exploring the dynamics of household recycling](#), Coca-Cola Enterprises, 2013

36. In several cases, where boroughs have considered the option, the benefits of introducing new separate food waste management become marginal and therefore difficult to justify in economic terms, given the current pressures on borough budgets. As highlighted in the previous section, there are significant barriers to increasing residents' participation in food waste collections and more targeted messages to individuals and innovative approaches are necessary to change behaviour.
37. However, boroughs do not have the funding and resources to invest in large behaviour change campaigns. If the landfill tax were to be returned to London, following the example from Scotland and Wales, the extra £60m London local authorities generate each year in landfill tax could support investment in waste infrastructure and more experimental approaches in waste management which are not economically viable at the moment.
38. As of April 2014, Defra is 'stepping back' in areas of waste management, significantly reducing the funding available for WRAP, therefore it is unlikely that new funding will be made available at national level for improving food waste recycling. Currently guidance best practice documents and online tools on food waste prevention are available at WRAP's website¹⁸, however, funding cuts to WRAP will reduce the technical support that they are able provide in the future.

Following LWARB's flats recycling programme, how can those managing estates and large blocks of flat continue to introduce and improve food waste recycling? What other funding and guidance is still available now and how can boroughs and others access it?

39. To address the challenge highlighted above, in our recent response to the EFRA Select Committee inquiry on waste management in England, London Councils has asked for the government to provide further support for separate organic waste collection services as a means to increase recycling and support alternative food waste reprocessing technologies such as anaerobic digestion and in-vessel composting.
40. On 3 June 2014, LWARB re-launched its Borough Communication Support programme. £100,000 of funding has been made available to boroughs to support communication activity aimed at improving the performance of recycling and re-use services. One of the priority areas for this new fund is low performing areas such as estates and large blocks of flats. Whilst any additional funding provided by LWARB is good news, London boroughs would benefit from a larger more continuous fund that enables them to plan their communications activities accordingly.
41. Apart from this new funding from LWARB, London Councils is not aware of any other funding streams which would facilitate the introduction and improvement of food waste collections and further bidding for pockets of funding is quite time consuming for boroughs, especially as staff resources are being reduced as a result of budget cuts.

¹⁸ <http://www.wrap.org.uk/>

Are there any national or international examples of good practice for managing domestic food waste in densely-built, urban environments from which London could draw lessons?

42. Earlier this year, the House of Lords EU Agriculture, Fisheries, Environment and Energy Sub-Committee conducted an inquiry into the EU's contribution to food waste prevention. The report, 'Counting the Cost of Food Waste: EU Food Waste Prevention'¹⁹, published on 6 April 2014, includes a list of food waste initiatives and programmes across the EU. However, these examples focus on food waste prevention and do not make any references to densely-built urban environments.
43. A widely-recognised European best practice case study on waste management in urban areas is the Augustenborg Eco-City in Malmö (Sweden)²⁰. This project aimed to regenerate a low-income residential area built in the 1950s. Improving waste management was part of an integrated project which addressed issues such as water management, eco-building, sustainable mobility and green areas. The City of Malmö installed 15 recycling houses with full recycling and composting facilities for the 1800 inhabitants of Augustenborg. Their recycling rate is now 70 per cent, including food waste which is used for home composting and to generate biogas²¹.
44. Hackney's Zero Waste Place Path Finder Project²² has also received ample international recognition. In 2009, the residents in Follingham Court Estate successfully implemented a number of waste reduction measures with support from Hackney Council and LCRN (London Community Resource Network). Following the project, recycling increased from 0.5 to 2 tonnes per year and refuse was reduced by 16 tonnes per year. Such schemes are heavily reliant upon key individuals within the community. However, with a high level of transient population in the borough, the sustainability and longevity of such schemes are often at risk.

How can the Mayor and local authorities use their investment and planning powers to promote better collection and handling of food waste?

45. The Mayor, LWARB and London boroughs can all play their part in supporting investment in the right technologies for treating food waste such as anaerobic digestion and in-vessel composting, especially in those areas which are still reliant on landfill disposal.
46. There are also ample opportunities to use planning powers to promote better collection of food waste, especially in new developments. To avoid future under-performance in recycling, it is crucial that new buildings are designed with the appropriate facilities for storing domestic waste, including food waste, both inside the flats/houses and in the adjacent areas. The buildings also need to ensure waste collection vehicles can easily access waste storage areas.
47. Several boroughs have a well-established refuse and recycling storage guidance for planners and architects submitting planning applications. The boroughs' waste advisors review all applications to ensure all new developments meet the waste and recycling storage requirements. Councils also promote the use of the Code for

¹⁹ <http://www.parliament.uk/documents/lords-committees/eu-sub-com-d/food-waste-prevention/154.pdf>

²⁰ <http://www.malmo.se/English/Sustainable-City-Development/Augustenborg-Eco-City/Waste-management.html>

²¹ <http://knowledge.allianz.com/environment/energy/?514/how-malmo-recycles-waste>

²² http://www2.wrap.org.uk/downloads/Hackney_case_study_v4.477397bb.11299.pdf

Sustainable Homes (the code) and BREEAM (Building Research Establishment Environmental Assessment Method) schemes to encourage better waste facilities in new developments.

48. However, as proposed by the government in the Housing Standards Review consultation²³ which took place in October 2013, the Code is likely to be dissolved or severely curtailed, in favour of encouraging new development.
49. Some boroughs are also keen on exploring the possibility of diverting food waste to the sewerage system via food waste macerators in kitchens. The food waste collected can then be sent to an anaerobic digestion plant. However, Thames Water remains strongly opposed, fearing this practice will cause sewer blockages. Councils are monitoring trials in Shropshire and the Cotswolds.

Processing food waste

What happens to the domestic food waste that you collect?

50. The food waste collected separately or mixed with garden waste is usually sent to anaerobic digestion (AD) or in-vessel composting (IVC) plants. Data on disposal routes is available on WasteDataFlow²⁴, the web based system for municipal waste data reporting by UK local authorities to government.
51. Data from London's local authorities show the following destinations:
 - A D A S Holdings Ltd;
 - Biffa Waste Services Ltd;
 - Biogen (U K) Ltd;
 - Cannington Enterprises Ltd;
 - New Earth Solutions (Kent) Ltd;
 - Countrystyle Recycling (Suffolk) Ltd;
 - Country Compost Ltd;
 - County Mulch Ltd;
 - Envar Ltd;
 - F C C (UK) Limited;
 - Laverstoke Park Produce Llp;
 - LondonWaste Ltd;
 - Material Change Corby Limited;
 - Reviva Composting Ltd;
 - Sita Surrey Ltd;
 - TEG Energy Ltd;
 - Vertal Ltd;
 - Veolia Es Cleanaway;
 - Veolia Environmental Services West Berkshire Ltd;
 - Viridor Waste Management Ltd;
 - Viridor Waste Suffolk Ltd;
 - Waste Recycling Group (Central) Ltd;
 - West London Composting Ltd.

²³ <https://www.gov.uk/government/consultations/housing-standards-review-consultation>

²⁴ <http://www.wastedataflow.org/>

52. In many cases, the nutrient rich compost is then used in agriculture, allotments, community growing projects, parks and green spaces, including back to the boroughs which have collected the food waste in first instance.

What are the benefits and difficulties of different ways of processing food waste, for example composting or anaerobic digestion, in an urban environment?

53. Boroughs use different tools to assess and compare the carbon footprints of different treatment options. The most commonly used are the 'Government conversion factors for company reporting' tool²⁵ and the Mayor's Greenhouse Gas Calculator²⁶, a free tool that can be used to determine the emissions of an authority's unique waste management solutions.
54. Based on these assessments, AD seems to be the preferred option, as it is a completely enclosed system, which minimises odour issues and produces biogas. Composting is not as beneficial in carbon terms although it achieves significant carbon savings if waste is diverted from landfill.

In what ways is recycling food waste beneficial to London's environment?

55. Food waste recycling helps to reduce CO₂ emissions. WRAP has estimated that in London alone, 890,000 tonnes of food is thrown away per year, of which 540,000 tonnes is avoidable. The cost to London boroughs of reprocessing/disposing of this food waste is estimated at over £50million per annum. It costs consumers £1.4billion per year to purchase the food and drink thrown away in London, and generates the equivalent of 2.1 million tonnes of CO₂e²⁷.
56. According to the latest WRAP survey on household food and drink waste in the UK²⁸, two thirds of the household food and drink waste in the UK gets collected by local authorities.
57. As stated above, 540,000 tonnes of food that is thrown away each year (61 per cent) is avoidable. Hence the importance of supporting food waste prevention initiatives, as well as food waste recycling.

What opportunities do you see for the waste management industry to expand or optimise its activities in London? What are the key factors involved (e.g. minimum amount of feedstock for processing)?

58. There is a need to make the correct strategic decisions at both national and subnational level to provide the right mix of treatment infrastructure and therefore avoid future overcapacity. Localism-based approaches to dealing with waste generate benefits (jobs, income, and energy recovery) to the local community which can lead to a sense of ownership and result in greater recycling. However, investment in waste infrastructure is significantly dependant on guaranteed input tonnages, and this will be difficult to achieve without a robust strategy.

²⁵ <http://www.ukconversionfactorscarbonsmart.co.uk/>

²⁶ <https://www.london.gov.uk/priorities/environment/putting-waste-good-use/making-the-most-of-waste>

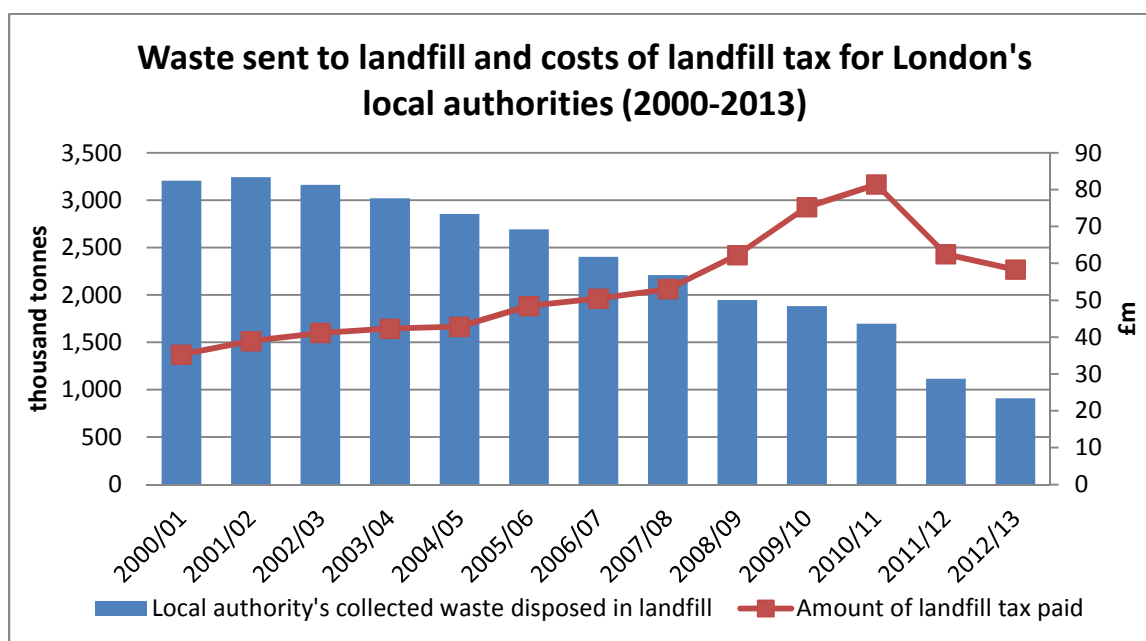
²⁷ <http://www.wrap.org.uk/content/west-london-food-waste-campaign>

²⁸ <http://www.wrap.org.uk/content/household-food-and-drink-waste-uk-2012>

59. The London Plan provides a list of 'Opportunity and Intensification' areas. Consideration needs to be given to waste management at the early stages of planning for new developments, including discussions with the waste management industry about where the additional waste will be processed and potential locations for new facilities.

How do savings in landfill tax relate to possible investment into recycling and composting? What is the role of gate fees in this respect?

60. At the moment, we are not aware of a direct link between savings made in landfill tax and investments into recycling and composting
61. The landfill tax was introduced in 1996 and has been escalating at a rate of £8 per tonne, making alternative technologies more competitive. In April 2014, the tax reached a limit of £80 per tonne. Earlier this year, the government confirmed that this tax would continue to rise in line with inflation, from April 2015 onwards.
62. The landfill tax was originally designed as a means of reducing the amount of waste being sent to landfill by using the revenue to reinvest in waste infrastructure. However, there is no clear evidence that this has been the case to date and landfill tax now appears to be a revenue raising mechanism for the treasury.
63. Whilst the amount of waste London boroughs send to landfill has substantially decreased, the cost of landfilling continues to rise as a result of the landfill tax and gate fees. The following graphs shows the reduction in the amount of waste sent to landfill by London's local authorities and the costs associated to the landfill tax since 2000/01.



Source: [ENV 18: Local authority collected waste management dataset - 2012/13](#), Defra.

64. The costs associated with the landfill tax peaked in 2010/11 with £81m paid to the treasury and since then, this amount has been decreasing due to a reduction on the overall amount of waste generated and more waste being diverted from landfill towards incineration and recycling. The latest figures from 2012/13 show that London paid £58m in landfill tax. Adding the cost of gate fees (a levy charged upon

a given quantity of waste received at a waste facility), the cost for landfilling rises to £77.5m²⁹.

65. With regard to the future of the landfill tax, changes are being made with relation to the devolved administrations, with Scotland retaining the landfill tax from 2015³⁰ and Wales from 2018³¹. The devolved tax is regarded as a means to further support the ambitious zero waste strategies and targets being pursued in Scotland and Wales.
66. In order to support London's continued population and economic growth, the London Finance Commission³² has made the case for more financial and fiscal control for London. One of its recommendations suggests the possibility of devolving the landfill tax to London. As stated above, in 2012/13 London generated £58m in landfill tax, the devolution of which would be a huge boost for the much needed investment for waste infrastructure in the capital. This investment should be in the technologies and local authority services that most reduce CO2 emissions not just those that help to increase recycling rates.
67. In our recent response to the EFRA Select Committee inquiry on waste management in England³³, London Councils has asked for the government to consider devolving the landfill tax to London in a similar way to the new Scottish landfill tax and the proposed Welsh landfill tax.

²⁹ [WRAP Gate Fees report 2013](#), calculations are made using the median for non-hazardous gate fee.

³⁰ From April 2015, the Scottish Government will be fully responsible for setting levels of taxation and for the revenue generated from the tax. The Office for Budgetary Responsibility (OBR) forecasts assume a tax receipt for Scotland of £105m in 2015/16.

³¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294470/Wales_Bi_Ii_Command_Paper_-_English.pdf

³² <http://www.london.gov.uk/priorities/business-economy/championing-london/london-finance-commission>

³³ Ibid2.

ANNEX 1 - Case study: Hackney

68. Hackney has a total housing stock of 105,342 properties comprising of 50,193 low rise/street level properties, 50,567 purpose-built blocks (estates) and 4,582 flats above shops.

Introduction of separate food waste collections in street level properties

69. A weekly food waste collection was introduced across all street level properties in 2007. Each household was provided with two blue bins – a 7 litre internal caddy and a 21 litre external bin. No liners were provided.
70. In September 2010, two food waste liner trials were carried out to the street level properties. Findings from these trials demonstrated that the provision of free liners resulted in an increase in performance, with participation increasing by 7.5 per cent, as well as a 24 per cent increase in the tonnage of food waste recycled. Results from the trials also found that communications alone (with no liners) proved to have a negligible impact.
71. In February 2012, the council launched a door knocking campaign. Residents were visited by trained door knockers, provided with a six month supply of liners, given the opportunity to order indoor and/or outdoor food waste caddies and respond to a questionnaire. Unfortunately, following the campaign, no significant increase in tonnage was recorded. Possible reasons for this included a significant delay in deliveries of the caddies ordered (due to problems with receptacle supply and suppliers).
72. In November 2013, Hackney revised collection day schedules so that each street level household received its residual, commingling and food waste collections on the same weekday. The communication material produced a spike in requests for food waste caddies and containers, resulting in an increase in collected food waste tonnage.
73. A participation monitoring project of all street level properties has been carried out in March 2014. The results show that the current food waste participation rates are at 31 per cent, with rates by collection round ranging from 18 per cent to 47 per cent. Following consultation with WRAP, a targeted food waste campaign was suggested with the aim of increasing participation rates to 40 per cent (with a 40 per cent rate being deemed to be excellent performance). In comparison, participation rates across the same properties for the dry recycling service showed a rate of 84 per cent, with WRAP recommending rates in excess of 80 per cent being excellent. In response to these recommendations, a borough-wide food waste communications campaign is being planned for autumn 2014.

Separate food waste collections in estates:

74. In 2007, parallel to the introduction of separate food waste collections across all street level properties, communal food waste bins were introduced in a small number of estates covering 5,000 properties. Initially the bins were emptied twice weekly due to concerns of overflowing food waste and hygiene but this proved not to be necessary and therefore the collection was reduced to once a week.
75. Funding from a range of sources (including LWARB and DCLG) enabled the estates' food waste service to gradually expand to 90 per cent of all estate properties, with a significant roll out to 30,000 properties in autumn 2013. At each

phase of the roll out, the residents were door knocked and provided with an internal 7 litre caddy. A six month supply of liners was provided to all properties in a blanket roll out which coincided with the 2010 street level food waste trials. There are plans to further expand this service to reach 100 per cent coverage by using new slim line communal food waste bins (140litre) more suited to the remaining smaller blocks, many of which have limited storage capacity.

76. Since March 2013, residents have been able to order receptacles and liners online through Hackney Council's website. This has enabled a much greater proportion of residents to access these services in a quick and efficient manner. Compostable liners are also available to collect from neighbourhood housing offices and a number of blocks. In addition, blanket deliveries have continued to all street level properties to date, through DCLG funding.
77. In addition to separate food waste collections, in 2010/11, five estates in Hackney set up community compost schemes. Food waste from these estates is composted on site and therefore diverted away from landfill without the need for a food waste collection.
78. Separate food waste collections for street level properties and estates were supported by a significant level of service publicity and communication, through leaflets, newspaper advertising, face-to-face engagement, website and social media. In addition a promotional service video³⁴ was produced in 2013, which has been used to inform and educate residents about how to use the service, why and end destinations.

Separate food waste collections in schools and businesses

79. Since 2013, Hackney has also been collecting food waste twice a week from a number of schools in the borough. This service is continually expanding due to its high performance (high food waste tonnage collected) of the schools currently on the service.
80. Food waste collections are also in operation for food waste from Hackney's large markets, namely Ridley Road. A food waste collection service is also being trialled for businesses in the borough.

³⁴ <http://www.hackney.gov.uk/recycling-bluebin.htm#U5GQRHJdVeg>