



A London Councils briefing

The Mayor's Municipal Waste Management Strategy

Introduction

On 18 November 2011 the Mayor of London published his **Municipal Waste Management Strategy (MMWMS)** following nearly two years in development.

The Greater London Authority (GLA) Act 1999 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 GLA Act 2007 enhanced the Mayor's powers, requiring waste authorities to 'act in general conformity with' the Mayor's strategy in delivering their functions. In light of the implications of the strategy's policies and proposals for London waste authorities, London Councils has actively engaged with the GLA at various levels – from officers to the Mayor – in the process of developing this strategy.

London Councils responded to both the Assembly draft and the public consultation draft of the strategy, raising a number of issues and concerns. Our engagement through these channels and in meetings and discussions with the GLA has obviously shaped the final version of the Mayor's strategy. This is welcome.

The strategy in summary

The four objectives

The strategy sets out four objectives for the Mayor's plans for managing municipal waste in London:

- Provide Londoners with the knowledge, infrastructure and incentives to change the way

they manage municipal waste in order to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible.

- Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste.
- Unlock the massive economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of low carbon energy from waste.
- Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.

The six key targets

The Mayor has set his own, more ambitious, targets for the management of municipal waste in London. The Mayor has justified setting more stringent (than national) targets in London on the grounds that the need to reduce the amount of municipal waste produced in the capital is more acute and that the shift away from landfilling London's waste needs to be driven at a faster pace given the projections for available landfill capacity to 2025. The targets are:

- To achieve zero municipal waste direct to landfill by 2025.

- To reduce the amount of household waste produced from 970kg per household (p/h) in 2009/10 to 790kg p/h by 2031 (i.e. a 20 per cent reduction p/h).
- To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031.
- To recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031.
- To cut London's greenhouse gas emissions through the management of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately:
 - 545,000 tonnes of CO₂eq in 2015
 - 770,000 tonnes of CO₂eq in 2020
 - One million tonnes of CO₂eq in 2031.
- To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing. This is estimated to be possible for about 40 per cent of London's municipal waste after recycling or composting targets are achieved by 2031.

Commentary on the targets

London Councils' Transport & Environment Committee (TEC) set out an aspiration for zero waste to landfill in a 2008 position statement so this is an aspiration that we share. A key barrier to achieving zero waste direct to landfill is public awareness and perceptions, and consumer behaviour. There are common messages that the Mayor, London Councils and waste authorities can disseminate to raise awareness and encourage required behaviours with regards to waste minimisation, reuse and recycling (quantities and quality).

The Mayor's MWMS recognises the downward trend for household waste arisings in London. However, London Councils believes that the evidence linking cause and effect is not conclusive, making the setting of a 20 per cent reduction target rather spurious as it is unclear what exactly needs to be done to meet this target. What is clear is that the economic downturn has had an impact on waste generation. It is less clear to what extent other proactive interventions by waste

authorities can accelerate this trend and what the cost of these interventions could be over the life of the strategy if the target is to be achieved.

London Councils supports the Mayor's focus on waste minimisation. However, the strategy does not sufficiently assess the potential conflicts between this aspiration and the associated targets and the other targets associated with interventions at other levels of the waste hierarchy. Higher targets for recycling and composting invariably lead to more waste being collected e.g. compostable waste which could be dealt with at source. Conversely, success in meeting waste minimisation targets is most likely to cause both tonnages and percentages of recyclable and compostable waste to fall.

The cost of expanding recycling services to capture additional tonnages in many parts of London is now prohibitive as the areas for improvement are the most difficult. Setting recycling and composting targets higher than national targets misses this point and also fails to acknowledge that many London boroughs do not have access to large tonnages of green garden waste even if they were minded to collect these.

The six policies

To achieve the Mayor's objectives and targets, the strategy outlines six policies, each containing a number of proposals.

Policy 1: Informing producers and consumers of the value of reducing, reusing and recycling municipal waste

This policy concentrates on: supporting London-wide engagement to promote the 'reduce, reuse and recycle' message; reducing the amount of municipal waste entering the waste stream; and tackling the barriers to providing effective reuse services. Targets one and three support this policy.

Policy 2: Reducing the climate change impact of London's municipal waste management

This has proved to be the most controversial of the Mayor's six policies as it proposes an emissions performance standard (EPS) for London's municipal waste activities and sets a minimum equivalent carbon dioxide (CO₂eq) performance for energy generation from London's municipal waste, known as a 'carbon intensity floor' (CIF).

The emissions performance standard (EPS)

The Mayor has developed a lifecycle CO₂eq EPS for London's municipal waste management to work towards achieving. The final strategy states that the Mayor will work with waste authorities to put London on a path for its municipal waste management functions to collectively achieve the Mayor's EPS.

The EPS has been set to achieve the greatest climate change mitigation benefits practicable from London's municipal waste at least cost. The GLA will monitor London's municipal waste management performance against the EPS annually using data from [WasteDataFlow](#).

The carbon intensity floor (CIF)

Waste authorities that are considering options for generating energy from waste will need to demonstrate how their preferred solutions will meet the Mayor's CIF for energy generation from London's municipal waste, or demonstrate what steps are in place to meet it in the near future.

Policy 3: Capturing the economic benefits of municipal waste management

The strategy estimates that London could save £90 million a year if municipal waste was managed in the optimal way and states there is a massive opportunity for London's waste authorities to share in these savings. This policy refers to the London Waste and Recycling Board's (LWARB) four year programme (2011-2015) to identify and implement efficiencies in London's municipal waste management, and to secure investment in London's municipal waste management infrastructure.

Preparing London to manage all its waste (including commercial and industrial waste, and construction demolition and excavation waste) in the most carbon efficient and economically beneficial way could generate approximately 1,260 green-collar jobs and contribute £52 million of direct Gross Value Added (GVA) to the economy each year to 2025.

Policy 4: Achieving high municipal waste recycling and composting rates resulting in the greatest environmental and financial benefits

This policy is supported by target four and includes proposals to ensure that both waste authorities and the waste industry provide recyclable material to the

processing and treatment markets. This policy also refers to proposals to provide 'on-the-go' recycling bins across London.

Policy 5: Stimulating the development of new municipal waste management infrastructure in London, particularly low carbon technologies

The Mayor, through LWARB, will actively support the development of municipal waste management infrastructure in London, and in particular the use of low carbon technologies.

Policy 6: Achieving a high level of street cleanliness

This policy contains a number of proposals for ensuring that London's streets are litter free, particularly during the 2012 London Olympic Games.

Commentary on the waste policies

London Councils commends the move towards carbon-based outcomes and acknowledges that the EPS and the carbon intensity floor are innovative approaches to the way London seeks to manage its waste in the future. London Councils also welcomes a focus on climate change in waste management practices and supports a move away from tonnage-based targets towards carbon-based outcomes.

The Mayor had originally set his EPS as a 'target' for London's waste authorities. The confirmation in the final strategy that the EPS will instead be a 'benchmark' for London's waste authorities is a significant win for London Councils. This is a sensible way forward that ensures London's waste authorities receive a clear message in terms of direction of policy but are not being required to meet conflicting performance regimes when set against a national performance framework of weight-based targets.

The wording of the policy has also been changed to explicitly state that, where the CIF is not met, authorities will need to demonstrate what steps are in place to meet it in the near future. This is also welcome and reflects some movement from the Mayor on this issue. London Councils consistently argued that the CIF should be given the same status as the EPS now has in the strategy – setting the tone for the future without putting waste authorities in the situation where again they are subject to conflicting performance objectives.

Taken together, these concepts place London's waste authorities under a more stringent framework for waste management compared with the rest of England, who are only required to meet tonnage-based targets.

London Councils is working with LWARB, waste authorities and others through the LWARB Efficiencies Programme to examine the need for model contracts and joint approaches as appropriate. London Councils and LWARB are currently exploring the potential for pan London consortia contracts for the sale of recyclables.

London Councils is currently working with boroughs and other partners to deliver some of the proposals outlined under Policy 6 including a London-focused Chewing Gum Action Group Campaign in 2012, Capital Clean-up, and work on packaging waste, including plastic bags.

The waste hierarchy

The public consultation draft of the MMWMS set out the Mayor's own waste hierarchy, which distinguished between the treatment of waste through energy generation producing electricity, and using waste heat and treatment of unsorted waste through energy generation producing electricity only. Following strong representations from London Councils, this has now been replaced with Defra's (Department for Environment, Food and Rural Affairs) waste hierarchy. London Councils welcomes this concession as it avoids further confusion, removes the potential for waste infrastructure investments to be held up, and ensures that London is working to the same hierarchy as the rest of the country.

Implementing the strategy

The Mayor has published an 'implementation plan' alongside this strategy, which sets out how the strategy's policies and proposals are to be implemented. The Mayor will also publish an annual monitoring report on the progress of the implementation of his policies and proposals.

However, as the strategy notes, it is London's waste authorities who are ultimately responsible for implementing the strategy, as they are statutorily responsible for the delivery of local waste services and for the procurement of the necessary waste treatment capacity.

The majority of actions in the implementation plan are shown as starting in 2010 and London Councils and London boroughs are already working with the Waste and Resources Action Programme (WRAP) on issues such as a waste reduction and food waste.

London Councils will be working with boroughs and waste authorities to ascertain the implications for individual boroughs and waste authorities of meeting the collective targets in the strategy.

The target with potentially the most significant impact for individual authorities is the carbon intensity floor (CIF). London Councils will work with the Mayor, Greater London Authority and those boroughs and waste authorities considering energy from waste facilities, to ensure that agreed solutions will not be penalised by the Mayor for not meeting the CIF.

