

# Briefing – Resources and Waste Strategy 2 years on

On 26<sup>th</sup> January 2021, Policy Connect hosted an event through the All-Party Parliamentary Sustainable Resource Group (APSRG) in partnership with Imperial College London's Transition to Zero Pollution Initiative to discuss the progress made since the publication of the Resources and Waste Strategy (the Strategy) just over 2 years ago. Over 140 participants were present at the online session, and speakers included parliamentarians, industry leaders, as well as representatives from academia and third sector organisations. The session aimed to understand what has been achieved since the Strategy's publication, where the challenges lie for the future, and what further steps are needed to promote resource efficiency.

The discussion was used to inform this briefing, but this was formulated solely by, and is only attributable to, Policy Connect.

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## The key recommendations of the briefing are:

- Ensure that the Environment Bill gains royal assent prior to the COP26 climate summit the UK will host in November 2021. This is crucial to ensure the credibility of the UK's COP Presidency and enable it to lead by example on environmental legislation.
- Give greater emphasis to reduction, reuse and remanufacturing, rather than simply design for recyclability. For example, the government should ban planned obsolescence and introduce longer product guarantees.
- Place emphasis on the broader problem of the single use culture in society, rather than just plastics. The Environment Bill should broaden the scope for single use product charges to be extended to other materials.
- Coordinate the EPR and the DRS across all four devolved nations to ensure compliance by both consumers, producer and processors.
- The Environment Bill should broaden the scope of the EPR to look at the life-cycle of a product.
- Moreover, the EPR should be extended to include a wider range of products to divert them away from landfill or incineration, such as white goods, textiles, carpets and mattresses, cigarettes and chewing gum.
- Government should set a target of net zero export of plastic packaging waste for 2030 at the latest. This can be achieved by setting split targets for plastic waste exports and domestic reprocessing, and gradually increasing the domestic target to 100% by 2030. In the meantime, the Government should go further than the proposed policy of a ban on plastic waste exports to non-OECD countries, and a set of quality assurance criteria should be created to determine which countries have the capacity to handle UK plastic waste exports in an environmentally responsible manner.
- Government should implement escalator targets in order for the recycling and material composition targets to match, ensuring that recycling targets set in the Strategy are not supported by the sufficient matching of supply and demand side for recycled materials.
- Government should clarify the mechanisms through which further materials can be added to kerbside waste collections, how they would support local authorities to fulfil their statutory duties and timelines should be given for textiles and e-waste to be added to the kerbside collection waste streams.

- Government should allocate funding for a communications campaign to encourage household recycling, reduce food waste, and cut down waste that goes to landfill.
- Government should attach binding targets to local authority recycling rates and the quality of service, alongside adequate funding to achieve them across the country.
- Commit investment to recycling technology to ensure that local authorities and waste management providers meet the increasing recycling requirements.  
In addition, investment should be made to scale up infrastructure in anaerobic digestion ensuring that food waste is used under the principles of the circular economy.
- Funding for the Joint Unit of Waste Crime should be reformed and allocated from the Environment Agency's budget.
- Measure the carbon content of resources and resource use per capita to help resource management.
- Government should improve data to track progress and increase enforcement.
- Put improving solid waste management on the COP26 agenda.
- Diversify the skills base in the waste management and environmental sector.
- Provide training in the hospitality sector to reduce food waste in order to meet Sustainable Development Goal 12.3 of halving food waste by 2030.
- Scale up special skills for recycling, repairing and remanufacturing to meet the targets of the circular economy. The recently launched Green Jobs Taskforce should also dedicate special attention to supporting the development of skills needed for the circular economy.

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### **The implementation of the Strategy has been slow and has been affected by delays of the Environment Bill**

Despite successes in certain areas, overall progress on the Strategy's implementation has been slow, affected by the setbacks due to COVID-19 and the UK's exit from the EU. Many of the Strategy's key objectives were supposed to get legal footing through the Environment Bill, however, the Bill was already delayed on account of the pandemic in March 2020 and only returned to the House of Commons in November. As announced on 26<sup>th</sup> January 2021, the Environment Bill was further delayed, affecting several 'key milestones' from the Strategy which are supposed to come into force in 2023 following consultations. These milestones include the roll out of the deposit return scheme (DRS), mandatory separate food waste collection, and the extended producer responsibility (EPR).

**Despite the delays, the government should ensure that the Environment Bill gains royal assent prior to the COP26 climate summit the UK will host in November 2021. This is crucial to ensure the credibility of the UK's COP Presidency and enable it to lead by example on environmental legislation.**

**In addition, government should release any necessary secondary legislation or other policy instruments related to the Environment Bill as early as possible to allow stakeholders sufficient time to prepare for their implementation.**

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### **The Strategy and the Environment Bill addresses the symptoms, rather than the underlying drivers of excessive consumption.**

While the Strategy has brought the concept of the circular economy into the mainstream, it does not take enough steps to de-couple growth from resource use, the ultimate goal of a circular economy. For example, the EPR currently only interprets the producer's responsibility in relation to end-of-life costs (recycling and disposal). But circular economy is guided by the principles of "designing out waste and pollution, keeping

products and materials in use, and regenerating natural systems”<sup>1</sup> and 80% of damage done to the economy could be avoided through better product design, re-use and recycling<sup>2</sup>.

In the Strategy, the government announced ambitious plans to double resource efficiency by 2050, while allowing resource use to increase with GDP growth. However, if we want to reduce the impact of resource use on biodiversity and water and meet our climate ambitions, we must reduce resource use<sup>3</sup>.

There is an opportunity for the government to capitalise on public support for addressing the climate change and polling has demonstrated support for greater recycling and a comprehensive DRS<sup>4</sup>, the government should be ambitious in its aims<sup>5</sup>.

**The government should therefore give greater emphasis to reduction, reuse and remanufacturing, rather than simply design for recyclability. For example, the government should ban planned obsolescence and introduce longer product guarantees. Alongside increasing resource productivity, the government should aim to reduce resource use and de-couple it from economic growth. This involves moving to a model of value creation that evaluates environmental and social impacts alongside economic considerations.**

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**The Strategy’s ambition to tackle single use plastics is a welcome step to address plastic pollution. However, placing the main emphasis on single use plastics without looking into other materials that also take part in powering the single use culture hinders the transition to a circular economy.**

The Strategy’s emphasis on single use plastics is a welcome step to tackle the challenge of plastics pollution.

However, it is important to highlight that while single use plastics are highly problematic, the issue has a much broader scope than plastics, namely the prevalence of the single use culture in society which hinders the transition to a circular economy.

The Strategy rightly emphasised the importance of the circular economy and has brought the concept into the mainstream of policy making. But when addressing the issue of single use items, it placed the main emphasis on single use plastics and this approach is reflected in the Environment Bill as well, with Clause 52 and schedule 9 in the Bill allowing regulations to be made for charging for single use plastic items. These regulations would only apply to goods that are single use, plastic, and supplied in connection with goods or services<sup>6</sup>.

Many single use items are now made from other materials such as wood or paper. Therefore, instead of eliminating the root cause of the problem, focusing purely on single use plastic would likely result in the shift toward the use of other materials as single use items.

**To enable the transition to a truly circular economy as the Strategy proposes, emphasis should be placed on the broader problem of the single use culture in society, rather than just plastics and the Bill should broaden the scope for single use product charges to be extended to other materials.**

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**The EPR needs a broader scope, and more holistic approach to resource management to yield the desired results.**

<sup>1</sup> [https://www.ellenmacarthurfoundation.org/circular-economy/what-is-the-circular-economy?gclid=CjwKCAiAgc-ABhA7EiwAjev-j1lGtEafCckvjKkaPqO9YRzmpgkad\\_3iiHBBMNKV\\_\\_rTynlTa4ux3hoCzuEQAvD\\_BwE](https://www.ellenmacarthurfoundation.org/circular-economy/what-is-the-circular-economy?gclid=CjwKCAiAgc-ABhA7EiwAjev-j1lGtEafCckvjKkaPqO9YRzmpgkad_3iiHBBMNKV__rTynlTa4ux3hoCzuEQAvD_BwE)

<sup>2</sup> <https://www.imperial.ac.uk/news/213013/imperial-experts-join-mps-industry-debate/>

<sup>3</sup> <https://publications.parliament.uk/pa/cm5801/cmselect/cmenvaud/220/22007.htm>

<sup>4</sup> <https://www.conveniencesstore.co.uk/legislation/new-poll-says-uk-consumers-favour-all-in-deposit-return-scheme/645474.article>

<sup>5</sup> <https://www.conveniencesstore.co.uk/legislation/new-poll-says-uk-consumers-favour-all-in-deposit-return-scheme/645474.article>

<sup>6</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-8824/>

As mentioned, the EPR's current focus is on end of life, but its success is dependent on better knowledge of product life-cycles to identify where resources slip down the waste hierarchy prematurely, illegal activities, and agents who can deliver desired policy outcomes<sup>7</sup>. A holistic approach would be complimented by outcome-based targets rather than weight-based targets; which may encourage the use of light plastics in packaging which are harder to re-use or recycle<sup>8</sup>.

There is also scope for the EPR to be extended to industries that produce resource-intensive products such as textiles<sup>9</sup>.

While the EPR attempts to address the cost of waste management, which is significant, and currently paid by the taxpayer, there must be mechanisms in place to prevent producers shifting the cost to consumers. There is support, from both industry stakeholders and the public, for the EPR (and the DRS) to have minimum services standards and a single database to track progress across all four devolved nations<sup>10</sup>.

**Therefore, the Environment Bill should broaden the scope of the EPR to look at the life-cycle of a product.**

**Moreover, the government should move away from the use of weight based targets towards outcome based targets to provide incentives to producers to use sustainable packaging.**

**The EPR should be extended to include a wider range of products to divert them from landfill or incineration, such as white goods, textiles, carpets and mattresses, cigarettes and chewing gum.**

**Furthermore, the aspiration of the EPR should be full cost recovery of waste management to drive producer behavioural change.**

**Finally, to achieve its aims, EPR (as well as the DRS) must be coordinated across all four devolved nations to ensure compliance by both consumers, producers, and processors.**

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**While the Strategy targeted to reduce UK's waste exports, implementation of highest possible ambition is yet lagging behind.**

The Strategy rightly included focus on reducing waste exports.

The Environment Bill gives the Secretary of State the power to prohibit or restrict the exportation of waste by destination, and in the Queen's speech (2020) a ban on the export of polluting plastic waste to countries outside of the OECD was set out.

While government commitment to ban the export of plastic waste to non-OECD countries was welcomed by the sector as an attempt to reduce the UK's waste exports, it was highlighted that 80% of exports are already taken to OECD countries, reducing the overall impact of the measure<sup>11</sup>. In addition, there are fears that purely focusing on OECD membership as guideline may damage legitimate operators in developing countries, while at the same time the capacity within certain OECD countries to deal with the UK's plastic waste exports is questionable.

Although the approach to set export criteria on OECD membership was already problematized given these concerns, the move was brought into further controversy by the 'Brexit loophole'. While the EU has banned the shipment of unsorted plastic waste into non-OECD countries from 1 January 2021, UK regulation has so

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<sup>7</sup> <https://repic.co.uk/repic-joins-industry-leaders-in-debating-the-resources-and-waste-strategy-two-years-on/>

<sup>8</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819467/epr-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819467/epr-consult-sum-resp.pdf)

<sup>9</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1952/1952.pdf>

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819467/epr-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819467/epr-consult-sum-resp.pdf)

<sup>11</sup> <https://www.letsrecycle.com/news/latest-news/industry-welcomes-most-of-environment-bill/>

far lagged behind on this, allowing waste to be exported to non-OECD countries with ‘prior informed consent’<sup>12</sup>.

In addition, any ban on waste exports should be coupled by steps to eliminate all avoidable waste in the first place, as well scaling up the UK’s recycling and reprocessing infrastructure. As Policy Connect’s Plastics Packaging Plan emphasised, government should aspire to ceasing the export of waste to countries with poor environmental standards and seek to create a thriving UK recycling and reprocessing market in order to reach a circular economy<sup>13</sup>.

**Therefore, Government should set a target of net zero export of plastic packaging waste for 2030 at the latest<sup>14</sup>. This can be achieved by setting split targets for plastic waste exports and domestic reprocessing, and gradually increasing the domestic target to 100% by 2030<sup>15</sup>.**

**In the meantime, the Government should go further than the proposed policy of a ban on plastic waste exports to non-OECD countries, and a set of quality assurance criteria should be created to determine which countries have the capacity to handle UK plastic waste exports in an environmentally responsible manner.**

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### **The recycling targets set in the Strategy are not supported by the sufficient matching of supply and demand side for recycled materials.**

The Strategy put forward to have at least 65% of municipal waste by weight recycled by 2035.

If designed properly, the new EPR, the DRS and the proposed more consistent waste recycling streams will drive up the supply of the supply of recyclable materials. In order to reach the 65% recycling target set in the Strategy, however, the supply side needs to be matched with demand for recycled materials. The Strategy outlined the introduction of a tax on plastics with less than 30% recycled content and as a positive step towards the implementation of the Strategy, HMRC announced the introduction of the tax from 2022. While this is a welcome measure to boost demand for recycled materials, in itself is not enough to stimulate the level of demand needed to reach the 65% target.

**Therefore, government should implement escalator targets in order for the recycling and material composition targets to match.**

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### **Ambitious targets for recycling and waste management are not backed up by the right investment or infrastructure for local authorities to achieve them.**

Part 3 of the Environment Bill concerns resources and waste, including standardising kerbside waste collection for five waste streams: glass, metal, plastic, paper and card, food and garden waste. This proposal was included in the Strategy and has since gone to consultation which was welcomed by stakeholders. However, questions remain about implementation, including how further materials will be added to the core streams, and whether greater recycling rates will actually be achieved through the introduction of non-binding performance indicators of recycling services for local authorities.<sup>16,17</sup>

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<sup>12</sup> <https://www.theguardian.com/environment/2021/jan/12/loophole-will-let-uk-continue-to-ship-plastic-waste-to-poorer-countries>

<sup>13</sup> [https://www.policyconnect.org.uk/sites/site\\_pc/files/report/1184/fieldreportdownload/raa34287ipcizerowasterepor tidjliwebsinglepages.pdf](https://www.policyconnect.org.uk/sites/site_pc/files/report/1184/fieldreportdownload/raa34287ipcizerowasterepor tidjliwebsinglepages.pdf)

<sup>14</sup> Ibid.

<sup>15</sup> Ibid

<sup>16</sup> <https://www.gov.uk/government/consultations/waste-and-recycling-making-recycling-collections-consistent-in-england/outcome/consistency-in-recycling-collections-in-england-executive-summary-and-government-response>

<sup>17</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

The Environmental Audit Committee received confirmation from the Minister for the Environment, Rebecca Pow MP, that further waste streams can be added to kerbside collection through secondary legislation, such as e-waste – of which the UK is the second highest generator of per capita in the world.<sup>18</sup> However, while secondary legislation can be used to add further waste streams regional disparities in recycling may arise again according to local authority variances in funding and processing facilities.

**Therefore, the Government should clarify the mechanisms through which further materials can be added to kerbside waste collections and how they would support local authorities to fulfil their statutory duties and timelines should be given for textiles and e-waste to be added to the kerb-side collection waste streams<sup>19,20</sup>.**

**In addition, the Government should allocate funding for a communications campaign to encourage household recycling, reduce food waste (70% of which occurs within the home), and cut down waste that goes to landfill.**

**Government should attach binding targets to local authority recycling rates and the quality of service, alongside adequate funding for them to be achieved across the country.**

**Investment needs to be committed to recycling technology, if local authorities and waste management providers are to meet these increasing recycling requirements.**

**In addition, to ensure that any food waste that is left is used under the principles of the circular economy, investment should be made to scale up infrastructure in anaerobic digestion.**

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### **Strengthen reporting and enforcement to reduce waste crime and reach targets.**

Waste crime currently costs the UK an estimated £600 million<sup>21</sup>. Referring to ‘anything that intentionally breaks the law relating to the handling and disposal of waste’<sup>22</sup>, waste crime is a complex problem and the Strategy proposed a new approach of prevent, detect, deter it.

A key proposal of the Strategy was the creation of the Joint Unit for Waste Crime (JUWC) which was established in 2020<sup>23</sup> and is comprised of: the Environment Agency (EA), Natural Resources Wales, the Scottish Environment Protection Agency, the Northern Ireland Environment Agency, the police, the National Crime Agency, HM Revenue & Customs (HMRC) and the British Transport Police. The new JUWC helps tackle waste crime with a new approach, exploring the links it has with modern slavery, money laundering, or drugs. This is complemented by a regional and local team of waste engagement officers. They are now conducting over 20 operations<sup>24</sup>.

However, funding of the JUWC is still a key concern.

**Echoing the 2018 Waste Crime Review, the JUWC’s funding should be reformed and allocated from the Environment Agency’s budget<sup>25</sup>.**

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<sup>18</sup> <https://committees.parliament.uk/publications/3675/documents/35777/default/>

<sup>19</sup> ibid

<sup>20</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1952/1952.pdf>

<sup>21</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

<sup>22</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

<sup>23</sup> <https://www.gov.uk/government/news/clock-is-ticking-for-waste-criminals-as-new-taskforce-launched>

<sup>24</sup> <https://www.gov.uk/government/news/successful-first-year-for-waste-crime-taskforce-despite-pandemic>

<sup>25</sup> <https://www.gov.uk/government/publications/serious-and-organised-waste-crime-2018-review>



Furthermore, waste reporting is notoriously insufficient. While the metrics published to measure progress against are ambitious and move towards measuring material consumption per capita, they still allow consumption to increase<sup>26</sup>.

**To help resource management, the carbon content of resources should be measured, as well as resource use per capita.**

The mandatory digital recording and tracking of waste is important for identifying and enforcing against waste crime and is also essential for a circular economy. The new statutory cycle of target setting is welcome which includes that monitoring, planning and reporting with legally binding targets for resources and waste is to be reviewed every five years. Yet there are concerns that without accurate data, targets and reporting would not be effective. This is coupled with the fact that and that the newly created Office for Environmental Protection (OEP) currently lacks a statutory base to act as a domestic watchdog as the Environment Bill has not become law yet. The full life-cycle of products attached to the EPR need to be understood to identify opportunities for 'leakage' or illegal activities.

**Government should improve data to track progress and increase enforcement.**

**Moreover, the OEP should urgently be provided with a statutory base.**

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**The UK has made progress on the global aspects of the Strategy, however, further work is needed to strengthen the UK's international leadership.**

Chapter 6 of the Strategy focused on the UK's role on the global stage. This is summarised as working 'internationally to increase the extent and improve the quality of waste management, particularly in developing countries, including through UK aid'<sup>27</sup> which aligns well with the global waste targets embedded in the Sustainable Development Goals (SDGs).

Brexit and COVID-19 makes it difficult to evaluate the UK's performance in this area. While the UK has achieved progress, further work is needed to strengthen the UK's leadership in this field, in particular ahead of COP26.

Most government action has focused on plastics, including the Basel Convention ban on the export of mixed plastics waste, the Commonwealth Clean Oceans Alliance, a wider Global Ocean Alliance, the Global Challenges Research Funding of £20 million for five collaborative research projects on reducing the impact of plastics waste, as well as the proposed £30 million circular economy for plastics programme.

**It is important that government keeps delivering this funding, despite the merger of the Department for International Development and the Foreign & Commonwealth Office, as well as the recent cuts to the UK aid budget.**

A further opportunity to strengthen the UK's leadership is via addressing the neglected area of the widespread open burning of waste which was brought to attention by a recent report of Engineering X<sup>28</sup>. Imperial College London's research estimated that the black carbon emissions from this constitutes between 2-10% of global carbon dioxide equivalent emissions<sup>29</sup>. Tackling this area would be a clear 'low hanging fruit' for climate change mitigation whilst improving public health.

**Therefore, the UK should put improving solid waste management, in particular in developing countries, firmly on the COP26 agenda.**

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<sup>26</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907161/resources-and-waste-strategy-evaluation-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907161/resources-and-waste-strategy-evaluation-plan.pdf)

<sup>27</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907161/resources-and-waste-strategy-evaluation-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907161/resources-and-waste-strategy-evaluation-plan.pdf)

<sup>28</sup> <https://www.raeng.org.uk/publications/reports/seel-global-review>

<sup>29</sup> <https://www.sciencedirect.com/science/article/abs/pii/S1352231019304388>

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**To implement the transition to circular economy the Strategy sets out, it is important that government addresses the skills gap which currently hinders this.**

To achieve the transition to a circular economy and deliver the objectives of the Strategy, it's very important the government dedicates special attention to addressing the skills gap and ensures through cross-departmental collaboration that the waste and resources sector is appropriately supported regarding skills to be able to deliver against the objectives of the Strategy.

**Greater importance should be given to diversifying the skills base in the waste management and environmental sector.**

**Moreover, priority needs to be given to training the hospitality sector to reduce food waste in order to meet SDG 12.3 of halving food waste by 2030.**

**If the UK is to transition to a circular economy, special skills for recycling, repairing and remanufacturing need to be scaled up.**

**Therefore, the recently launched Green Jobs Taskforce should also dedicate special attention to supporting the development of skills needed for the circular economy.**

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