

David Palmer-Jones
Chair, UK Resources Council

By email

Wednesday 16th October

Dear David,

Re: Proposed Resources and Waste Sector Deal

We welcome the opportunity to provide comments and feedback on the proposed direction of the Sector Deal at this intermediate stage. Following quickly on from the Resources and Waste Strategy and the recent consultations on extended producer responsibility and a deposit return scheme, it provides a vision of what good will look like many years from now. However, whilst we understand the need to decouple from business as usual, the sector has needs that must be recognised and addressed now, in order for us to deliver the resources and waste strategy, and any proposed Sector Deal.

The London Environment Directors' Network (LEDNet) is a significant network of expertise and experience in this sector and was instrumental in engaging with DEFRA on their recent Resources and Waste Strategy; we also have strong links within the local government family, including with London Councils, the Local Government Association and ADEPT.

Local environmental protection is a critical local government role within the sector. To deliver on this we urgently need updated, relevant and agile policy and regulation. Specifically, we need more effective and joined up local powers to ensure that residents appropriately manage their waste, and to clamp down on individuals and organisations that criminally take advantage of the commercial opportunities this sector presents. Our greatest challenge is 'place', keeping it clean and tidy for more than 8.2m Londoners who benefit from and are responsible for efficient resources management from their doorsteps and shared bin areas.

In this letter (our response to the consultation) support for the direction and ideas put forward by the UK Resources Council is implied; our comments are restricted to reflecting what is missing. Local government's statutory role to protect the environment is evident in the document, but our presence and therefore experience, is missing. Local government is critical to the success of any Sector Deal. Beyond our direct role, we have a wider democratic mandate through our local councillors to our communities. We want to actively support the delivery of the Sector Deal as we represent Londoners and our places.

A sector plan to complete the move from waste to resource

We agree with and support the ambition of the UK Resources Council. Resources and waste need collaborative models across the value chain to boost the earning power and productivity of our

sector. One of the reasons it must be negotiated as a deal with Government is because of the fundamental change it represents to consumers and communities.

Our sector has learnt hard lessons about the potential for waste crime. Putting valuable commodities in the hands of all citizens makes it much more complex. We will need resources and powers to communicate, educate and act with resolve to prevent environmental damage to our communities. This change needs to start now.

Defining our sector

It will be vital to look wider than carbon and circular economy – much of local government, along with the UK Parliament, have now declared Climate Change Emergencies, and therefore the future of resources must be at forefront of any Sector Deal. In London, 26 boroughs have declared climate emergencies, with the majority committing to a target of zero carbon by 2030. As LEDNet, we believe that climate change presents a critical challenge to our core mandate and environmental protection and must be embedded into all our operations. The Sector Deal must also be embedded in the community and must protect the environment by, for example, eliminating the leakage of plastics and other secondary resources into the environment and improving air quality.

As waste becomes a commodity, enterprise will follow, and local government attention is needed to ensure a level playing field and strong environmental protection. Government agencies cannot adapt as businesses do, national powers must be created through legislation and a national agency will not be sufficient on its own; these national functions must therefore be supplemented by increased local powers to support the move from waste to resource, and these powers are needed now.

Stronger together

Important additional key indicators are cleanliness of the streets, air quality and the leakage of waste out of the system.

The five foundations for a sector deal

The Sector Deal does not quite capture all of the challenges that the sector needs to overcome in order to achieve the transition to a circular economy:

1. **Business Environment**: The document briefly mentions the policy and regulatory landscape. In reality, this area will need the most action. We recommend this is tackled as a fifth workstream, and we offer our significant expertise into the discussion. An appropriate case study is the big increase in fly-tipping, which will only get worse. The 'Green Circle' scheme could raise industry performance beyond regulatory compliance, but it cannot be used to tackle bad or non-compliant behaviour and introducing it as a requirement will push small innovative companies out of the market, which would be a significant loss. We do agree the scheme will create a competency and professional development framework against which to train and develop the workforce of the future.
2. **Place**: The increase in fly-tipping and waste crime demonstrates the impact of change on local communities and the importance of local regulatory and enforcement action. The future

we see is one where regulation is both national and local to protect the sector and ensure high standards are upheld, to create market ready investment conditions. Local government will need to adapt local waste plans, enterprise and industrial strategies to support the wider aims of the sector; we also want to work with our sector partners to secure the updates to the national planning practice guidance that are needed to enable excellence in place provision. This will only happen if local government has confidence that the impact on their communities will be positive.

3. People: It is not enough to ask that the local authorities receive funds for training core team members. To make this work, we all parts of the system to be equally valued as sector participants to ensure that investment barriers are quickly and safely overcome, creating investment-ready conditions and ultimately stimulating the transition to a resource efficient economy.

In conclusion, local government's ongoing involvement in the sector is the key to creating a transparent system that reduces delays in the project delivery timetable, ends regulatory uncertainty and facilitates the use of secondary resources, fuels etc. whilst maintaining high environmental standards. LEDNet welcomes the opportunity to provide a voice for local government in the development of the Sector Deal, and we would be keen to support a local government voice within the UK Resources Council going forward.

With kind regards,

Dan Jones
Chair, LEDNet



Victoria Lawson
Waste lead, LEDNet

