Planning a sustainable future for the City of London

WASTE STRATEGY 2013-2020
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The Right Honourable The Lord Mayor of London Fiona Woolf

The City of London is a unique place, where centuries of tradition are combined with a thriving modern business community, millions of visitors and a relatively small residential population. Providing services for all of these people and dealing with the rubbish they produce to ensure that the City maintains its high standards of cleanliness have always provided us with a significant challenge.

This challenge has progressed from an era when the focus was on collecting everything and disposing of it as quickly and efficiently as possible, through the early days of recycling to where we are today; where sustainability and the responsible management of waste is at the very heart of what we do.

The City of London has a strong track record in sustainable waste management, being the first London Authority to sort and recycle waste from our streets; and now, more recently we were able to declare that we send zero waste directly to landfill. The City of London also operates an awards scheme for business of all sizes, the Clean City Awards, which promotes and rewards best practice in sustainable waste management and has now been running successfully for 20 years.

This waste strategy contains the framework necessary to build on these successes and continue to provide excellent levels of service to our residents and visitors. It also highlights how we will use our influence and expertise to encourage businesses within the Square Mile to take the right decisions to responsibly manage their waste.

I very much welcome our new Waste Strategy which reflects the significant strides we have made in recent years through sending zero waste directly to landfill.

It also takes into account the heightened awareness of businesses and residential customers across the City and the importance these customers now place on protecting the environment.

This awareness is demonstrated by the continued improving rates of recycling and reduction in overall waste. However, much more can still be done. Accordingly our focus will be on minimising waste and maximising recycling and reuse through setting clear, stretching targets to achieve this.

Chairman of Port Health & Environmental Services Committee, John Tomlinson
This Strategy update will seek to lay out a vision for how the City of London will deal with its waste from 2013 until 2020. The focus of this update has been to make it a working document which will feed into specific objectives, setting ourselves stretching targets to ensure the City of London remains at the forefront of sustainable waste management well into the future.
2.1. Purpose of the Strategy

The City of London Corporation’s previous Waste Strategy was developed in 2008 for a 12 year term to 2020. Since its development, there have been a number of important changes within the City and across the waste management industry in general.

These changes include:

- The outcome of the Government’s review of waste policy by the Department of Environment, Farms and Rural Affairs (Defra) in 2011.
- The start of the City’s new contract for domestic waste collection and street cleansing services (October 2011).
- The transfer of the commercial waste business to our contractor in October 2011.
- The Riverside Energy from Waste (EfW) facility at Belvedere becoming fully operational (October 2011) and is now accepting all the residual waste we collect.
- The market value of recyclable materials (in general) has improved at present but remains variable.

This strategy update has been developed to ensure that our waste and recycling policies and objectives are aligned to these changes in addition to any other pertinent legislative changes since 2008. This Strategy update uses the baseline as 2011-2012, and has at its core, achievable objectives, to be delivered through a clear action plan.

This strategy update describes how we will directly manage the waste we are responsible for collecting in the City (referred to as Local Authority Collected Municipal Waste - LACMW, which includes household waste and street waste arisings) and how we intend to influence the management of a range of other waste types produced in the City. These ‘other’ waste types include commercial and industrial waste (C&I waste) and construction, demolition and excavation waste (CD&E).

This updated Waste Strategy addresses the following questions:

- Where are we today? – the current situation regarding waste management.
- Where do we want to get to and when? – the objectives for how waste will be managed in the future and how waste management is planned for in light of other relevant strategies and policies.
- What do we need to do to get there? – the actions which are planned to achieve the objectives

The Strategy update consists of four main parts:

- An outline of the context and influences within which waste management services are delivered
- The Strategy Vision (Aims and Objectives)
- The details of how we will meet the challenge through delivery of the different waste and recycling services
- How we intend to measure and evaluate the progress against the strategy

In addition, a three-year rolling action plan and a supporting annual detailed action plan will sit alongside this strategy update, providing the outline of how the strategy will be delivered. The delivery of projects against the updated strategy’s objectives will span different departments that have their own internal objectives. This strategy update will therefore provide a structure for decision making on the projects and programmes to be include in the action plans.

This updated strategy document is intended to run until 2020, during which time it is planned to be reviewed every three years. It will only require revision if:

- New external drivers (e.g. legislation, regulation) render it fundamentally ‘out of date’
- The three year and annual action plans have become inconsistent (in terms of what they are trying to deliver) with the content of this strategy.

The action plan will be reviewed annually and updated, and a new annual action plan will be developed each year.
2.2. Strategy Scope

2.2.1. Which waste streams are included

All waste streams produced in the City are considered within this updated strategy. The level of influence we have on how these waste streams are managed varies depending on where the waste is produced (the source).

The majority of waste produced in the City originates from businesses and construction companies that operate in the Square Mile. Since October 2011, when we transferred our business/commercial waste and recycling collection services to our contractor, we have no direct control on how these materials streams are managed. Although this is the case, through this strategy we aim to influence City businesses by delivering initiatives such as the Clean City Awards and the Sustainable City Awards, as well as through partnership work across different departments within the City of London Corporation including the Department of Built Environment, City Surveyors, Open Spaces, Parks and Gardens, Highways and Markets.

As we are responsible for the collection, processing and disposal routes of all waste streams (recycling, organic waste, bulky waste, clinical waste and refuse) produced by City residents and the street sweeping and litter cleared from the City’s street, we can control how these waste streams are managed. For this reason this updated Waste Strategy focuses more heavily on the management of these waste streams.

2.2.2. Key stakeholders

This updated Strategy has been developed by the City of London Corporation, involving a range of relevant internal departments and decision makers. The process has involved internal and external consultation, providing an opportunity for views to be sought from the wider community.

This Strategy is aimed at informing and guiding a range of relevant stakeholders, including:

- City of London Residents (permanent and temporary, including landlords)
- City of London Elected Members
- City of London businesses and key business leaders
- The Greater London Authority (GLA)
- Department for Environment, Food and Rural Affairs (Defra)
- The Environment Agency (EA)
- Neighbouring London Boroughs and Waste Disposal Authorities
- Registered Social Landlords
- Existing Waste Contractors
- City of London Corporation internal departments
- English Heritage
- Natural England
- Visitors to the City
- Key delivery partners: contractors and suppliers
- City of London staff
- Waste and Resources Action Programme (WRAP)
- London Waste and Recycling Board (LWARB)

2.3 Consultation outcome

As part of the development of the updated waste strategy, we consulted with all key stakeholders listed in 2.2.2, between 27 February and 26 May 2013. The consultation consisted of a session with Members, an online survey open to all stakeholders, roadshows, social media, information on the front page of our website, articles in newsletters and a workshop held for interested businesses. City residents were also notified of the consultation via information contained in their annual council tax bill. We also wrote to key stakeholders in relevant government departments and all of London’s local authorities, to provide them the opportunity to provide feedback and comment on our draft strategy.

The online questionnaire, completed by 36 stakeholders, focused on the nine objectives which were developed to influence how we will manage waste for the next seven year period (2013-2020). The results of the consultation are provided in detail in Appendix 8 and the key outcomes are provided in this section.

Overall, the consultation provided a very positive response from key stakeholders, City of London staff, businesses and the general public. The feedback from the consultation consists of a multitude of suggestions, including ideas surrounding service provision, difficult waste streams, littering and communication. As part of delivering this strategy, we will develop an action plan that addresses the key suggestions. One main outcome of the consultation was the desire for more effective communication with residents, businesses and visitors to the City, which includes greater transparency and information provision.

Businesses were particularly keen to see better guidance on how to manage their waste and recycling, including best practice, successful case studies and increased engagement through workshops and face-to-face visits. Residents emphasised the need for information to increase understanding of what can and cannot be recycled, the value of recyclates and what happens to their recycling once it is collected.

From the online survey, it was clear that waste reduction (Objective 2), followed by recycling and composting (Objective 4) were of the highest perceived level of importance for respondents. This was followed by reusing materials (Objective 3) and zero waste to landfill (Objective 6). The results of this will be taken into account during the development of our action plan.

As part of the consultation, respondents were given the opportunity to comment on the proposed objectives. Most responses focused on ‘Objective 7: Responding to Climate Change’, suggesting it required reviewing in order to address broader carbon impacts of waste management, to reflect this we will ensure it is aligned with the Mayor of London’s Municipal Waste Management Strategy and linked to air quality.

The Clean City Awards Scheme was a priority area for consultation and was directly addressed through a facilitated workshop with businesses operating in the City of London. This engagement resulted in the identification of some key suggestions which would require us to reassess the way in which we act as a facilitator to support businesses to ‘do the right thing’, through providing more information, best practice as well as a way that businesses can monitor and record what they are doing.

2. Organic waste can be defined as waste material of plant or animal origin, in terms of household collections this refers to food waste and small amounts of garden waste.
3.1. Local Context

There is a wide range of indicators and measurements that are used to describe the characteristics of a given population. For this Waste Strategy we have chosen to look at housing numbers and type, deprivation, ethnicity, religion and transience. These indicators are measured by the Office of National Statistics (ONS) for all areas of England.

This section provides a summary of these local aspects with respect to the makeup of the City that can have an influence on the waste arising across the City and how we manage it.

3.1.1. Unique characteristics

The area that the City of London Corporation is responsible for comprises of just over one square mile and is often referred to as the “Square Mile”. Within this area there are approximately 9,000 residents, 340,000 workers per day and 24 million people visiting the area every year. The City is the only local authority in the country in which the number of workers significantly outnumbers the residents and therefore, to be truly representative of its population, offers a vote to City organisations so they can have their say on the way the City is run.

The City of London Corporation, as the world’s oldest continuously elected local government, is a unique institution with a diverse range of roles and responsibilities. We provide a dedicated service to the Square Mile, from essential infrastructure maintenance to strategic economic development. We also have our own dedicated police force, which is the national lead force for economic crime.

In addition to the functions of a local authority and police force, we provide a range of specialist services to the business City and to our residential and daytime populations. Many of these are of wider regional and national importance and directly affect people outside of the City. We support and fund flagship cultural organisations such as the Barbican Centre and the Guildhall School of Music and Drama, manage and protect over 10,700 acres of open space outside of the City, own and operate three of London’s leading wholesale food markets and run London’s largest grant-giving charity, The City Bridge Trust. We also play a leading role in supporting and promoting the City as the world leader in international finance and business services and promote the interests of the financial services industry in the City and the UK.

At the City of London Corporation we have always tried to foster trade and commerce, and to maintain our own longevity and stability, resulting in the need to look after a great deal of national heritage. Maintaining this heritage is one of our key roles. We are responsible for looking after major facilities including Tower Bridge, the Museum of London, and the London Metropolitan Archives, to many smaller monuments; the Corporation makes sure that important historic resources continue to serve the wider public.

One of the oldest surviving (since 1237) traditional ceremonies still in existence today is the granting of the Freedom of the City of London. The medieval term ‘freeman’ meant someone who was not the property of a feudal lord but enjoyed privileges such as the right to earn money and own land. Town dwellers who were protected by the charter of their town or city were often free – hence the term ‘freedom of the City’.

Today the Freedom is largely symbolic but it remains a unique slice of London history. From the Middle Ages, the Freedom was the right to trade, enabling members of a Guild or Livery to carry out their trade or craft in the Square Mile. A fee or fine would be charged and in return the Livery Companies would ensure that the goods and services provided would be of the highest possible standards. In 1835, the Freedom was widened to incorporate not just members of Livery Companies but also people living or working in the City or there was a strong London connection. The Freedom of the City today is still closely associated with membership of the City Livery Companies.

3.1.2. Residents and household types in the City

As mentioned above, the City of London Corporation is unique in terms of its demographics as it has a very small residential base in comparison to the number of people that work in the Square Mile.

In relative terms, there was a large decrease in residential population between 1921 (over 19,000) and 1971 (dropped to just over 4,000). Population levels then remained relatively stable through to 1991. An increase in population was then seen between 1991 and 2001. This was mainly due to the local authority boundary review, which resulted in the estates of Golden Lane and Mansell Street being incorporated into the City of London from neighbouring boroughs. The residential population then marginally increased from 7,200 in 2001 to 7,400 in 2011. Table 1 summarises the key population statistics for the City of London in 2011, as provided by the 2011 census.
### Table 1: Key demographic statistics

<table>
<thead>
<tr>
<th></th>
<th>Count (27 March 2011)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Census of Population:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Households occupied by at</td>
<td>4,400</td>
<td>Office for National Statistics © Crown</td>
</tr>
<tr>
<td>least one usual resident</td>
<td></td>
<td>Copyright 2012</td>
</tr>
<tr>
<td>Persons as household residents</td>
<td>7,200</td>
<td></td>
</tr>
<tr>
<td>Persons Communal Establishment residents</td>
<td>200</td>
<td></td>
</tr>
<tr>
<td>Census of Population:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Resident Population Count per</td>
<td>1.68</td>
<td>Office for National Statistics © Crown</td>
</tr>
<tr>
<td>Household</td>
<td></td>
<td>Copyright 2012</td>
</tr>
<tr>
<td>Council Tax</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- of which registered as Second Homes</td>
<td>6,100</td>
<td>City of London, Council Tax</td>
</tr>
<tr>
<td>- Non Second Homes</td>
<td>1,400</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4,700</td>
<td></td>
</tr>
<tr>
<td>Local Land and Property Gazetteir</td>
<td>6,050</td>
<td>City of London Local Land and Property Gazetteir</td>
</tr>
</tbody>
</table>

Source: Office for National Statistics © Crown Copyright 2012

As outlined in Table 1, the census data shows that 7,400 residents live in the City on a permanent basis. This does not take into account the estimated 1,400 residents living in second homes in the City. It is therefore likely that on any given day the population in the Square Mile is closer to approximately 8,800, living in 6,050 households.

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4. The Census of Population is a decennial count of all people and households in the UK, undertaken by the Office for National Statistics (ONS) in England and Wales, the government department that provides statistical services; the latest Census of Population was conducted on 27th March 2011.
As a central business location, the City of London is characterised by housing accommodation that is predominantly flats. Many of these flats are small scale in terms of accommodation size and suitable for use as second homes by a population base that would be defined as 'visitors' (not counted in the resident population). Figure 1 illustrates the spatial distribution of housing units across the Square Mile. About half of our residents live on the Barbican estate, with the remainder living on smaller estates, low-rise flats and individual flats above office developments.

Figure 1: Housing distribution in the City of London Corporation
The Index of Multiple Deprivation (IMD) is a measure of deprivation in England. There are areas within the Square Mile with widely divergent deprivation levels:

- Areas around the Barbican are within the 20% least deprived areas in England.
- The Mansell Street and Petticoat Lane area is the most deprived in the City and falls in the 40% most deprived areas in England.

The ethnic groups in the City are summarised as:

- White 85%
- Asian or Asian British 7%
- Chinese 4%
- Black or Black British 3%
- Other 1%

Migrants are defined by the ONS as people who changed their address in the previous year. In the 2001 Census, 23% of City residents were recorded as migrants. The bulk of the people who moved into the area are from within the UK, 4% are from outside the country. This means that almost a quarter of residents will be new to the area each year and will need to be educated about the waste and recycling collection services.

3.1.3. Visitors and businesses in the City

Given the demographics and makeup of the City, with a relatively low number of households and residents in comparison to the number of commercial businesses, the main source of waste arisings in the City is that produced by commercial businesses.

The London Plan (see Section 3.3.6 for details) provides projected tonnages of Local Authority Collected Municipal Waste (LACMW) and commercial/business waste, as detailed in Table 2. This shows throughout the period of this strategy, LACMW will remain a fraction of the tonnage of commercial/business waste. These projections do not include construction and demolition waste. The amount of waste produced by this industry within the City is difficult to predict and this may be an area of work which could be investigated during the lifetime of the strategy.

### Table 2: Tonnage ('000 tonnes pa) of Local Authority Collected Municipal Waste and commercial waste

<table>
<thead>
<tr>
<th>Waste stream</th>
<th>2011</th>
<th>2016</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial / business waste</td>
<td>466</td>
<td>481</td>
<td>496</td>
</tr>
<tr>
<td>LACMW</td>
<td>38</td>
<td>41</td>
<td>44</td>
</tr>
<tr>
<td>Total</td>
<td>504</td>
<td>522</td>
<td>540</td>
</tr>
</tbody>
</table>

Both LACMW and the commercial/business waste streams are projected to increase between 2013 and 2020. The reason for this projected increases are:

- For commercial/business waste the employment in the City is predicted to increase from 373,000 in 2011 to 423,000 in 2021 and increased employment will result in increased waste generation.
- For LACMW the number of housing units in the City is projected to increase by 667 units between 2011 and 2016 and by 430 units between 2016 and 2021.

An impact of the low number of residents in the City and the high number of day visitors (workers and tourists) is that on-street waste arisings have a significant effect on our recycling rate and other key performance measures we use. The performance of all Local Authorities’ (LA) collection system to divert waste material from disposal is calculated on the total tonnage of household waste that each LA collects. The legal definition of household waste includes waste collected from households within the LA’s boundary and that collected through the LA’s street cleansing services.

In general, in other authorities, the largest source of LACMW is from households, with street cleansing only accounting for a small proportion. In our case, in 2011/12 the materials collected through our street cleansing services accounted for 43% of the total household waste generated in the City. Going forward, changes to the methods used in the street cleansing service are expected to reduce the total street waste arisings, although this waste stream is still projected to account for approximately 30% of our total household waste arisings. There is therefore a greater impetus for us to focus on both the waste generated by our residents and the street cleansing waste generated by visitors and City workers.

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5. It is based on the idea of distinct dimensions of deprivation which can be recognised and measured separately. The IMD is made up of seven domains; these domains are combined according to different weightings to give the total IMD. The indicators for the seven domains for the Index of Deprivation 2010 are Income, Employment, Health and Disability, Education, Skills and Training, Barriers to Housing and Services, Living Environment and Crime and Disorder.


7. City’s Spatial Strategy Vision and Strategic Objectives
Figure 2: The City of London Performance Management Model Framework “The Golden Thread”

- **The City Together Strategy** (sustainable community strategy for the Square Mile)
- **Corporate Plan** (strategic planning document for the City of London Corporation)
- **Local Plan** (spatial planning vision and strategy for future development)
- **Other strategic plans** (e.g. the City of London’s waste strategy)
- **Departmental Business Plans** (strategic service improvement plans)
- **Team Plans** (improvement plans for individual teams with departments)
- **Individual performance appraisals** (individual objectives and targets for staff related to their business plan)
- **Core Values**
3.2. The City of London’s Overarching Strategic Vision

The City of London Corporation formulates all its strategies and plans from high level documents right down to personal objectives in the context of the ‘Golden Thread’ which links the organisational vision and values with the day to day delivery of services, see Figure 2. This thread recognises the value and influence of the past and applies modern good practice management to the issues of today, and is made up of five key themes which run consistently through all corporate literature: Quality, Inclusion, Environment, Promotion and People.

The City Together Strategy 2008-2014, which was prepared by the Local Strategic Partnership for the City of London, on behalf of everyone who works in, lives in or visits the City, is the starting point for the Golden Thread. This document describes a vision of a sustainable plan for the future of the City.

Figure 3 shows the connection between The City Together Strategy and the principal other strategies which influence or impact on the Waste Strategy and sustainable resource use throughout the Square Mile.

Table 3 summarises some of the key objectives of these principal strategies.
### Table 3: Key objectives of other principal strategies

<table>
<thead>
<tr>
<th>Strategy title</th>
<th>Objective</th>
<th>Further detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Core Strategy</td>
<td>The strategic planning document sets out a spatial framework for how the City of London Corporation wants to see the City develop to 2026 and beyond.</td>
<td>Takes account of projected changes in economic circumstances and employment projections, transport needs, housing needs, the impact of climate change, the need to protect and enhance the City’s historic legacy and the overarching need to improve the quality of life for all the City’s communities (workers, residents and visitors).</td>
</tr>
</tbody>
</table>
| The Corporate Plan                                   | The City of London Corporation’s main strategic planning document, providing a framework for the delivery of services.                   | The City of London Corporation’s vision is to support and promote the City of London as the world leader in international finance and business services, and maintain high quality, accessible and responsive services benefiting its communities, neighbours, London and the nation. There are three strategic aims:  
- To support and promote ‘The City’ as the world leader in international finance and business services.  
- To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes.  
- To provide valued services to London and the nation.  
The Corporate Plan process helps to consider competing pressures and the links between them, and establish a shared understanding amongst Members and officers of the priorities going forward. |
| The Climate Change Mitigation Strategy                | Sets out how City of London Corporation plans to catalyse action to reduce greenhouse gas emissions in the Square Mile and beyond.         |                                                                                                           |
| The Air Quality Strategy                             | Outlines the direction for air quality policy in the City of London through to 2015.                                                      | It details how we will fulfil our obligations for air quality management and how we will continue to monitor the effectiveness of policies and measures that are introduced to reduce pollution. It also outlines the main sources of pollution in the Square Mile and how poor air quality can affect health. |
| The City of London’s Climate Change Adaptation Strategy | Aims to identify the priority risks associated with climate change and proposes adaptation measures which are designed to ensure that the City’s infrastructure and services cope under a changing climate. |                                                                                                           |
| Local Implementation Plan                            | The City’s plan for implementation of the Mayor of London’s Transport Strategy                                                              | The plan was approved in January 2012.                                                                    |
| Adopted Core Strategy                                | Provides a spatial framework for development in the City to 2026.                                                                           | The City of London Corporation is currently preparing a Local Plan which will incorporate the strategic direction from the Core Strategy and more detailed Development Management policies to guide development decisions in the City. |
3.3. Legislative Context

3.3.1. Background

This section outlines the current legislation and the changes that have taken place with regards to waste management legislation and policies since the Municipal Waste Strategy was developed by the City of London in April 2008. It then considers the legislation regarding planning for any new recycling and waste management facilities which will be required in order to enable the City to meet its future targets.

Since the previous Waste Strategy was published numerous changes have occurred in both European Union (EU) legislation and UK legislation which affect the way waste is dealt with at a local level. In March 2011, the EU Waste Framework Directive was transposed into national law creating three main impacts upon waste management in the UK:

1. A national ‘Waste Prevention Plan’ must be put into place by 2014.
2. All Local Authorities must provide recycling services, either through kerbside collection or using bring banks, for glass, metals, paper and plastics by 2015.
3. Following the principles of the "waste hierarchy" is now law.

These changes catalysed the government to conduct a National Review of Waste Policy in England in June 2011. The resultant aim is to move towards a ‘zero waste economy’ between 2012 and 2020 through viewing waste as a resource. The Government will publish a follow up zero-waste action plan on waste prevention (Waste Prevention Plan) in December 2013 to check progress and address further developments under any new EU regulation.

More information on the other relevant national legislation and regional strategies that the City’s waste strategy has considered can be found in Appendix 1.

See Figure 5, overleaf: Timeline of EU and National Legislation and Policies Impacting City of London Waste Management

3.3.2. European Waste Policy and Legislation

The European Union has become the major source of environmental legislation and guidance in relation to the management of waste. A number of European Directives which aim to increase levels of recycling and recovery, and thus reduce the amount of waste which is landfilled, have been introduced:

- Landfill Directive (1999/31/EC)
- Ozone Depleting Substances (Regulation 1005/2009)
- Directive on Batteries (2008/103/EC)

There are two key areas of European legislation that this Waste Strategy has to consider: the Landfill Directive and the revised Waste Framework Directive.

The Landfill Directive aims to prevent, or minimise, the negative effects on both the environment and human health caused by landfilling of wastes. It has and will continue to have a significant impact on landfill practices in the UK as it bans certain materials from being landfilled, it requires waste to be pre-treated before it is landfilled and requires improvements to landfill management. The introduction of the Landfill Directive has resulted in a significant reduction in the number of landfill sites in the UK accepting hazardous wastes. The ban on landfilling of certain wastes, such as tyres, from 2006 has meant that new arrangements for their collection and management have been introduced.
Landfilled biodegradable waste is a major source of methane, which is a greenhouse gas over 20 times more potent than carbon dioxide in terms of global warming. The Landfill Directive requires the amount of biodegradable municipal solid waste sent to landfill in the UK to be reduced:

- to 75% of 1995 levels by 2010 (the UK met this target)
- to 50% of 1995 levels by 2013, and
- to 35% of 1995 levels by 2020.

The UK Government implemented the requirements for landfilling of Biodegradable Municipal Waste (BMW) through the Waste and Emissions Trading Act 2003 (WET Act). The most recent landfill allowance targets of BMW, required by the WET Act, are allocated under the Landfill (Maximum Landfill Amount) Regulations 2011 (SI 2011/2299), stating individual targets for England, Scotland, Wales and Northern Ireland, as well as a collective target for the UK as a whole to be achieved in 2013 and 2020.

The Waste Framework Directive 2008 has established fundamental principles for waste management in Europe. The revised Waste Framework Directive seeks to increase the use of waste as a resource and to place greater emphasis on the prevention and recycling of waste. It includes a new waste hierarchy, shown in Figure 4, below, which revises how reuse of materials is defined and how recycling is distinguished from other recovery.

Information on these two key Directives and other relevant EU legislation that the City’s waste strategy has to consider can be found in Appendix 1.

Figure 4: The Waste Hierarchy

3.3.3. UK Waste Policy and Legislation

Although most waste legislation in the UK has been introduced to meet the requirements set by European Directives, the UK Government has also introduced additional legislation, some of which is specifically aimed at encouraging recycling:

- Waste Minimisation Act 1998
- Local Government Act 1999 – Best Value Regime
- The Animal By-Products (Enforcement) (England) Regulations 2011
- Household Waste Recycling Act 2004

The main area of national legislation that this updated Waste Strategy has to consider is the Landfill Tax Regulations. Landfill Tax is a tax payable for each tonne of waste sent to landfill and was introduced by the Government in 1996 as a way of encouraging more sustainable means of waste management through recognising the hidden financial effects of the environmental impact of landfill. The tax, which is currently £72 a tonne has been set to increase at a rate of £8 each year from 1 April 2011 until at least 1 April 2014. There will then be a floor under the standard rate ensuring the rate will not fall below £80 per tonne from 2014/15 to 2019/2020. This increase in landfill tax has caused a significant increase in waste disposal costs and is a further incentive to move to more sustainable means of waste treatment in the near future.
Figure 4: Time line of EU and National Legislation and Policies Impacting City of London Waste Management

- Environmental Protection Act 1990
- Controlled Waste Regulations (1992) (as amended)
- Packaging and Packaging Waste Directive 94/62/EC
- Waste Management Licensing (MWL) Regulations 1994
- Producer Responsibility (Packaging Waste) Regulation 1997
- LANDFILL DIRECTIVE 1999/31/EC
- Greater London Authority Act 1999
- Local Government Act 1999 – Best Value Regime
- Pollution Prevention and Control Act 1999
- Animal By-Products Regulation (EC) No. 1774/2002
- Restriction on the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Directive 2002/95/EC
- Landfill (England and Wales) Regulations 2002 (as amended)
- City of London Unitary Development Plan 2002
- Directive on Packaging and Packaging Waste 2004/12/EC
- Landfill Allowance Trading Scheme (England) 2004 (as amended)
- Household Waste Recycling Act 2004
- The London Plan 2004
- Directive on Waste 75/442/EEC
- Environmental Protection (Duty of Care) Regulations (1991) (as amended)
- Controlled Waste (Regulation of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)
- Batteries Directive 91/157/EEC
- The Financial Act 1996
- Landfill Tax Regulations 1996
- Waste Minimisation Act 1998
- Ozone Depletion Regulation 2037/2000
- WEEE Amendment Directive 2003/108/EC
- Household Waste Recycling Act 2003
- Waste and Emissions Trading Act (WET) 2003
- Packaging (Essential Requirements) Regulations 2003 (as amended)
- End-of-Life Vehicles Regulations 2003
- Animal By-Products Order and Regulations 2003
- Mayors Plan 2003: Rethinking Rubbish in London
- Batteries Directive 2006/66/EC
- Waste Electrical and Electronic Equipment Regulations 2006

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- Environmental Permitting (England and Wales) Regulations 2007 (as amended)
- Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended)
- Waste Electrical and Electronic Equipment Regulations 2007 (as amended)
- Greater London Authority Act 2007

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- Ozone Depleting Substances Regulation 1005/2009
- Animal By-Products Regulation 2009
- Waste Batteries and Accumulators Regulations 2009
- Joint Waste Authorities (Proposals) Regulations 2009
- Ozone Depleting Substances (Qualifications) Regulations (SI 2009/216)

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- End of Waste Criteria Regulation EC 333/2011 (scrap metal)
- WASTE (ENGLAND AND WALES REGULATIONS 2011
- Landfill (Maximum Landfill Amount) Regulations 2011 (SI 2011/2299)
- The Animal By-Products (Enforcement) (England) Regulations 2011
- PPS10: Planning for Sustainable Waste Management 2011
- Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2011 (SI 2011/1543)
- Mayor of London’s Municipal Waste Strategy 2011
- Mayor of London’s Business Waste Strategy
- The London Plan 2011
- Review of Waste Policy in England 2011

2005
- Clean Neighbourhoods and Environment Act 2005
- Site Waste Management Plan Regulations 2005
- Hazardous Waste (England and Wales) Regulations 2005 (as amended)
- List of Wastes (England) Regulations 2005 (as amended)
- Animal By-Products Regulation 2005 (as amended)
- End-of-Life Vehicles (Producer Responsibility) Regulations 2005
- Planning Policy Statement 10 (PPS10) 2005

2006

2007
- WASTE FRAMEWORK DIRECTIVE 2008/98/EC
- Integrated Pollution Prevention & Control Directive 2008/1/EC
- Ozone Depleting Substances Regulation EC 1005/2009
- Directive on Batteries 2008/203/EC
- Restriction on the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2008 (as amended)
- Batteries and Accumulators (Placing on the Market) Regulations 2008
- City of London Municipal Waste Strategy 2008-2020

2008

2009

2010

2011

2012

2013
- Environmental Permitting Regulations (England and Wales) 2010
- WEEE Directive 2012/19/EU
- National Planning Policy Framework (NPPF) 2012
- Waste (England and Wales) (Amendment) Regulations 2012
- Localism Act 2012
- Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) (Amendment) Regulations 2012 (SI 2012/1151)

- Waste Prevention Plan 2013
3.3.4. Waste strategy for England


An updated waste strategy for England was published (following consultation during 2006) in May 2007. The aim of this updated Waste Strategy, which sets the Government’s vision for sustainable waste management, is to reduce waste by making products with fewer natural resources, and thus breaking the link between economic growth and waste growth. Products should be re-used, their materials recycled, energy from waste recovered, and landfilling of residual waste should occur only where necessary. The key points are:

- Waste minimisation - A strong emphasis on waste prevention with households reducing their waste (for example, through home composting and reducing food waste), businesses helping consumers, for example, with less packaging, development of a service which will enable households to opt-out of receiving unaddressed as well as addressed direct mail, and a reduction in the use of free single-use plastic bags.

- Recycling - More effective incentives for individuals and businesses to recycle waste, leading to at least 40% of household waste recycled or composted by 2010, rising to 45% by 2015 and 50% by 2020. This is a significant increase on the targets (30% by 2010 and 33% by 2015) in the previous waste strategy (which was published in 2000).

- Treatment of residual waste - Increasing the amount of energy produced by a variety of energy from waste schemes, using waste that can’t be reused or recycled. It is expected that from 2020 a quarter of municipal waste - waste collected by local authorities, mainly from households - will produce energy, compared to 10% today.

The Government published a ‘Review on Waste Policy in England 2011’ that reviews the waste policies in England. The aim is to move towards a ‘zero waste economy’ between 2012 and 2020 through the idea of using waste as a resource. One of the most significant results is the abolition of the Landfill Allowance Trading Scheme (LATS), ended after the 2012/13 scheme year. The Government will publish a follow up zero-waste action plan on waste prevention (Waste Prevention Plan) in December 2013 to check progress and address further developments under any new EU regulation.


3.3.5. London wide policy

The Greater London Authority (GLA) is responsible for setting London wide policies across a range of policy areas including waste management. The GLA has a statutory duty to produce a municipal waste management strategy. Although it does not have any legal responsibilities in relation to the other waste streams, it uses its influence to encourage sustainable waste management practises in relation to the business waste through its business waste strategy.

In 2003 the Mayor of London published a waste strategy for London ‘Rethinking Rubbish in London’ placing an emphasis on slowing the growth of London’s waste, significantly increase recycling and composting, increasing the number of facilities in London to process recycled material into new products and expanding the capacity for being able to treat and dispose of more of London’s residual waste within London. In 2010, the Mayor of London revised his waste strategy producing a 2011 version. The key driver for the production of a revised waste strategy is climate change and within the document, much emphasis is placed on the environmental impact of London’s waste management activities in relation to greenhouse gas emissions. The Greater London Authority Act 2007 requires Municipal Waste Management Strategies to be ‘in general conformity’ with the Mayor of London’s Strategy for the capital.

The Mayor of London’s 2011 Strategy, “London’s Wasted Resource”, includes the following targets:

- Achieve zero municipal waste direct to landfill by 2025

- Reduce the amount of household waste produced in 2008/09 from 970kg to 790kg per household by 2031

- Increase London’s capacity to reuse or repair municipal waste from approximately 6,000 tonnes per annum in 2008 to 40,000 in 2012 and 120,000 in 2031

- Recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% 2031

- The management of London’s municipal waste to achieve annual greenhouse gas emissions savings of approximately:

  - 1.2 million tonnes of CO2eq in 2015
  - 1.4 million tonnes of CO2eq in 2020
  - 1.6 million tonnes of CO2eq in 2031

- To generate as much energy as possible from London’s organic and non-recyclable 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% of London’s municipal waste after recycling or composting targets are achieved by 2031.
The Strategy also highlights the need to manage more municipal waste locally in order to comply with the 100% net self-sufficiency by 2031 target for the management of London’s municipal and commercial waste set out in The London Plan. The London Plan is the Mayor of London’s spatial development plan for London, containing planning policies that cover all of London’s waste.

The strategy has six key policies:

■ Policy One: Informing producers and consumers of the value of reducing, reusing and recycling municipal waste
■ Policy Two: Reducing the climate change impact of London’s municipal waste management
■ Policy Three: Capturing the economic benefits of municipal waste management
■ Policy Four: Achieving high recycling or composting rates resulting in the greatest environmental and financial benefits
■ Policy Five: Stimulating the development of new municipal waste management infrastructure, particularly low carbon technologies
■ Policy Six: Achieving a high level of street cleanliness

The Mayor of London’s Business Waste Strategy, “Making Business Sense of Waste”, also published in 2011, sets out the following targets:

■ Achieve 70% re-use, recycling and composting of commercial and industrial (C&I) waste by 2020, maintaining these levels to 2031.
■ Achieve 95% re-use, recycling and composting of construction, demolition, and excavation (CDE) waste by 2020, maintaining these levels to 2031.
■ Delivery approach will be sector specific

And the following key policies:

■ Policy One: Promoting the financial and commercial value of a resource-efficient business
■ Policy Two: Boosting re-use, recycling and composting participation in the C&I sector
■ Policy Three: Supporting the waste infrastructure market in London to grow and to deliver for businesses
■ Policy Four: Drive improvements in resource efficiency in the CDE sector while continuing to maintain the good levels of reuse and recycling performance already being achieved

The Mayor of London will also work with, the City boroughs, the Environment Agency, industry and neighbouring authorities to identify the capacity gap for managing hazardous waste and maintain direction on the need for capacity.
3.3.6. Planning Policy Guidance

All authorities have a statutory duty to prepare a development plan, which sets out their policies and proposals for land use, transport and the environment, and this is used to assess planning applications. Thus planning policy and waste management are inextricably linked to the development of future infrastructure for waste management in the UK. Planning decisions on waste treatment facilities made now and in the near future will influence whether or not the UK will be able to meet the landfill diversion targets set by the Landfill Directive.

From the 27th March 2012 the National Planning Policy Framework (NPPF) was introduced. However, waste was excluded from the NPPF due to new guidance being created in due course in the form of National Waste Management Plan for England (NWMP), this is due to be published in December 2013. Therefore former guidance on planning for waste (Planning Policy Statement 10) remains in force. Local Authorities preparing waste plans and taking decisions on waste applications should still have regard to the relevant policies in the NPPF.

The following planning policy documents will have an impact on planning for any future waste management facilities:

- Planning Policy Statement 10: Planning for Sustainable Waste Management
- The Spatial Development Strategy for Greater London (The London Plan)
- The ‘extended’ policies in the City of London Unitary Development Plan
- Local Development Framework.

The City is a Minerals and Waste Planning authority, and also has to ensure that its plans are in general conformity with the London Plan. The City of London Unitary Development Plan (UDP), adopted in 2002, has had most of its policies superseded by the Local Development Framework (LDF), but 55 will remain in force until 2013, including a requirement for adequate provision for the storage, presentation for collection, and removal of waste (UTIL 6 Waste Storage Collection).

The LDF Core Strategy policy on waste management (Policy CS17) safeguards Walbrook Wharf as a waste site for river based waste handling. Policy CS17 also requires the City to establish the potential for both intensification of current waste management activities at Walbrook Wharf and identification of options for potential additional waste management within the City, or elsewhere in London, to meet the London Plan waste apportionment target. The waste apportionment is the proportion of London’s waste which each Local Authority must plan for as required by (and set out in) the London Plan. The City’s waste apportionment is 100,000 tonnes which means that we must identify facilities with the capacity to manage 100,000 tonnes of waste either within the City or, by agreement with another borough, elsewhere in London.

The City of London Corporation is working with the London Borough of Bexley, utilising spare waste management capacity in Bexley, to ensure that the City’s 100,000 tonne waste apportionment can be met. In the future, changing economics and new waste management technologies may mean that small scale waste management becomes viable within the City. Such changes will be identified through regular review of the City’s Waste Capacity Study (as outlined in the City of London Core Strategy, September 2011).

It is noteworthy that London is an exception to the Localism Act 2012, which abolishes Regional Spatial Strategies (RSSs). The London Plan remains in place as a strategic planning document and has not been removed as part of the changes affecting other regional planning documents.
SECTION 4: THE VISION

This updated Waste Strategy responds to the statutory drivers for waste management and is in line with national and regional policies at the same time as supporting the needs of residents and businesses in the City of London. The overarching aim of this Strategy is:

‘To increase reuse and recycling and reduce waste arisings and carbon impacts associated with waste management from householder, businesses and visitors within the City, to include City of London buildings and staff’.

In essence, we believe that the City and its stakeholders should view waste as a resource, and that we provide appropriate and innovative facilities for the management of our waste, that are used effectively by those who produce waste across the City.

In order to deliver on this aim and to respond to the statutory requirements and other drivers for responsible waste management, we have developed a set of waste strategy objectives. These proposed objectives, which support and respond to the variety of drivers (internal/ local, regional and national) are outlined in Table 4. Associated targets for these objectives are presented in Section 5.3.
### Table 4: Description of our nine proposed objectives

<table>
<thead>
<tr>
<th>Objective</th>
<th>Objective Description</th>
<th>Links to key drivers</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The City of London Corporation becoming more resource efficient</td>
<td>Although we are only required to report on municipal figures for waste and recycling, we are in a unique position to influence the behaviours of a number of other stakeholders and we are committed to engaging with them to encourage sustainable waste management and adherence to the waste hierarchy.</td>
<td>The recent and developing concept of the Circular Economy, whereby waste materials are seen as a resource. The Government’s review of national waste policy, whereby the Government is seeking actions and commitments, not only of government but of other key factors, which together set a clear direction towards a zero waste economy.</td>
</tr>
<tr>
<td>2. Waste Reduction</td>
<td>We are committed to following the waste hierarchy and as such our first priority is to implement initiatives that encourage and support our residents to take responsibility to reduce the overall household waste they produce.</td>
<td>In response to the waste hierarchy, national and mayoral strategies, as well as recognising the philosophy of the circular economy. Responding to the target in the Mayor of London’s Municipal Waste Strategy: “To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20% reduction per household. (this equates to a 1% reduction per year)”</td>
</tr>
<tr>
<td>3. Reusing materials</td>
<td>We will provide services and initiatives that encourage the reuse of items, therefore diverting these materials from final disposal.</td>
<td>Support of the waste and resource management industry and economic growth, whereby materials reuse can result in diversion from landfill and development of growth and possible employment opportunities in design, repair and reuse.</td>
</tr>
</tbody>
</table>
| 4. Recycling and Composting | We are committed to providing all of our residents with the opportunity to recycle as many materials as possible and collecting these materials in a timely manner. | Increase household capture, recycling and participation rates, in line with Mayor of London strategies and with the philosophies of increasing the quality and capture levels of the materials collected for recycling and composting, in order to support the reprocessing industries. The Mayor of London’s Municipal Waste Strategy targets are:  
- To recycle or compost at least 45% of municipal waste by 2015, 50% by 2020 and 60% per cent by 2031.  
- Defra is currently consulting on the development of an industry protocol, with the objective of increasing the quality of materials recycled, in order to support onward reprocessing sectors.  
- Outputs from organics processing need to comply with PAS100 or PAS110 respectively and should meet the End of Waste criteria outlined in the Quality Protocols for Compost and/or Digestate. |

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8. In the circular economy model, the waste industry works together with the economic cycle of product manufacture so that when a product reaches the end of its useful life it becomes a part of the waste cycle where it is treated to become a secondary resource.

9. PAS 100 is a British Standards Institute (BSI) specification for composted materials, developed in conjunction with the Association for Organics Recycling (AFOR).

10. PAS 110 is a British Standards Institute (BSI) specification for Anaerobic Digestion (AD) outputs which specifies a minimum quality of whole digestate, separated fibre and separated liquor for Organics Recycling.
<table>
<thead>
<tr>
<th>Objective</th>
<th>Objective Description</th>
<th>Links to key drivers</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. To work with the City’s business community</td>
<td>The City of London Corporation has a long history of direct engagement with City businesses on waste and recycling related issues through the Clean City Awards Scheme and Considerate Contractor’s Scheme. We are committed to continuing this tradition to achieve the objectives of this Strategy.</td>
<td>Responding to the ambitions within the Mayor of London’s Business Waste Strategy and WRAP’s Local Authority Business Waste Collection Commitment. To help influence and support our business community to recognise the value in their waste, the cost of waste management and the opportunities presented to them of managing waste sustainably.</td>
</tr>
<tr>
<td>6. Zero Waste to Landfill</td>
<td>We are committed to diverting all of the City’s Local Authority Collected Municipal Waste (LACMW) away from landfill.</td>
<td>Supporting the London Mayoral strategies, the government’s review of policy and responding to the waste hierarchy.</td>
</tr>
<tr>
<td>7. Responding to Climate Change and Poor Air Quality.</td>
<td>We will aim to reduce our negative impact on climate change and improve air quality in the City.</td>
<td>In support of the City’s Climate Change Adaptation And Mitigation Strategies and responding to the London Mayoral strategies.</td>
</tr>
<tr>
<td>8. Effectively engaging and communicating</td>
<td>We understand that we cannot realise our ambitions within this strategy without engaging with our residents, those visiting the City and other stakeholders, in new and dynamic ways.</td>
<td>Education and awareness raising; ensuring that our engagement activities are focused on achieving behaviour change and supporting our stakeholders to do the right thing.</td>
</tr>
<tr>
<td>9. Value for Money</td>
<td>We are committed to ensuring that the services we provide are in line with “Value for Money” principles whilst balancing environmental impacts.</td>
<td>Responding to the Chartered Institute of Public Finance and Accountancy (CIPFA) ‘Value for Money’ principles, as outlined in Section 5.1.10.</td>
</tr>
</tbody>
</table>
5.1. Understanding where we are

Before deciding how to achieve our vision for 2020 we first need to understand where we are now in regards to service provision and performance and how different elements of the service contribute to the application of the waste hierarchy.

5.1.1. Current waste prevention and reuse initiatives

Currently, we provide a real nappies incentive of £50 cash back per family when they purchase real nappies. On average, 50 babies are born each year in the City, and approximately five families (10%) per year, take advantage of this incentive.

The bulky waste stream is another waste stream that we have already started to focus on and we have aspirations to increase the number of bulky waste items reused in the City. Options available to provide such a service and associated costs are being investigated. The options include working with local charities, neighbouring boroughs and/or the London Reuse Network. These are currently being reviewed and are included in Section 5.3.

We continue to support the national Love Food Hate Waste campaign and work closely with Recycle for London to deliver workshops, cookery demonstrations and distribute information wherever appropriate, to both businesses and residents.

We promote the Mail Preference Service as a means for residents to avoid unwanted junk mail as well as providing advice on our website about other ways in which residents and businesses can reduce the amount of waste that they produce.

The recycling team run regular “Give and Take Days” as part of the Recycling Roadshows. “Give and Take” events are an opportunity for residents to donate items they no longer need, and take items they do need, all for free. Residents can donate unwanted items such as books, clothes, bric-a-brac, furniture and small electrical items. Donated items are sorted into categories, ready for residents to come and collect, ensuring good quality items can be reused by residents on the same or neighbouring estates.

Our enforcement team and Clean City Awards officers are also working in partnership with the City and Hackney Public Health Directorate to reduce smoking related litter via our “No Ifs, No Butts” campaign, which has been running since October 2009, as well as offering City employees the opportunity to attend smoking cessation classes and the implementing incentive initiatives to quit smoking.
5.1.2. Current recycling and composting services

5.1.2.1. For residents/at home in the City

We provide our residents with a commingled recycling service, and where practical, a food waste collection service, textile recycling and Waste Electrical and Electronic Equipment (WEEE) recycling services. Through the commingled recycling service residents can recycle paper, cardboard, glass, mixed plastic, tetra pak, foil, plastic bags and cans. The collection services provided to residents depend on where residents live and the local circumstances/design layout of the property. More details on the services provided to the different housing types are outlined in Appendix 2 and can be found on the City of London website www.cityoflondon.gov.uk/recycling.

The participation rates for the dry recycling and food waste collection services across the four estates are provided in Table 5. Participation rates for residents living in private blocks are extremely difficult to calculate due to the nature of the properties and the way in which waste and recycling is presented, either in communal bins or on the street. Participation rates for these properties are therefore not included.

Table 5: Participation rates for the dry recycling and food waste collection services

<table>
<thead>
<tr>
<th>Estate</th>
<th>N° of Residents</th>
<th>Dry recycling</th>
<th>Food waste collection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barbican Estate</td>
<td>2044</td>
<td>82.3%</td>
<td>38.5%</td>
</tr>
<tr>
<td>Golden Lane Estate</td>
<td>564</td>
<td>67.4%</td>
<td>29.3%</td>
</tr>
<tr>
<td>Middlesex Street Estate</td>
<td>196</td>
<td>71.4%</td>
<td>17.3%</td>
</tr>
<tr>
<td>Mansell Street Estate</td>
<td>194</td>
<td>55.2%</td>
<td>11.9%</td>
</tr>
</tbody>
</table>

5.1.2.2. For visitors / out and about in the City

It is our responsibility to keep the streets within the City clean and free of litter. We pride ourselves in the high standard of street cleansing we deliver within the Square Mile and have set an enhanced grade A sweeping target. Since 2008, recycling has been integrated within this service to ensure that we recover as much of the recyclables items from street litter for recycling.

To demonstrate our commitment to recycling our street litter, we recently installed 100 on street recycling bins for mixed recyclables and paper. The units are located in areas of high footfall to maximise the amount of recyclate collected.

5.1.2.3. Other recycling services

We have an arrangement with the London Borough of Tower Hamlets that allows our residents to use their Household Waste Reuse and Recycling Centre (HWRC).

In addition to this, we also run a series of “Recycling Roadshows” which allow residents to dispose of any unwanted items they might have. We accept any items (apart from hazardous, commercial or builders waste) at the events and identify the best route for these items: either reuse, recycling or disposal. A collection service is offered on these days to residents who are unable to carry items down to the venue location. As part of the Recycling Roadshow, the recycling team also run a “Give and Take Day” helping residents to reuse good quality items. Please see Section 5.1.1 for further information.

5.1.2.4. What happens to the materials we collect

All the recyclable materials collected by our waste contractor (this includes both our household waste and any commercial waste our contractor collects) is currently taken to a Materials Recovery Facility (MRF) where it is sorted into individual recyclable material streams for onward processing.

We are aware of the increasing importance of capturing high quality materials for recycling. The MRF operator we work with regularly samples the loads of recyclables we transport to its facility and we are pleased to report that currently the quality of our material has always met the operator’s requirements. This high standard of material is an element of the recycling service that we need to continue to meet throughout the lifetime of this updated Waste Strategy.

The food waste we collect is sent for composting.

We have partnership arrangements with third party organisations to collect the textiles, WEEE, batteries and bulbs from the recycling banks located on our four main housing estates.

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11. The street cleansing grades are defined in DEFRA’s Code of Practise for litter and refuse. The enhance grade A is a standard of street cleansing that is higher than that outlined in this Code of Practise and is defined in our Waste Collection and Street Cleansing contract.

12. The monitoring protocol used to calculate these figures has been taken from the WRAP guidance document “Improving the Performance of Waste Diversion Schemes: A Good Practice Guide to Monitoring and Evaluation”. In order to assess participation rates it is necessary to define the time period over which the monitoring should take place, this was eight consecutive days for the Barbican Estate and six consecutive collection days over a three week period for the remaining three estates.
5.1.3. Current residual waste collection

5.1.3.1. For residents

Residents living in the City receive a residual waste collection service tailored to the individual circumstances at the property. These services are provided in Table 6. More details on the services provided to the different housing types are outlined in Appendix 2.

Table 6: Refuse collection services

<table>
<thead>
<tr>
<th>Property type</th>
<th>Description of refuse service</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Barbican Estate</td>
<td>Historically residents used a Garchey system(^\text{13}) to dispose of the majority of their residual waste down the drainage system. Over the years many residents have removed this system from within their property, however as some residents still use it we are required to regularly empty the storage tanks. Residents also receive a five days a week doorstep collection of residual waste.</td>
</tr>
<tr>
<td>Golden Lane Estate, Middlesex Street Estate and Mansell Street Estate</td>
<td>Via refuse chutes or communal residual waste containers.</td>
</tr>
<tr>
<td>Private blocks without bin stores</td>
<td>Residents are provided with white residual waste sacks, which residents are instructed to leave on the street for collection (within the timebands, see section 5.1.8).</td>
</tr>
<tr>
<td>Private blocks with bin stores:</td>
<td>Communal containers located in the bin stores.</td>
</tr>
</tbody>
</table>

5.1.3.2. Bulky waste

Residents within the City can dispose of their bulky items; either by phoning up for a collection or residents living on some of the housing estates have bulky waste storage areas on their estates where they can take their bulky waste.

We also partner with the London Re-Use Network to ensure that furniture and electric appliances in good condition are collected for reuse and taken to a partner depot where they are refurbished and sold at reduced prices to families on low incomes.

5.1.3.3. Clinical waste

We provide a free clinical waste collection service to residents that require one. Over the last five years we have seen a steady drop in the number of requests/tonnage of clinical waste we collect.

5.1.3.4. For visitors / out and about in the City

As mentioned in section 5.1.2.2 we pride ourselves on the level of street cleansing that is provided in the City and the standard of street cleansing that is maintained throughout the City. In addition to the services outlined in section 5.1.2.2 we also provide standard litter bins and specialised litter bins for cigarette litter and chewing gum. More details on these services are provided in Appendix 3.

5.1.3.5. Hazardous waste

We administer the London Wide Household Hazardous Waste Collection Service on behalf of all except one of the London Boroughs. In the majority of cases, residents contact us directly to organise the collection of their hazardous waste. Where practical our contractor recycles these hazardous materials.

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\(^{13}\) The Garchey system installed in the Barbican was invented by Frenchman Louis Garchey, after whom it was named, in 1927 for a large block of flats in Paris. Various forms of refuse are put into a bin beneath the kitchen sink, drenched with water to compact them together and then flushed down refuse chutes to a refuse station where a vacuum-pumps waste into a retention vessel which is then transported for disposal.
5.1.3.6. What happens to the residual waste we collect

All the residual waste collected by our waste collection contractor is taken to our Walbrook Wharf transfer station, in the City, for bulking and then transported via barges on the River Thames to the Riverside Energy from Waste (EfW) facility at Belvedere becoming fully operational (October 2011) and is now accepting all the residual waste we collect. The EfW is located at Belvedere in the London Borough of Bexley.

The transportation of our waste using the river has the benefit of removing 26 heavy good vehicle (HGV) return journeys from the road for each barge we send to the EfW. On average we send three barges a week to this facility equating to 156 per year which removes 3744 HGV journeys.

Following on from the incineration process, left over ash (commonly referred to as bottom ash) from the EfW plant is sent for further processing to recover metals for recycling and aggregates.

5.1.4. Current Service performance

5.1.4.1. Key performance indicators

We use three performance indicators against which to report the performance of our collection service;

I. Recycling rate, which is the quantity of materials sent for recycling or composting as a percentage of the total household waste collected (formerly NI 191)

II. The weight per household of residual waste produced per year, commonly referred to as kg/hh/yr (formerly NI 192)

III. The percentage of municipal waste sent to landfill of the total waste collected (formerly NI 193).

Our performance against these three indicators over the last five years is provided in Table 7.

We have provided commentary on our performance over the last six years and how we anticipate this will influence our projected performance over the lifetime of this updated Waste Strategy in Section 5.2.

Table 7: Our performance against the three key performance indicators

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Recycling rate (NI 192)</td>
<td>34.27%</td>
<td>34.11%</td>
<td>34.37%</td>
<td>38.65%</td>
<td>37.10%</td>
</tr>
<tr>
<td>Kg/HH/yr of residual waste (NI 191)</td>
<td>Not measured for this year</td>
<td>568.53</td>
<td>542.08</td>
<td>464.00</td>
<td>465.08</td>
</tr>
<tr>
<td>Percentage of waste to landfill % (NI 193)</td>
<td>89.5%</td>
<td>83.4%</td>
<td>77.4%</td>
<td>75.0%</td>
<td>21.4%</td>
</tr>
</tbody>
</table>
When reviewing Figure 6 it is important to understand that each material stream is likely to include both recyclable and non-recyclable materials. For example, the glass material stream will include glass that is recyclable e.g. drinks bottles and glass that is not recyclable e.g. window pane. Figure 7 categorises the materials streams found within the residual waste stream into those that we accept through the recycling and organic composting services we provide and those that we don’t accept for recycling directly. The results show that 67% of the materials found in the residual waste stream are recyclable or compostable using the City’s services. The remaining 33% includes items like textiles and waste electronic items (WEEE) that the majority of our residents can recycle via containers located on their estates, or via local charity and reuse shops.

Our challenge is to find ways to direct all these items away from the residual waste stream and into the appropriate recycling and composting collection services and to encourage and assist our residents to recycle more.

5.1.4.2. Residual waste composition

To inform this updated waste Strategy and to help identify our objectives and actions to be delivered, we commissioned a residual waste composition analysis of the residual waste collection from City residents in June 2012. The results of this analysis are shown in Figure 6.

The highest percentages of materials within the residual waste stream are kitchen organics, and, paper and card streams. We provide collection services for both of these materials for recycling and composting from the majority of residents in the City. On some of the housing estates the level of service provided is amongst the best in the country. More information on the services we provide is included in Section 5.1.2 and Appendix 2 and 3.

Figure 6: Average household residual waste composition
5.1.4.3. Feedback from residents

The feedback we receive from residents and businesses about the services we provide is generally positive. Over an eight month period (October 2011 to May 2012) we received 133 enquiries and complaints across all our services, covering a range of issues including overflowing bins, waste dumped outside properties and littering in the street. We use this feedback to help continuously improve our services.

In 2009, we polled City residents, businesses and workers to find out their opinions of living and working in the City. As part of this, we asked residents their opinions on the recycling and refuse collection services provided within the City. The results from the resident interview showed that 84% were either very satisfied or satisfied with the recycling collections. Only 8% of residents were either dissatisfied or very dissatisfied, the remaining 8% didn’t offer an opinion. This tells us that the majority of residents were happy with the services we provide. The main change we have made to our collection services since 2009 is the introduction of a food waste collection service to residents in private blocks of flats.
5.1.5. Business waste and recycling within the City

As outlined in Objective One of this updated Waste Strategy, the City is only directly responsible for a small portion of the waste generated within its boundaries; we are not directly responsible for the waste and recycling generated by the city’s businesses, however, in Objectives One and Five, we want to work with these stakeholders to influence them to recycle as much as possible and make positive environmental decisions. Any tangible reduction in the environmental impacts of the waste generated in the City over the period of this strategy can only occur as a result of the combined efforts of key stakeholders.

5.1.5.1. Business waste and recycling collection

As outlined in section 2.2.1, the City of London Corporation transferred the commercial/business waste and recycling services we previously provided directly to our waste collection contractor. They provide a refuse and commingled recycling service to a range of commercial premises in the City via a range of container sizes and single use sacks. These waste streams are currently managed in the same ways as the household waste.

Our contractor is one of many private waste collection contractors that operate in the Square Mile. The services provided by these contractors vary significantly.

5.1.5.2. Engaging with City Businesses

It has been estimated that the amount of commercial/business waste produced in the City was approximately 200,000\(^{14}\) tonnes in 2009. Engagement with City businesses on waste related issues is therefore key to reducing the overall impact of the waste generated in the City.

Since the City consists of predominantly businesses, we operate a range of initiatives and award schemes that engage with City businesses to encourage and reward excellence in specific areas. The initiative that is most relevant to this Strategy is the Clean City Awards Scheme (CCAS). Others that will contribute to the success of this Strategy include the Sustainable City Awards (SCA) and Considerate Contractor Scheme (CCS).

Since 1994 we have run the Clean City Award Scheme CCAS. During this time we have engaged with approximately 1600 City businesses to encourage the responsible management of waste i.e. adherence to waste legislation as well as the encouragement of more sustainable waste management practices such as waste prevention, reuse, recycling and composting. The scheme has an annual awards ceremony where the companies demonstrating the biggest improvements and most innovative methods in reducing their waste are rewarded. Along with regular best practice meetings, the CCAS has supported its members in their efforts to reduce waste and increase the amount of material recycled within the City.

The SCA has a wider focus than the CCAS as it covers the three aspects of sustainability; Economy, Society and Environment. There are 12 categories within the awards the companies can apply to. Unlike the CCAS, the SCA accept entries from outside the City.

The CCS, which has run since 1987, aims to encourage building and civil engineering contractors working in the City to carry out their operations in a safe and considerate manner, with due regard to passing pedestrians and road users. Building sites and streetworks are judged annually on the basis of their overall performance during that year and on a site visit by a specially appointed judging panel. There is an annual award ceremony to recognise high achievers. The Scheme is open to all contractors undertaking building and civil engineering in the City. There is no membership fee, but on joining the scheme, members agree to abide by the code of good practice and to display the CCS signs and stickers on the site adjacent to the public highway.

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5.1.5.3. Open Spaces Department

There are over 200 City gardens, churchyards, plazas and riverside walks throughout the City that are accessible to the public. Our Open Spaces department is responsible for maintaining and clearing these areas of litter. Any waste produced as a result of maintenance works they undertake (e.g. garden waste) is classed as commercial waste.

All of this garden waste is composted.

The litter they collect in these areas is classed as household waste and therefore counts towards our waste reduction and recycling objectives.

At the moment Parks and Gardens has 26 litter bins located in parks and gardens throughout the City and approximately six recycling bins collecting commingled recycling. Their staff also use a two bag litter collection system that separates recyclables from non-recyclables when picking litter from the ground.

We are working together with the Open Spaces department to encourage and support them with separating out recyclable materials from the litter they collect.

5.1.5.4. City Surveyors Department

The City Surveyors is a department within the City of London Corporation that facility manages a number of properties within the Square Mile. There are two distinct types of properties within its portfolio; corporate properties e.g. Guildhall, Mansion House and the London Metropolitan Archives and the management of a number of office blocks many of which are multi-occupancy buildings.

The City Surveyors are responsible for the day to day management of these properties, which includes management of the waste produced. It has introduced recycling for the standard office waste as well as batteries and toner cartridges. They also try to reuse office furniture where possible and engage with their suppliers to reduce the amount of packaging they use when supplying the office blocks. These activities are part of a wider sustainability strategy within their department.

5.1.5.5. Wholesale Food Markets

The City of London Corporation owns and manages London’s three principal Wholesale Food Markets; Billingsgate fish market, New Spitalfields fruit and vegetable market and Smithfield meat market. We provide and maintain the sites and their infrastructure and let out trading space on long term leases to tenants who trade in the various commodities. Of these three markets only Smithfield meat market is located within the City of London boundary.

Due to the nature of Smithfield Market the waste generated (e.g. meat packaging) is often contaminated with Animal By-Products (ABP) and therefore the handling and disposal of the waste is strictly controlled by the ABP regulations. These regulations require the types of ABP produced by the market to be incinerated. For this reason the majority of the waste produced is incinerated.

At present we are segregating clean cardboard (i.e. that has not come into contact with any ABP) and sending this for recycling. We are also investigating ways to recycle the large number of pallets that are used within the markets. In the future we plan to undertake more engagement with the market tenants to encourage sustainable waste management practices.

We are also faced with the issue of other wastes not produced by the Market being fly-tipped in and around the market. This is an on-going problem for the City and one that we are trying to tackle.

5.1.5.6. Charities and Churches

Charity Shops and Churches (except where commercial activities are undertaken) as defined in schedule 1 of the Controlled Waste (England and Wales) Regulations 2012, are collected as household waste and therefore contribute towards our household waste and recycling figures.
5.1.6. Engagement and Enforcement

5.1.6.1. How we communicate and engage stakeholders

We deliver an annual service leaflet or letter to all our residents explaining the services that are provided to them at their specific location and how to use the services. In addition, we provide a quarterly residential newsletter including articles and information related to the services and initiatives that the City of London is responsible for, including a dedicated recycling page. Where available, we also use housing estate notice boards to put up posters promoting particular campaigns, for example advertising "Give and Take Days" and Christmas tree recycling.

As mentioned previously, we also run regular Recycling Roadshows at our four main housing estates. Each estate is visited on a rotating schedule. These roadshows provide us with the opportunity to engage with residents, encourage them to use the recycling services more often and to answer any questions.

5.1.7. Enforcement

We operate an active enforcement team that handles all waste related issues in the City e.g. fly-tipping, littering and Duty of Care for waste. The aim of the Enforcement Team is to keep the pavements and highways of the City clear of waste, to ensure that businesses and residents manage their waste responsibly and in line with legal requirements.

Our policy is to educate first before enforcement and to ensure that producers take responsibility for the waste they produce and adhere to the waste hierarchy. When we identify a problem we will work with people to find solutions to the issues they are facing. Enforcement action will only be taken as a last resort. Actions that can be taken range from issuing Fixed Penalty Notices (FPN) to prosecution in court for serious or persistent offenders.

5.1.8. Time banded collections for bagged waste

In April 2012, we introduced restrictions to when businesses and residents can set out loose or bagged waste and/or recycling on the highway or pavement for collection. We introduced time banded collections to counter the rise in the number of waste and recycling sacks being left on the highway. Sacks left out over long periods of time look unpleasant, can be hazardous and/or cause obstructions, attract further loose waste and can result in vermin issues. This is not the image or experience we want people to have of the City.

The time banding scheme stipulates that no bagged or loose waste is to be placed on the highway between the hours of 8.00am and 6.00pm. From 6pm until midnight, any waste placed out for collection will have to be collected within a two hour period from placement time on the highway. There are no restrictions between midnight and 8am although all bags set out during this time must be cleared from the highway by 8am. All waste collection contractors operating within the City are required to adhere to these time bands, and we expect our City businesses to support this policy and ensure their waste collection contractors are aware of it.

We collect household waste and recycling bags in compliance with the time bands; residents that fail to adhere to these time bands are at risk of being taken through our enforcement procedures. We use enforcement as a last resort, and like all other waste policies, we will work with residents to support and resolve issues first. With regards to business/commercial waste, it is the businesses’ responsibility to ensure that their waste is collected within the time bands. Failure to do this could result in the business being fined. Once again this is a last resort measure and we will work with businesses to find solutions to their issues.
5.1.8.1. Air Quality

The City of London has some of the highest levels of pollution in the UK, due to its location at the heart of London and the density of development. Air pollution is the biggest public health risk after smoking. The economic costs of the health impacts have been estimated to be around £15 billion per annum across the UK. The City of London Air Quality Strategy 2011 outlines a range of policies and actions that we are taking to improve air quality in the Square Mile.

The main source of poor air quality in the City is road transport as a result we have been minimising emissions of pollutants from our own fleet, and that of our contractors, year on year since 2008. This has been achieved through improved fleet management and cleaner vehicles.

We work closely with our street cleansing and waste collection contractor to ensure the cleanest vehicles are used and encourage the contractor to trial new technology as it becomes available.

We have also been working with City businesses, through the CityAir programme, to generate support for reducing emissions associated with their activities, which includes the management of waste.

5.1.8.2. Planning applications

One of our responsibilities is to assess planning and building regulations applications to ensure that adequate waste storage and collection facilities are provided. Such facilities must allow for the separate storage and collection of recyclable waste. We review applications for new buildings and refurbishments.

Premises without adequate waste storage facilities are likely to have a detrimental impact on the street scene and cleanliness of the City. Residents and businesses within such properties are more likely to place their waste on the pavement, attracting more loose waste and potentially vermin.

The work we’ve done in this area over the last 30 years has resulted in the majority of buildings in the City now having adequate storage facilities. This has had a positive impact on the street scene, as well as helping to allow the segregation of waste for recycling.

Most developers working in the City approach us early in the consultation stages of a planning application for advice on how to ensure our requirements will be satisfied.

5.1.9. Carbon

Like many Local Authorities, we are looking at the carbon impact of the waste that we manage. This includes the carbon savings associated with waste prevention, reuse, recycling and composting as well as the carbon impacts related to transportation for the collection and disposal, the treatment of the different waste streams and any energy consumption at our depots.

When we procured the existing street cleansing and waste collection contract we included within the contract, year on year carbon reduction targets and a requirement of the contractor produce an initial three year action plan that demonstrated how these reductions would be met.

During the first year of the contract (October 2011 to September 2012) our contractor gathered, analysed and calculated a baseline carbon impact figure for the collection fleet and electricity consumption of our depot. The carbon impact is measured in Total Direct Green House Gas (GHG) and is presented in tonnes. The figures relevant to the domestic collections and the street sweepings for the first year of the contract are provided in Table 8.

As mentioned in Section 5.1.3.6 we transport our residual waste using the river, which reduces the number of HGV movements and therefore the carbon impact of our collection services.

Table 8: The carbon impacts of the contract

<table>
<thead>
<tr>
<th>GHG associated with fuel usage on the fleet diesel</th>
<th>GHG associated with the electric consumption of the depot</th>
<th>Total GHG</th>
</tr>
</thead>
<tbody>
<tr>
<td>302.70</td>
<td>33.17</td>
<td>335.86</td>
</tr>
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</table>
5.1.10. Value for Money

We use the Chartered Institute of Public Finance and Accountancy (CIPFA) definition and principles of Value for Money (VfM). We apply this principle across all business areas including the waste related services which we procure, this includes waste collection, waste treatment and operational infrastructure purchases (such as containers) to ensure that resources are spent in the right areas and that services are run efficiently and effectively.

VfM is a term used to assess whether or not an organisation has obtained the maximum benefit from goods and services it both acquires and provides, within the resources available to it. It also takes account of the mix of quality, cost, resource use, fit for purpose and timeliness.

VfM can therefore be, and traditionally has been, described in terms of the ‘three Es’:

- **Economy** - minimising the cost of resources for an activity – ‘doing things at a low price’;
- **Efficiency** - performing tasks well – ‘doing things the right way’;
- **Effectiveness** - the extent to which objectives are met – ‘doing the right things’.

5.2. Where we are heading; waste projections

In order to help understand what performance we might be able to achieve, it is important to understand why our performance today is at the level it is, and what has historically influenced our performance. We have assessed our tonnages over the past five years, combined this with information on the changes we have made to our services and operations, and projected the growth of household numbers over the period of this updated Strategy to estimate what our performance would be if we continued without any services changes or additional communications campaigns. This information helps enable us to set realistic improving performance targets.

Figure 8 shows these projected tonnages for the main waste streams we collect. The tonnage data shown on the graph for 2007/08 to 2011/12 is the actual tonnage collected for those years. From 2012/13 onwards the tonnage data shown is projected based on the historic performance, planned changes and projected household numbers.
The significant drop shown in Figure 8 between actual tonnages collected in 2011/12 to forecast tonnage to be collected in 2012/13 is due to the fact that the tonnage collected through our street cleanings and mechanical sweepers, has dramatically decreased in 2012/13. This is as a result of a change of operational delivery methods.

Figure 8 also demonstrates that from 2012/2013 onwards, our projections for the total recycling and residual waste streams forecast an annual reduction of 3%, which results in an annual reduction in total waste arisings of 3%. Since the projections of all the waste streams are decreasing at the same rate, our recycling rate over the lifetime of this updated Strategy (if we chose to remain as we are) is predicted to remain constant at 32.7%. Figure 9 shows the actual recycling rates from 2007/08 to 2011/12 and the projected recycling rate from 2012/13 onwards to 2020/21.

Between 2007/08 and 2011/12 the total waste arisings reduced by an average annual reduction of 2%.

Nationally, the total household waste arisings has also been decreasing. For example, between the financial year 2010/11 and the rolling year January to December 2011 the generation of household waste across the nation has reduced by 0.9%.[15]

The reasons that our total waste arisings have decreased is that we have made considerable efforts to limit the tonnage of commercial/business waste being mistakenly collected as household waste. Historically, there have been a number of avenues where commercial/business waste entered the household waste stream undetected, such as through our household waste skip service and through black bags set out on the streets. Over the last two years, since 2010, we have removed the skip service, and in 2005, we banned the use of black bags for commercial waste.

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Figure 8: Actual tonnage 2007/08 to 2011/12 and projected tonnage 2012/12 to 2020/21

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The recycling rate is predicated to drop between 2011/12 and 2012/13 due to the change in mechanical sweeping delivery methods as mentioned previously. Historically, the facility that this waste was taken to could extract a high volume of recyclable materials from our street sweepings. Earlier in 2012 this facility closed and we have since been diverting the materials to another facility, which is unable to extract as high a volume of recyclable materials. This is due in part to the facility’s capabilities and in part to the impact of the changes to the beat sweeping schedules, which have resulted in a higher proportion of the mechanical sweepings material being litter.

Figure 9: Actual and projected recycling rates based on no interventions
Figure 10: Actual and projected kg/hh/yr of residual waste

Figure 10 shows the actual and projected kg/hh/yr of residual waste (refuse) collected over the lifetime of this updated Strategy. There has been a steady decrease in the amounts of refuse collected over the past five years. There are a number of reasons for this reduction including the increasing amount of materials being separated into the recycling and food waste collections and the implementation of working practices and policies that have reduced the amount of commercial/business waste collected incorrectly as household waste.
Figure 11: Actual and projected percentage of residential waste sent to landfill

Figure 11 shows the actual and projected percentage of residual waste sent to landfill. Between 2007/08 and 2010/11 our reliance on landfill reduced, then during 2011/12 the main destination for our residual waste changed from landfill to Energy from Waste (EfW) plant (see Section 5.1.3.6. for more details).
5.3. The Road Map

We intend to produce yearly action plans to take us from where we are now to where we want to be in 2020 as defined in our objectives (Section 4). The activities within these action plans will be informed by good practice, previous years’ experience and changes in waste policies. It is expected that there will be common themes and areas of focus throughout the eight years of this Strategy. These areas of focus and themes are outlined in Table 9 in the column high level action.

To help track our progress against the objectives we have set ourselves targets for each objective, these targets are also shown in Table 9. The targets are based on existing performance in order to enable progress. Our plan for monitoring against these objectives is outlined in Section 6.
## Table 9: Our objectives, targets and the high level actions we intend to take

<table>
<thead>
<tr>
<th>Objective 1</th>
<th>Target</th>
<th>High level actions</th>
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</table>
| The City of London Corporation becoming more resource efficient            | 1. Markets – work with the Markets team to determine a baseline level of recycling for 2012/13 and assist them in setting achievable improvement targets for 2015/16 and 2019/20 based on the baseline performance by end of April 2013. We will then continue to work with the Markets team to support them in achieving these targets.  
                        | 2. Open Spaces, Parks and Gardens – work with the Open Spaces, Parks and Gardens team to determine a baseline level of recycling for 2012/13 and assist them in setting achievable improvement targets for 2015/16 and 2019/20 based on the baseline performance by end of April 2013. We will then continue to work with the Open Spaces team to support them in achieving these targets.  
                        | 3. City Surveyors – Through the CCAS, we work with the City Surveyors team to determine a baseline level of recycling for 2012/13 and assist them in setting achievable improvement targets for 2015/16 and 2019/20. Then, we will through involvement with the CCAS, support them in achieving these targets.  
                        | 4. Waste collection contractor – through the contract mechanisms and partnership working work with our waste collection contractor to determine a baseline contamination rate within its commercial recycling waste stream for 2012/13 and methods for decreasing this contamination rate.  
                        | 5. Highways department – work with the Highways department to see how the Considerate Construction Scheme can be developed to include the reporting of sustainable waste management practise on construction sites in the City. | a. Attend regular meetings with key contacts  
                        | | b. Assisted in developing a baseline measure of stakeholders activities.  
                        | | c. Provide support to identify opportunities for waste prevention, reuse and recycling initiatives and then support in the development, implementation and improvement of these initiatives.  
                        | | d. To share good practice amongst key stakeholders.  
                        | | e. Promote success stories to wider audiences.  
                        | | f. Where appropriate work with key contacts to reduce the impact of their activities on street cleansing by encouraging the installation of our SmartBins for cigarette litter and chewing gum and recycling litter bins.  |

<table>
<thead>
<tr>
<th>Objective 2</th>
<th>Target</th>
<th>Actions</th>
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</table>
| Waste Reduction                                                           | 1. In line with the Mayor of London’s Municipal Waste Strategy targets, achieve an average year on year 1% reduction in overall waste arisings based on 2010/11 baseline of 753.99 kg/NV/yr until 2020. This would equate to a kg/NV/yr of:  
                        |■ 717.04 in 2015/16  
                        |■ 688.78 in 2020/21  
                        | 2. To achieve an average year on year 1% reduction in residual waste based on 2010/11 baseline of 463.89 kg/hh/yr until 2020. This would equate to a kg/hh/yr of:  
                        |■ 441.16 in 2015/16  
                        |■ 423.78 in 2019/20  | a. Implement communication and awareness raising campaigns and initiatives covering a range of topics including:  
                        | |■ Love Food Hate Waste (LFHW)  
                        | |■ Real Nappies  
                        | |■ No Junk Mail campaigns  
                        | |■ Smarter Shopping  
                        | b. Where relevant, we will link in to international, national and regional campaigns, for example, the European Week of Waste Reduction.  |
### Objective 3

**Target**

1. We will establish a baseline during 2013/14 and then set achievable yearly targets for the amount of materials reused against this initial baseline.

**Actions**

- a. Explore Bulky Reuse Service
- b. Recycling Roadshows incorporating “Give and Take Days”
- c. Continue to promote the use of the textiles and WEEE banks on our four main housing estates and investigate the opportunities to bring these services to all our residents

### Objective 4

**Target**

1. To achieve a recycling rate for household waste of 45% in 2015 and 50% in 2020/21 through targeted campaigns designed to increase capture and participation rates for all recycling and composting services (to include textiles, bulky waste and additional materials).

2. To increase the recycling rate of waste collected through street sweeping and litter bins from a baseline of 23% in 2010/11 to:
   - 27% in 2015/16
   - 31% in 2020/21

3. To achieve an average recycling rate of at least 80% for the mechanical sweepings throughout the period of the strategy (ie 2013/14 to 2020/21).

4. To provide all households with access to equivalent levels of safe and suitable services as appropriate to the building type for a full complement of materials i.e. commingled dry recycling, additional dry materials (textiles, WEEE, batteries, etc), organics and bulky waste, by 2014.

5. Ensuring all new buildings have adequate waste storage and collection facilities. Such facilities will allow for the separate storage of recyclable waste including compostable material.

**Actions**

- a. Carry out an audit of all existing properties to identify any properties that are eligible for additional facilities as they come on line (food waste, batteries etc).
- b. Look at the potential for increasing the range of materials collected through the doorstep collections.
- c. Review of the methods that recycling and food waste sacks are distributed to residents to identify ways to increase the accessibility of sacks.
- d. Regularly explore options that generate energy through the recycling of food waste such as Anaerobic Digestion (AD) plants whilst considering that any options must remain both economically and environmentally practicable.
- e. Keep abreast of developments and improvements to recycling and reprocessing technologies within the industry.
<table>
<thead>
<tr>
<th>Objective 5</th>
<th>Target</th>
<th>Actions</th>
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</table>
| **To work with the City’s business community** | 1. Encourage and support businesses in adopting sustainable methods of managing their waste.  
2. Monitor levels of waste production for City businesses on the CCAS so that improvements in performance can be tracked.  
3. Work with City businesses to ensure that they are responsible for litter produced by staff whilst in the City.  
4. Support initiatives within the City which aim to maximise the re-use and recycling of demolition material in the construction of new buildings. | a. Produce guidance documents and host best practice meetings to share knowledge.  
b. Provide annual awards to reward examples of exceptional performance and improvement.  
c. Integrate information gathering within the CCAS so that a number of businesses can be utilised as a sample to build up a picture of the general trends of waste production within the City.  
d. Liaise with waste contractors on a regular basis to obtain factual and anecdotal evidence on key waste trends.  
e. Offer free advice for businesses on smoking related litter.  
f. To make businesses and employees aware of their responsibilities with regards to littering and ensure that reasonable enforcement actions are taken to deal with these issues.  
g. Liaise with construction developers and waste contractors on a regular basis to obtain data and anecdotal evidence on key waste management and trends. |

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<thead>
<tr>
<th>Objective 6</th>
<th>Target</th>
<th>Actions</th>
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</table>
| **Zero Waste to Landfill** | 1. To send zero waste to landfill by 2014. (As of July 2016, the City of London has achieved this target.) | a. Continue to use the Riverside Resource Recovery Energy from Waste Facility (EfW) at Belvedere.  
b. Explore contingency options in the event that the above facility is unavailable. |

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<tr>
<th>Objective 7</th>
<th>Target</th>
<th>Actions</th>
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</table>
| **Responding to Climate Change and Poor Air Quality** | 1. We will work with our contractors to establish a realistic carbon reduction target based on the details provided by our waste collection contractor in their tender documentation and information gathered from the first year of this contract.  
2. We will baseline our figures using the Greenhouse Gas Calculator for Municipal Waste.  
3. We will engage with our contractors to reduce their impact on PM10 (particulate matter) and NOx.  
4. We will baseline our current greenhouse gases emissions associated with waste management activities using the Mayor of London’s Greenhouse Gas Calculator for Municipal Waste. This will enable us to ensure that we collectively (along with other Local Authorities in London) meet the agreed lifecycle greenhouse gas emissions performance standard (FPS), and if needed ensure there are steps in place to meet the standard in the near future. | a. We will continue to transport waste by river to the EfW plant and we will investigate opportunities to transport recyclables and organics using the river.  
b. To work with our contractors to identify ways of improving air quality and reducing the carbon impact of the fleet and depot, including:  
   ■ Investigating the use of bio-diesel and/or low emission vehicles  
   ■ Educating the drivers on efficient driving methods to reduce the fuel usage.  
c. We will continue to keep up to date with the latest understanding on the impact of the waste management sector on carbon emissions and where possible respond accordingly. |
### Objective 8
**Effectively engaging and communicating**

We understand that we cannot realise our ambitions within this strategy without engaging with our residents, those visiting the City and other stakeholders, in new and dynamic ways.

#### Target
1. We are committed to developing and delivering targeted engagement and education campaigns in line with best practice methods, which will aim to effectively and positively change behaviour.

#### Actions
- a. Specific objectives will be set for each campaign we design and deliver.
- b. Where relevant link in to international, national and regional campaigns for example Recycling Week and Recycle for London campaigns.
- c. We will ask Recycle for London and WRAP to peer review our literature to ensure that it is in line with national branding guidelines as well as using standard iconography in our literature.
- d. Through training ensure that all those with direct contact with residents, City workers and visitors to the City (e.g. collection crews, caretakers and street sweepers) understand all the recycling services we provide.
- e. Work with private managing agents and landlords to educate their staff in the recycling services and encourage their residents to use the recycling services. Identify opportunities to use their communication channels to target residents.
- f. We will maintain accurate information on our website signposting residents to where in the City different items can be recycled/reused and ensure that FAQs are up to date and relevant to the needs of our residents.

### Objective 9
**Value for Money**

We are committed to ensuring that the services we provide are in line with “Value for Money” principles.

#### Target
1. Provide an excellent quality of service for the best possible price that will not exceed agreed resources and budgets and will minimise damage to the environment.

#### Actions
- a. Budget monitoring and control.
- b. Annual review of contracts etc.
6.1. Managing the delivery of the Strategy

We will manage and monitor the delivery of this updated waste Strategy to ensure it remains current and relevant within the local, national and European context, as well as to ensure compliance with government policy and guidance.

We intend to manage the delivery of this strategy through a Strategy Review Board (SRB), which will meet every six months. The SRB will consist of the management team within Cleansing Services and any other relevant people. The SRB will undertake a review which will cover the agenda outlined below. The day to day delivery of the strategy will be led by individuals responsible for the delivery of the objectives, as outlined in the action plan. In addition to this, objectives will be included in service area business plans, officers personal objectives and monitored through our appraisal process and regular one to one meetings.

Every six months the SRB agenda will conduct a review of the following key elements:

- Progress against objectives;
  - A report will be delivered by the lead officer for each objective
- Recommendations on changes required to the objectives
  - As each objective is reported on the relevance will be evaluated and changes discussed
- Risk assessment review report
  - An outline risk management framework that will be used to manage the delivery of the strategy is provided in Appendix 4
- Legislation, policy & targets
  - The review of any significant changes in policy that affect the objectives or indeed may require the addition of new ones
- Operational Infrastructure
  - Any changes which have been made that will have an effect on objectives or any additional operations that may need to be considered to assist in the delivery of the objectives
- Resourcing
  - A review to ensure there are sufficient resources in place in the following key areas: City of London internal staff, Operational staff, Contracts for collection and disposal and budget provision to deliver the service
- Waste Producers
  - The SRB board will consider any changes in waste arising’s, households and demographics of the residential population
- Strategy refresh decisions
  - Any changes to the strategy will be proposed and ratified by the SRB.

A high-level summary of how the objectives will be delivered and the main monitoring elements of each objective is provided in Appendix 5. An outline of the objectives monitoring report that will be completed quarterly is also provided in Appendix 5.

This Strategy will receive a full review every three years, with the first review scheduled for 2016/17. This will require the production of a committee report including the key areas outlined above.
7.1. Appendix 1: Legal requirements

This appendix outlines the main legal requirements regarding waste management that the City either already has to meet or will need to meet as new legislation and requirements are introduced.

European Waste Policy and Legislation

The European Union has become the major source of environmental legislation and guidance in relation to the management of waste. A number of European Directives which aim to increase levels of recycling and recovery, and thus reduce the amount of waste which is land filled have been introduced:

- Landfill Directive (1999/31/EC)
- Ozone Depleting Substances (Regulation 1005/2009)
- Directive on Batteries (2008/103/EC)


The Waste Framework Directive (WFD) entered into force on the 12th December 2008 and repealed the previous Framework Directive on Waste (75/442/EEC) and the Waste Directive (2006/12/EC). There are four main elements subject to revision by the new WFD:

1. A focusing of waste policy on improving the way that resources are used;
2. Introducing mandatory national waste prevention programmes, which take account of the national, regional and local conditions;
3. Improving the recycling market by setting environmental standards that specify the conditions under which recycled materials are no longer considered ‘waste’;
4. Simplifying waste legislation by clarifying definitions, streamlining provisions and integrating directives on hazardous waste (91/689/EEC) and waste oils (75/439/EEC) the latter with a focus on collection rather than regeneration which is no longer justified from an environmental perspective.
The main aim of the revised WFD is to promote waste prevention, increase recycling and enable better use of resources, whilst protecting the environment and human health. The key principles are:

1. **The Waste Hierarchy** – this provides a framework by which waste can be managed in a more sustainable way through moving waste management practices up the hierarchy, away from waste disposal to materials recovery activities and overall waste prevention/reduction.

   The new hierarchy differs from the previous hierarchy as it seeks to increase the use of waste as a resource and to place greater emphasis on the prevention and recycling of waste. The UK and other EU countries are required to take measures to encourage the options that deliver the best overall environmental outcome.

<table>
<thead>
<tr>
<th>New Waste Hierarchy</th>
<th>Old Waste Hierarchy</th>
</tr>
</thead>
<tbody>
<tr>
<td>A  Prevention</td>
<td>Reduction</td>
</tr>
<tr>
<td>B  Preparing for re-use</td>
<td>Re-use</td>
</tr>
<tr>
<td>C  Recycling</td>
<td>Recycling and Composting</td>
</tr>
<tr>
<td>D  Other recovery e.g. energy recovery</td>
<td>Energy Recovery</td>
</tr>
<tr>
<td>E  Disposal</td>
<td>Disposal</td>
</tr>
</tbody>
</table>

   The revision “Preparing for re-use” means checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so they can be re-used without other pre-processing. Under the previous hierarchy, reuse was outside the scope of waste management controls, and referred to any operation by which products or components that are not waste are used again for the same purpose for which they were conceived. “Preparing for re-use” includes items that have been discarded and have become waste. “Recycling” now encompasses organic waste that is processed by means of anaerobic digestion so long as the output is used on land.

2. **Regional Self-Sufficiency and The Proximity Principle** - This requires that waste should generally be managed as close as possible to where it is produced in order to limit the environmental impact of transportation and create a more responsible approach to waste generation. Thus each region is expected to provide sufficient facilities and services to manage the amount of waste it is expected to produce. However, as not all regions have specialist recovery, recycling or treatment facilities, it is recognised that the best solution for some waste may be to transport it to another region where it can be dealt with more effectively.

   Regulation 333/2011 on End of Waste came into effect on 9th October 2011 establishing criteria determining when certain types of scrap metal cease to be waste under the revised WFD. This will result in some changes to the producer responsibility regime for packaging and may also lead to permitting changes. The EU is likely to issue regulations on other waste streams in the future. The national end-of-waste criteria for England and Wales are set out in Quality Protocols determined by the Environment Agency.

   The requirements of the previous Framework Directive on Waste were implemented in the UK through the Environmental Protection Act 1990. This legislation defines the different categories of waste and how waste should be managed and controlled. It also defines the duties of Waste Collection and Waste Disposal Authorities, and sets out the Duty of Care applicable to all those handling and disposing of waste including householders.

   The revised WFD was implemented on the 29th March 2011 by the Waste (England and Wales) Regulations 2011. The Regulations also include amendments to the Hazardous Waste Regulations 2005 and amends the Environmental Permitting Regulations 2010.
The changes introduce the following:

- Require production of National Waste Management Plan by Spring 2013;
- Require the separate collection of waste paper, metal, plastic and glass from 1 January 2015;
- Requirement of businesses to apply the Waste Hierarchy when transferring waste and to include a declaration on their waste transfer note or consignment note;
- Applying the Waste Hierarchy will be a condition of new environmental permits and will be added to existing permits when they are reviewed;
- Amendments to hazardous waste controls and definition which mean that some non-hazardous wastes may not be reclassified as hazardous waste;
- Introduces a two-tier system for waste carrier and broker registration, which includes those who carry their own waste, and introduces a new concept of a waste dealer; and
- Exclude some categories of waste from waste controls as they are now controlled by other legislation, notably animal by-products and most radioactive wastes.

Amendments to the 2011 Regulations came into force on the 1 October 2012 through the Waste (England and Wales) (Amendment) Regulations 2012. These Regulations replace Regulation 13 of the 2011 Regulations so as to impose a duty on establishments and undertakings, from 1 January 2015, for the separate collections of waste paper, metal, plastic and glass. From this date, a further duty is imposed upon waste collection authorities, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection. Where it is “technically, environmentally and economically practicable”, these duties apply where separate collection is “necessary” to ensure that waste undergoes recovery operations in accordance with the WFD and to facilitate or improve recovery.

The Government Review of Waste Policy in England 2011 catalysed a change to fixed penalties for incorrectly presenting household waste for collection. The Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) (Amendment) Regulations 2012 (SI 2012/1151) apply from May 2012. These Regulations aim to ensure that fixed penalty levels for incorrectly presenting household waste for collection (an offence under Section 46 of the Environmental Protection Act 1990) are more reasonable and proportionate, by reducing the penalty range from £75 - £110 to £60 - £80, and reducing the minimum amount that applies upon early payment of the penalty from £60 to £40. The Regulations do so by amending the Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) Regulations 2007 (SI 2007/175). Consequently, changes were also made to the Environmental Protection Act through an Order that amends Section 47ZB to reduce the default monetary penalty (where none is specified) that an authority may impose a fixed penalty notice from £100 to £60 for the offence under Section 46 of the Environmental Protection Act 1990 of incorrectly presenting household waste for collection.

The City’s current waste collection and management procedures meet the requirements of the Waste Framework Directive and the Environmental Protection Act 1990.
Landfill Directive (1999/31/EC)

The main aim of the Landfill Directive is to prevent, or minimise the negative effects on both the environment and human health caused by landfilling of wastes. It has and will continue to have a significant impact on landfill practices in the UK as it bans certain materials from being landfilled, requires waste to be pre-treated before it is landfilled, and requires improvements to landfill management. The introduction of the Directive has resulted in a significant reduction in the number of landfill sites in the UK accepting hazardous wastes. The ban on landfilling of certain wastes, such as tyres, from 2006 has meant that new arrangements for their collection and management have been introduced.

Landfilled biodegradable waste is a major source of methane, which is a greenhouse gas over 20 times more potent than carbon dioxide in terms of global warming. The Landfill Directive requires the amount of biodegradable municipal solid waste sent to landfill in the UK to be reduced:

- to 75% of 1995 levels by 2010,
- to 50% of 1995 levels by 2013, and
- to 35% of 1995 levels by 2020.

In England and Wales, the Directive was brought into domestic legislation through The Landfill (England and Wales) Regulations 2002. The 2002 Regulations and amendments were replaced by the Environmental Permitting (England and Wales) Regulations 2007 which have since been revoked by the Environmental Permitting (England and Wales) Regulations 2010, which now implement the Landfill Directive and Council Decision 2003/33/EC establishing criteria and procedures for the acceptance of waste at landfills.

The Government implemented the requirements for landfilling of biodegradable waste through the Waste and Emissions Trading Act 2003 (WET Act). The WET Act sets Waste Disposal Authorities (such as City of London Corporation) annual allowances limiting how much biodegradable municipal waste (BMW) can be landfilled in any particular year with effect from April 2005. In October 2011, this was amended by the Waste and Emissions Trading Act 2003 (Amendment) Regulations 2011 which also makes amendments to the Landfill Allowances and Trading Scheme (England) Regulations 2004 (LATS) and the Joint Waste Authorities (Proposals) Regulations 2009 to reflect a new interpretation of the term ‘municipal waste’. The revised WET Act removes the provisions allowing supplementary penalties to be applied to Waste Disposal Authorities (WDAs) in England (previously the Government could fine WDAs for exceeding their allowances) but still allow Authorities to buy allowances from other Waste Disposal Authorities if they expect to landfill more than their allocation and sell their surplus if they expect to landfill less than their allowance.

The most recent landfill allowance targets of BMW, required by the WET Act, are allocated under the Landfill (Maximum Landfill Amount) Regulations 2011 (SI 2011/2299), stating both individual targets for England, Scotland, Wales, Northern Ireland as well as a collective targets for the UK as a whole to be achieved in 2013 and 2020.

The City’s updated waste Strategy outlines how we intend to meet or exceed these targets.
In March 2011, the EU announced that it intended to propose a phase-out of biodegradable waste going to landfill in 2020-2025 as part of the revision on the 1999 Landfill Directive. It will not be an outright ban in the first instance. The UK had four extra years to meet the Landfill Directive targets due to its historic reliance on landfill and any targets put in place for 2020-25 for the UK are likely to fall four years later in 2024-2029. It is expected to be several years before any legislative changes are made.

The new interpretation of the term ‘municipal waste’ will mean this term will no longer be used in the UK policies and nationally reported data to refer to waste collection by Local Authorities. Using this term is now considered ambiguous considering the definition in the EU Landfill Directive includes both household waste and waste from other sources which is similar in nature and composition. As a result, the following applies:

- **Local Authority Collected Municipal Waste (LACMW)** – refers to household waste and business waste where collection by the Local Authority and which is similar in nature and composition as required by the Landfill Directive. This is the definitions that will be used for LATS allowances.

- **Local Authority Collected Waste (LACW)** – a slightly broader concept referring to all waste collected by the Local Authority, both LACW and non-municipal fractions such as construction and demolition waste. LACW will be used in statistical publications, which previously referred to municipal waste.


The aim of the Directive is to reduce the amount of packaging waste sent for final disposal by introducing recovery and recycling targets for packaging waste. The UK initially implemented this Directive through the Producer Responsibility (Packaging Waste) Regulations 1997. Revised regulations were brought in under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007. The revised Regulations obligate certain companies to recover and recycle packaging waste to meet national targets and use the ‘polluter pays’ principle, making businesses who place products on the market take on some of the waste management costs of their products when they reach the end of their life.

The revised EU Directive of 2004 on Packaging and Packaging Waste did not increase the targets to recover 60% of all packaging waste by December 31 2008, and meet recycling targets for specific materials, which include a 60% recycling target for both glass and paper/board. Therefore this level of recovery and recycling must at least be achieved and sustained.

The packaging which is being collected in the City for recycling will contribute towards meeting the UK’s target.

The aims of this Directive are to require hazardous components to be removed from waste electrical and electronic equipment (WEEE), and to reduce the amount sent to landfill by introducing recovery and recycling targets. Some types of WEEE items, such as washing machines, are already being recycled, but additional systems for recycling items such as televisions and computers will need to be provided. The UK has implemented this Directive through the Waste Electrical and Electronic Equipment Regulations 2006, which requires manufacturers to meet the treatment and recycling costs for WEEE items from July 2007. A series of amendments have superseded the 2006 Regulations providing definitions, data reporting and streamlining.

An amended WEEE directive 2012/19/EU was published on 24 July 2012 and must be implemented into UK legislation by the 14 February 2014. Four years after taking effect, it is necessary to attain a minimum collection rate of 45% on the basis of the devices which had been placed on the market; seven years after taking effect it is necessary to attain 65% on the basis of the devices which had been placed on the market or alternatively 85% on the basis of the generated waste of used devices.

The City provides facilities for collecting these items from householders at Walbrook Wharf (which is classified as a designated collection facility for WEEE items), and householders can also use the Household Waste Recycling Centre located at Northumberland Wharf in Tower Hamlets. Collected items are sent to suitable recycling facilities.


The aims of this Directive are to require hazardous fluids (such as brake fluid) to be removed from end-of-life vehicles (ELVs) and to set recovery and recycling targets. Although ELVs are already being recycled, the Directive will require all ELVs to be treated in Authorised Treatment Facilities (ATFs) and manufacturers have been required to meet the treatment and recycling costs from 2007.

The Department of Trade and Industry introduced the first set of UK ELV regulations in November 2003. These introduced design standards for vehicle manufacturers and environmental standards for the dismantling, recycling and disposal of ELVs by ATFs. The second set of UK ELV regulations came into force in February 2005 and addresses how manufacturers will set up networks of ATFs to process vehicles at no cost to the last owners of the vehicle from 2007.

The current reuse and recycling targets are 80% by 2006 and 85% by 2015.

The City collects abandoned vehicles and sends them to a suitable facility for recycling.
Ozone Depleting Substances (Regulation 1005/2009)

The EU Ozone Depleting Substances (ODS) Regulation (EC) No. 1005/2009 was introduced in January 2010 replacing the previous Regulations (Regulation No. 2037/2000). The aim of this Regulation is to phase out the use of all ozone depleting substances (including CFCs and HCFCs) from, in particular, refrigeration equipment, air-conditioning units, fire-protection systems and heat pumps, before such appliances are recycled. In the UK the Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2011 (SI 2011/1543), implement the EU regulation and prescribe offences and penalties applicable to the infringements of the Regulation. The Ozone-Depleting Substances (Qualifications) Regulations 2009 (SI 2009/216) provide for minimum qualifications for those working on the recovery, recycling, reclamation or destruction of ODS and the prevention and minimising of leakages of ODS.

The City provides facilities for collection of refrigerators and freezers at Walbrook Wharf and householders can also use the household waste recycling centre located at Northumberland Wharf in Tower Hamlets. They are sent to a suitable facility which separates out the ozone depleting substances; the remaining materials are then sent for recycling.

Directive on Batteries (2008/103/EC)

The 2006 Batteries Directive (2006/66/EC) was amended by Directive 2008/103/EC whereby Member States are required to take necessary measures to ensure that batteries or accumulators which do not meet the requirements of this Directive are not placed on the market after 26 September 2008.

The original batteries Directive (91/157/EEC) only covered consumer batteries containing mercury, lead and cadmium above a certain threshold level. The new Directive requires collection schemes (financed by battery manufacturers) to be set up and these will need to collect 25% of household batteries by September 2012 and 45% by September 2016. The Batteries Directive is implemented in England, Northern Ireland and Wales by the Waste Batteries and Accumulators Regulations 2009 (SI 890) which establishes a legal framework and schemes for collecting, treating and recycling batteries. Most producers of portable batteries will finance collection and recycling of waste portable batteries by joining a Battery Compliance Scheme (BCS). The BCS take on the responsibility for meeting the Directive’s targets on behalf of its members.

Facilities for collecting lead/acid (car) batteries are provided at the Household Waste Recycling Centre located at Northumberland Wharf in Tower Hamlets. The City will assess options for collecting small household batteries.

This Directive ensures that energy from waste (EfW) incinerators continue to be tightly regulated in terms of their emissions, and sets minimum technical requirements for waste incineration and co-incineration. The Directive applies to all incinerators from the beginning of 2006, and has been implemented in the UK through the Environmental Permitting Regulations (England and Wales) 2010 which replaced the 2007 Regulations. In 2007, the Regulations combined the Pollution Prevention Control (PPC) and Waste Management Licensing (WML) Regulations. Their scope has since been widened to include water discharge and groundwater activities, radioactive substances and provision for a number of Directives, including the Mining Waste Directive.

The City will ensure that any combustion facility which treats waste produced in the City meets or exceeds all of the emission requirements set by this Directive.

UK waste policy

Although most waste legislation in the UK has been introduced to meet the requirements set by European Directives, the UK Government has also introduced additional legislation, some of which is specifically aimed at encouraging recycling:

- Waste Minimisation Act 1998
- The Animal By-Products (Enforcement) (England) Regulations 2011
- Household Waste Recycling Act 2004
- Clean Neighbourhoods and Environment Act 2005
- Local Government Act 1999 – Best Value Regime
- Mayor of London’s London Plan and Municipal Waste Management Strategy 2011


Landfill Tax is a tax payable for each tonne of waste sent to landfill and was introduced by the Government in 1996 as a way of encouraging more sustainable means of waste management through recognising the hidden financial effects of the environmental impact of landfill. The landfill tax, which is currently £64/tonne, has been set to increase at a rate of £8 each year from 1 April 2011 until at least 2014. There will then be a floor under the standard rate ensuring the rate will not fall below £80 per tonne from 2014/15 to 2019/2020.

This increase in landfill tax will cause a significant increase in waste disposal costs and will provide a further incentive to move to more sustainable means of waste treatment in the near future.

The City’s updated waste Strategy outlines how we intend to further reduce the amount of waste which is landfilled and thus reduce landfill tax costs.

Waste Minimisation Act 1998

The Waste Minimisation Act enables Local Authorities to implement schemes to minimise the amount of household waste which is generated. However, the Act does not place an obligation on authorities to carry out such initiatives, nor does it allow councils to impose any requirements on businesses or households in their area.

The new national waste strategy outlines a number of waste minimisation initiatives, and the City will work with other stakeholders to implement these measures.

16. At time of publication, February 2013)
The Animal By-Products (Enforcement) (England) Regulations 2011

The Regulations came into force on 23 March 2011 and replace Animal By-Products Order and Regulations 2005 (which previously revoked the Animal By-Products Order and Regulations 2003). The Regulations enforce the 2009 EU Animal By-Products Regulation (Regulation 2069/2009) which lays down health rules as regards animal by-products and derived products not intended for human consumption.

As a result of the foot and mouth crisis in the UK in 2001, the Government introduced legislation which states that any material that has possibly been contaminated by meat products has to be composted in a suitable composting facility. The impact of these new Regulations require kitchen waste to undergo ‘in-vessel’ composting or ‘anaerobic digestion’ in order to reduce pathogens to a specified level. Domestic kitchen waste can still be landfilled however the common open windrow composting methodology is no longer accepted. Facilities have to operate to certain standards and gain appropriate authorisation prior to operation, they are inspected by Animal Health and Veterinary Laboratories Agency.

Household Waste Recycling Act 2003

The aim of the Act is to increase recycling of household waste by requiring that English waste collection authorities (WCAs) should collect at least two types of recyclable material separately from the remainder of waste. Article 13 (2) of the Act defines commingled collection as a form of separate collection.

Clean Neighbourhoods and Environment Act 2005

The Clean Neighbourhoods and Environment Act deals with many of the problems affecting the quality of our local environment which forms part of a continuum with anti-social behaviour, vandalism, disorder and levels of crime.

The Act provides Local Authorities, parish and community councils and the Environment Agency with more effective powers and tools to tackle poor environmental quality and anti-social behaviour. In particular the Act includes sections on nuisance and abandoned vehicles, litter, graffiti, waste, noise and dogs. The section on waste covers flytipping, and enables Local Authorities to issue fixed penalty notices if waste is left out on the street.

The City enforce this legislation.

Local Government Act 1999 - Best Value Regime

All Authorities are required under the Local Government Act 1999 to provide “Best Value” services and to secure continuous improvement by regularly reviewing the economics, efficiency and effectiveness of their functions. Authorities have ‘Best Value Performance Indicators’ (BVPIs) for all of their services on which they are required to report annually. The BVPIs include a broad range of waste related measurements for example, the percentage of total household waste recycled.

The City’s aim is for each of the BVPIs for waste management to be better than the average for all Authorities in England.

Public Services (Social Value) Act 2012

The Public Services (Social Value) Act 2012 became law on the 8 March 2012. The Act, for the first time, places a duty on public bodies to consider social value ahead of procurement. The Act applies to the provision of services, or the provision of services together with the purchase or hire of goods or the carrying out of works. The authority must consider how what is proposed to be procured might improve the economic, social and environmental well-being of the relevant area, and how, in conducting the process of procurement, it might act with a view to securing that improvement. The City will adhere to this legislation when carrying out procurement exercises.


An updated waste strategy for England was published (following consultation during 2006) in May 2007. The aim of the updated National Waste Strategy, which sets the Government’s vision for sustainable waste management, is to reduce waste by making products with fewer natural resources, and thus breaking the link between economic growth and waste growth. Products should be re-used, their materials recycled, energy from waste recovered, and landfilling of residual waste should occur only where necessary. The key objectives are to:

- Decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and reuse.
- Increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste.
- Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste.
- Maximise the environmental benefit from that investment through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.

The main points of the National Waste Strategy 2007 are:

- A strong emphasis on waste prevention with householders reducing their waste (for example, through home composting and reducing food waste) and businesses helping consumers, for example, with less packaging. There will also be a new national target to help measure this.
- More effective incentives for individuals and businesses to recycle waste, leading to at least 40% of household waste recycled or composted by 2010, rising to 45% by 2015 and 50% by 2020. This is a significant increase on the targets (30% by 2010 and 33% by 2015) in the previous waste strategy (which was published in 2000).
- Plastics and aluminium - proposals (subject to further analysis) for higher packaging recycling requirements beyond the 2008 European targets to increase recycling (because of savings in carbon dioxide emissions).
- Increasing the amount of energy produced by a variety of energy from waste schemes, using waste that can’t be reused or recycled. It is expected that from 2020 a quarter of municipal waste - waste collected by Local Authorities, mainly from households - will produce energy, compared to 10% today.

Other measures include:

- Removing the ban on Local Authorities introducing household financial incentives for waste prevention and recycling, through early legislative change so Local Authorities would have the option to introduce revenue-neutral schemes (potentially reducing annual residual waste land filled by up to 15% – equivalent to 1.5 million tonnes or 130 kg per household).
- Government will work with the Direct Marketing Association to develop a service so that people will be able to opt-out of receiving unaddressed as well as addressed direct mail. The Government is also considering moving towards an approach where people would only get direct mail if they opted in by placing their name on the direct mail register.
- Government will work with retailers to reduce the use of free single use bags. This could involve retailers only selling long-life bags, or retailers charging for disposable bags and using the proceeds to sell long-life bags at a discount.
- Recycling extended from the home and office to public areas by providing recycling facilities in shopping malls, train stations and cinema multiplexes etc, so that recycling becomes a natural part of everyday life.
- Subject to further analysis and consultation, banning biodegradable and recyclable waste from being put into landfill sites.

The City’s updated waste Strategy outlines how we intend to meet or exceed these requirements in the longer term.
The Government Review of Waste Policy in England 2011 aims to move towards a ‘zero waste economy’ between 2012 and 2020 through Defra’s Structural Reform Plan. Underpinning the results of the review is the idea of waste as a resource. The approach in the revision is based upon a national approach to targets through market drivers rather than the existing interventionist approach at local level.

The Government believes that England is on target to recycle 50% of waste from households by 2020 and remains on course to meet the 2013 Landfill Directive Target.

In order to ensure England will meet its share of the UK’s 2020 target, the following is proposed:

- The abolition of the LATS which will end after the 2012/2013 scheme year as it is no longer considered an effective tool to ensure the delivery of EU landfill targets.

- Focusing on landfill tax as the driver of waste diversion from landfill by using the landfill tax escalator to drive waste away, inclusive of commercial waste managed by the private sector; rather than just focusing on household waste. This concept aligns with the revised definition of ‘municipal waste’.

- The review considered the introduction of additional legislative tools such as landfill bans or restrictions to achieve the Government’s aim. This includes introducing a restriction on the landfilling of wood waste, with the aim of diverting the substantial tonnages that end up in landfill to better uses higher up the waste hierarchy.

- A greater emphasis upon the role of waste derived fuels such as solid recovered fuel/refuse derived fuel (SRF/RDF) and the market for these is to be encouraged.

Other priorities are to:

- Accelerate recycling and reduce waste creation in the first place by providing incentives for householders, “recycling on the go” schemes, better services for businesses and voluntary responsibility deals focussing on the hospitality industry, paper, direct mail, textiles and construction waste. This includes Defra launching a £500,000 funding pot (Waste Prevention Fund) which will support businesses, social enterprises and councils in undertaking waste prevention activities.

- Alter bin fines and taxes while bringing in powers to deal with repeat fly-tipping offenders and genuine nuisance neighbours.

- Crack down on illegal fly-tippers who persistently and recklessly pollute the environment and countryside, including introducing appropriate powers to seize vehicles and penalties that might include offenders clearing up items they have dumped; and

- Consult on increased recycling targets to 2017 for plastic, steel, aluminium and glass.

Table 10 outlines the principal commitments made in the Review, in relation to two key areas. These commitments are shown below:

**Table 10: Principle Commitments of Government Review of Waste Policy in England 2011**

<table>
<thead>
<tr>
<th>Sustainable approach to the use of materials</th>
<th>Improve the service to Householders and Businesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Precedence efforts to manage waste in line with the waste hierarchy and reduce the carbon impact of waste</td>
<td>Support initiatives which reward and recognise people who do the right thing to reduce, reuse and recycle their waste.</td>
</tr>
<tr>
<td>Develop a range of measures to encourage waste prevention and reuse, supporting greater resource efficiency</td>
<td>Work with councils to increase the frequency and quality of rubbish collections and make it easier to recycle.</td>
</tr>
<tr>
<td>Develop voluntary approaches to reducing waste, increase recycling, and improve the overall quality of recycle material, working closely with business sectors and the waste and material resources industry</td>
<td>Encourage councils to sign the new Recycling and Waste Services Commitment currently being produced, setting out the principles they will follow in delivering local waste services.</td>
</tr>
<tr>
<td>Consult on the case for higher packaging recovery targets for some key materials.</td>
<td>Protect civil liberties by stopping councils from criminalising householders for trivial bin offences, while ensuring that stronger powers exist to tackle those responsible for fly-tipping and serious waste crime.</td>
</tr>
<tr>
<td>Support energy from waste where appropriate, and for waste which cannot be recycled</td>
<td>Support councils and the waste industry in improving the collection of waste from smaller businesses.</td>
</tr>
<tr>
<td>Work to overcome the barriers to increasing the energy from waste which Anaerobic Digestion provides, as set out in the new AD strategy</td>
<td>Reduce the burden of regulation and enforcement on legitimate business, but target those who persistently break the law.</td>
</tr>
<tr>
<td>Consult on restricting wood waste to landfill and review the case for restrictions on sending other materials to landfill.</td>
<td></td>
</tr>
</tbody>
</table>
Overall Government Ambitions
- Securing long-term supply of materials that are becoming scarcer
- Promoting the use of life cycle thinking in all waste management decisions.
- Establishing the right balances on services between convenience, cost and environmental benefits
- Preventing waste wherever it occurs as a priority

Local Authority Related Issues
- Better procurement and joint working between local councils
- Encouraging weekly household collections of food waste and processing food into compost or fuel
- Focusing on quality of recyclates passed to reprocessors
- Restricting the landfilling of wood waste
- Reviewing the landfilling of textiles and biodegradable wastes
- Focusing on enforcement on illegal waste sites and fly tipping
- Removing criminal sanctions applying to householders around minor waste infringements
- Councils to sign-up to the new Recycling and Waste Services Commitment
- Abolition of targets and the Landfill Allowance Trading Scheme (LATS)
- Supporting the Keep Britain Tidy ‘Love Where You Live’ campaign
- Seeking to pass EU fines on central government to local government

Business Related Issues
- Developing recycling services for business waste, especially Small to Medium Enterprises (SMEs)
- Consult on increasing recycling targets on packaging producers from 2013 to 2017
- Establishing a sub-target for recycling glass into re-melt applications
- Supporting greater use of responsibility deals with a focus on the retail, hospitality, direct mail and waste industry sectors

The Government will publish a follow up zero-waste action on waste prevention (Waste Prevention Plan) in December 2013 to check progress and address further developments under any new EU regulation. Alongside the review of waste policy, the Anaerobic Digestion Strategy and Action Plan was published and a £10m loan fund to stimulate strong growth in Anaerobic Digestion is to be administered by WRAP.

Planning Policy Guidance

National Planning Policies
Planning Policy Guidance (PPG) notes and their replacement Planning Policy Statements (PPS) are prepared by the Government following public consultation to explain statutory provisions and provide guidance to Local Authorities and others on planning policy and operation of the planning system. However, from the 27 March 2012 the system of PPGs and PPSs has been revoked and replaced by the National Planning Policy Framework (NPPF). However, waste was excluded from the NPPF due to new guidance being created in due course in the form of National Waste Management Plan for England (NWMP). This is due to be published in December 2013, until which date the PPS10 remains in force. Local Authorities preparing waste plans and taking decisions on waste applications should still have regard to the relevant policies in the NPPF.
Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10)

PPS10 was originally published in March 2005 to align with the objective of Government policy on waste set out in the ‘Strategy for Sustainable Development’ to protect human health and the environment by producing less waste and by using it as a resource wherever possible. PPS10 was updated in March 2011 to incorporate the new waste hierarchy set out in the WFD. The changes ensured that Local Authorities have regard to the waste hierarchy in the preparation of their waste plans, and that the waste hierarchy is capable of being a material consideration in determining individual planning applications.

National Planning Policy Framework (NPPF)

The NPPF provided the simplification of existing PPG and PPS through creating a single 52 page guidance document streamlining and revoking over 1000 pages. The shift in emphasis towards a presumption in favour of sustainable development.

The principles of the NPPF should be applied in Local Planning Authority Decisions on planning applications.

NPPF now states that the Local Plan is the plan for future development of the local area drawn up by the local planning authority in consultation with the community. In law, this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

The NPPF, as far as waste planning is concerned, is considered to be in favour of gaining planning permission for waste treatment plans as long as requirements are fulfilled which requires them to be sensibly sited, of innovative good quality design and whose significant adverse impacts are not outweighed by their benefits. Where possible, the NPPF states development should be on previously developed land (brownfield sites).

The London Plan 2011

The City is a Minerals and Waste Planning Authority and also has to ensure that its plans are in general conformity with the London Plan. The waste policies in the revised London Plan require boroughs to plan for the management of waste arising in their area by identifying suitable sites and allocating sufficient land to provide capacity to manage the tonnages of waste apportioned in the Plan. Boroughs may collaborate by pooling their apportionment requirements. To ensure that the City’s 100,000 tonne waste apportionment can be met, the City of London Corporation is working with the London Borough of Bexley, utilising spare waste management capacity in Bexley.

The key waste policies in the London Plan include:

- Working towards zero biodegradable and recyclable waste to landfill by 2031
- Setting recycling/composting targets of:
  - 50% for municipal waste by 2020, increasing to 60% by 2031
  - 70% C&I waste by 2020
  - 95% reuse and recycling for CDE waste by 2020
- Promoting waste management activities achieving the greatest possible climate change mitigation and energy saving benefits
- Managing as much of London’s waste within London as practicable, working towards managing 100% of London’s waste within London by 2031, and;
- Produce borough level projections of London’s waste arisings.
7.2. Appendix 2: Recycling services provided to residents

The Barbican Estate: residents living in the Barbican estate receive a five days a week doorstep collection of commingled recycling in a single use sack and food waste caddy. When a resident sets out recycling and/or food waste they receive another recycling single use sack and/or kitchen caddy liner.

At locations across the estate residents also have access to textile, WEEE and battery recycling containers.

Golden Lane Estate, Middlesex Street Estate and Mansell Street Estate: residents living in these estates receive a twice-weekly doorstep collection of commingled recycling in a single use sack and food waste collection. Single use recycling sacks and kitchen caddy liners are delivered to residents every six months. There are also textiles, WEEE and battery recycling containers located at each of these estates for residents to use directly.

Private blocks without bin stores: There are approximately 500 properties in the City that do not have a bin store. The residents living in these properties are able to recycle five days a week via a night time collection service. Residents are delivered single use recycling sacks every six months, and residents place these sacks on the pavement for collection between 6.30pm and 7.30pm Monday to Saturday.

Private blocks with bin stores: The service we provide to residents living in privately managed blocks in the City vary depending on the circumstances at each block. In general commingled recycling containers are located in the bin stores and residents take their recycling down to these containers at their convenience. Single use recycling sacks are provided to these residents to help them to participate in the service. The sacks are either delivered directly to residents, left with concierges or within bin stores. In some blocks the concierge / cleaners / porters undertake doorstep collection of refuse and recycling sacks. In these cases, the recycling sacks are provided to the managing agents and the concierge / cleaners / porters take the recycling (along with the refuse) down to the appropriate containers located in the bin stores.

In 2011, we received funding from the Waste and Resources Action Programme (WRAP) to implement the food waste collection service to all private blocks where practical at the time. We continue to identify opportunities to expand this service today.
7.3. Appendix 3: Recycling and refuse services provide to visitors

Manual street cleansing: We have a team of sweepers who work to clean the litter that is dropped in the City. In 2008 the sweepers were first provided with twin compartment barrows; one for recyclables and the other for general rubbish. They continue to separate out recyclable litter from non-recyclable litter as part of their new working practices.

Recycling bins: Historically, the City has had very few recycling bins located across the Square Mile. However, in a drive to change the behaviours of people and encourage more recycling we have started installing on street recycling bins. These bins are modern in design and meet the strict security requirements in the City.

Mechanical sweepings recycling: we use mechanical sweepers to clean some of the pavements and roads in the City. We send the grit that is collected by the sweepers for recycling into aggregates.

Litter bins: Historically the City has had very few general litter bins located across the Square Mile. Over the last 10 years we have located a small number of litter bins in litter hot spots across the City.

Cigarette litter: Smoking-related litter is a major issue for us in the City. We work in partnership with City businesses to reduce smoking-related litter. As part of our “No ifs, No butts” communication and awareness campaign, we have encouraged City businesses to install and take responsibility for servicing our “SmartBins” for cigarette litter. These bins can now be seen throughout the City. We service a number of the “SmartBins” and increasingly City businesses are installing the bins, which we are very supportive of.

Chewing gum litter: Chewing gum is very expensive to remove once it has been dropped. The “SmartBins” for cigarettes are also designed for chewing gum, and we encourage our visitors and residents to use these bins accordingly.
### 7.4. Appendix 4: An outline Strategy risk management framework

**Table 11: Risk Management Framework**

<table>
<thead>
<tr>
<th>Strategy Element</th>
<th>Sub element</th>
<th>Identified risks</th>
<th>Level of Risk L/M/H (RAG)</th>
<th>Mitigation measure</th>
<th>Level of risk post mitigation measure in place</th>
<th>Responsibility</th>
<th>Quarterly reporting on Change incl mvt in RAG rating</th>
</tr>
</thead>
</table>
| Resourcing                     | City of London Staff internal | Loss of key staff and skill sets  
Poor skills of in-house team |                           |                    |                  |                                             |                |                                                        |
| Operational staff              | Health and safety incident occurs  
Poor skills of operational team  
Loss of key staff |                      |                           |                    |                  |                                             |                |                                                        |
<p>| Contract with Amey             | Budget to deliver               |                                                   |                           |                    |                  |                                             |                |                                                        |
| Operational Infrastructure     | Equipment | Key equipment fails                                                          |                           |                    |                  |                                             |                |                                                        |
|                                | Contracts in place             |                                                   |                           |                    |                  |                                             |                |                                                        |
|                                | Alternative material outlets   |                                                   |                           |                    |                  |                                             |                |                                                        |</p>
<table>
<thead>
<tr>
<th>Strategy Element</th>
<th>Sub element</th>
<th>Identified Risks</th>
<th>Level of Risk L/M/H (RAG)</th>
<th>Mitigation measure</th>
<th>Level of risk post mitigation measure in place</th>
<th>Responsibility</th>
<th>Quarterly reporting on Change incl mvt in RAG rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategy Objectives</td>
<td>Objective leads identified</td>
<td></td>
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<tr>
<td></td>
<td>Objectives not appropriate</td>
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<tr>
<td>Legislation, policy and targets</td>
<td>Changes in EU/national/regional policies</td>
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<tr>
<td></td>
<td>Changes in local City of London policies</td>
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<tr>
<td>Waste Producers</td>
<td>Changes in waste arisings</td>
<td></td>
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<tr>
<td></td>
<td>Changes in number of households</td>
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<tr>
<td></td>
<td>Changes in demographics of residents (languages, transiency)</td>
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<tr>
<td>Strategic Reputation</td>
<td></td>
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</tbody>
</table>
7.5. Appendix 5: A high-level summary of how the objectives will be delivered and the main monitoring elements of each objective

Table 12: Summary of objective delivery and monitoring

<table>
<thead>
<tr>
<th>Objective</th>
<th>Actions to deliver the objective</th>
<th>Objective monitoring activities</th>
</tr>
</thead>
</table>
| 1. A resource efficient City of London Corporation | ■ Attend regular meetings with key contacts  
■ Assist in developing a baseline measure of stakeholders activities  
■ Provide support to identify opportunities for waste prevention, reuse and recycling initiatives and then support the development, implementation and improvement of these initiatives  
■ To share good practice amongst key stakeholders  
■ Promote success stories to wider audiences  
■ Where appropriate, work with key contacts to reduce the impact of their activities on street cleansing by encouraging the installation of our “SmartBins” for cigarette litter and chewing gum and recycling bins | ■ Minutes from meeting  
■ Estimates of baseline  
■ Monitoring activities to be developed in line with initiatives implemented |
| 2. Waste Reduction | ■ Love Food Hate Waste (LFHW) promotional campaign  
■ Promote real nappies  
■ No Junk Mail campaigns  
■ Smarter Shopping campaign – link to international, national and regional campaigns | ■ Monitor via total tonnes of arisings using weighbridge information (with calculation to exclude street cleansing wastes as appropriate)  
■ Develop database of all properties to record and track progress in providing safe and suitable services  
■ Identify through resident behaviour studies, the number of residents participating in the different initiatives  
■ Record the number of families applying for the Real Nappies incentive  
■ Record the number and types of promotions and campaigns delivered each year |
| 3. Reusing materials | ■ Explore Bulky Reuse Services  
■ Recycling Roadshows incorporating “Give and Take Days”  
■ Continue to promote the use of the textiles and WEEE banks on our four main estates and investigate the opportunities to bring these services to all our residents | ■ Monitor the tonnage diverted through the bulky waste reuse scheme  
■ Monitor the tonnage divert through “Give and Take Days”  
■ Identify through resident behaviour studies, the number of residents participating in the different initiatives  
■ Tonnage diverted through the textiles and WEEE banks |
<table>
<thead>
<tr>
<th>Objective</th>
<th>Actions to deliver the objective</th>
<th>Objective monitoring activities</th>
</tr>
</thead>
</table>
| 4. Recycling and Composting | ■ Carry out an audit of all existing properties to identify any properties that are eligible for additional facilities as they come on line (food waste, batteries etc)  
■ Look at the potential for increasing the range of materials collected through the doorstep collection  
■ Review the method by which recycling sacks and food waste liners are distributed to residents to identify ways to increase the accessibility of sacks.  
■ Regularly explore options that generate energy through the recycling of food waste such as Anaerobic Digestion (AD) plants whilst considering that any options must remain both economically and environmentally practicable.  
■ Keep abreast of developments and improvements to recycling and reprocessing technologies within the industry. | ■ Undertake waste audits to identify capture rates (ideally every two years)  
■ Undertake participation rate monitoring (ideally annually) to industry standards  
■ Track service provision by individual households and private blocks, set up spreadsheets to develop a comprehensive understanding of services provided to each household  
■ Develop a plan to fill the gaps and ensure equitable provision is provided, and can be demonstrated (i.e. may not be a service provided by the City, and instead, the City might direct residents to service providers or develop partnerships) |
| 5. To work with the City’s business community | ■ Produce guidance documents and host best practice meetings to share knowledge.  
■ Provide annual awards to reward examples of exceptional performance and improvement.  
■ Integrate information gathering within the CCAS so that a number of businesses can be utilised as a sample to build up a picture of the general trends of waste production within the City  
■ Liaise with waste contractors on a regular basis to obtain factual and anecdotal evidence on key waste trends.  
■ Offer free advice for businesses on smoking related litter  
■ To make businesses and employees aware of their responsibilities with regards to littering and ensure that reasonable enforcement actions are taken to deal with these issues  
■ Liaise with construction developers waste contractors on a regular basis to obtain data and anecdotal evidence on key waste management and trends | ■ Monitor businesses participating in the CCAS against targets annually  
■ Identify appropriate category sectors for businesses within the City. Calculate the percentage of businesses participating in the awards within each category using application / submission information. Calculate the percentage of businesses within each category within the City as a whole using information from Trading Standards or Council Tax departments and compare these percentages  
■ Develop (or use existing) system for gathering reported data and tracking year on year progress of businesses towards targets |
### Table 12: Continued - Summary of objective delivery and monitoring

<table>
<thead>
<tr>
<th>Objective</th>
<th>Actions to deliver the objective</th>
<th>Objective monitoring activities</th>
</tr>
</thead>
</table>
| 6. Zero Waste to Landfill | ■ Continue to use the Riverside Resource Recovery Energy from EfW Facility at Belvedere  
 ■ Explore contingency options in the event that | ■ Monitor disposal routes and weighbridge tickets to identify amounts of waste sent to landfill  
 ■ Record opportunities and changes in contract |
| 7. Responding to Climate Change and Poor Air Quality | ■ We will continue to transport waste by river to the EfW plant and we will investigate opportunities to transport recyclables and organic waste using the river  
 ■ To work with our contractors to identify ways of reducing the carbon impact of the fleet and depot, including:  
 ■ Investigating the use of bio-diesel  
 ■ Educating the drivers on efficient driving methods to reduce the fuel usage  
 ■ We will baseline our current greenhouse gases emissions associated with waste management activities using the Mayor of London’s Greenhouse Gas Calculator for Municipal Waste. This will enable us to ensure that we collectively (along with other Local Authorities in London) meet the agreed lifecycle greenhouse gas emissions performance standard (EPS), and if needed ensure there are steps in place to meet the standard in the near future. | ■ Our contractor will continue to monitor the carbon impact of the fleet using TriScan recording system and the depot using electricity consumption  
 ■ Baselining of current greenhouse emissions related to waste management activities.  
 ■ Re-evaluating emissions performance standard when considering new options for the treatment of waste or recyclables. |
| 8. Effectively engaging and communicating | ■ Specific objectives will be set for each campaign we design and deliver  
 ■ Where relevant, link in to international, national and regional campaigns  
 ■ Training relevant staff in the recycling services  
 ■ Effectively engage private managing agents and landlords  
 ■ We will maintain accurate information on our website signposting residents to where in the City different items can be recycled/reused and ensure that Frequently Asked Questions are up to date and relevant to the needs of our residents. | ■ Baseline monitoring to be conducted as appropriate for each campaign. Basic general monitoring activities would include annual surveys of different stakeholder groups (householders, City staff, visitors and businesses), tonnages of different materials collected from different sources, capture rates, participation rates and assessments of street cleanliness  
 ■ Develop template plan to be completed for each campaign including objectives and monitoring plan and ensure high level sign off prior to campaign commencing.  
 ■ Develop and implement process for evaluation of campaign  
 ■ Record the number and types of promotions delivered each year  
 ■ Record the number of residents directly engaged with at events e.g. Recycling Roadshows on the four main housing Estates  
 ■ Number of staff trained each year |
<table>
<thead>
<tr>
<th>Objective</th>
<th>Actions to deliver the objective</th>
<th>Objective monitoring activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Value for Money</td>
<td>■ Budget monitoring and control.</td>
<td>■ Monitor total costs spent on different services (including variation orders etc.)</td>
</tr>
</tbody>
</table>
7.6. Appendix 8: Consultation Responses and Recommendations

Q1. We propose to undertake a lot of work with stakeholders to engage them about waste and recycling issues to help achieve our waste strategy objectives. What would be the best method for engaging with yourself and other stakeholders?

- a) Leaflets/Direct mail
- b) Workshops
- c) Stalls at community events
- d) Social media
- e) Website
- f) Other, please state: ____________________________

Responses summary

The majority of respondents said engagement with stakeholders about waste and recycling issues would be effective through a combination of methods, rather than one single method. Of the 34 respondents that answered the question, 66 responses were given (respondents were able to provide more than one response). Engagement through direct mail and the City of London’s website were the most popular methods of communication.

Figure 1 shows the results of the responses. Email was an additional suggested method of communication and other individual suggestions included a stall outside the Guild restaurant and posters at relevant sites.

City of London responses

We (The City of London) will ensure that our communications cover a variety of engagement methods in order to reach as many stakeholders as possible.

We have already undertaken to update elements of the website to improve access to and quality of information provided in response to a survey carried out by The Society of Information Technology Management (SOCITM).

In addition to leaflets and direct mail, face-to-face communication is seen as an essential engagement tool which we currently use and will continue to do so.

We also have a growing presence on social media, hosting our own Twitter feed (@GreenSqMile) and posting events and important information to the City of London’s corporate Facebook page.
Figure 1: Best method of engagement responses

- Leaflets: 6
- Direct mail: 9
- Social media: 7
- Workshops: 8
- Stalls at community event: 18
- Website: 18
- No reply: 2
Q2. Workshops and engagement with businesses – should be provided, although the form which this should take was not list of all acceptable waste recyclers for businesses to choose from for businesses could be implemented. It was also suggested that a practices was considered important. It was suggested a points system leading and those that are lagging in waste management and recycling studies and improving knowledge sharing between those that are reduce any reservations about the fate of recyclates. Providing case stage of the recycling process would influence decision making and suggested this could include the provision of strategies for management accessible information and guidance, including best practice. It was two respondents.

We propose to continue to operate the Clean City Awards Scheme and Considerate Contractors’ Scheme. What more do you think we could do to help support local businesses manage their waste more sustainably?

<table>
<thead>
<tr>
<th>Responses summary</th>
<th>City of London responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>32 stakeholders responded to this question and gave a range of suggestions focussed at increased communication, including face-to-face visits and events, and incentives including financial, obligatory rules and punishment. The responses have been split into key areas below:</td>
<td>Information and guidance – The Clean City Awards Scheme (CCAS) is in the process of changing the way in which it is delivered. The application and inspection process is being streamlined so that our officers can spend more time on developing best practice advice, forums and meetings. We are keen to be a key resource for City businesses wanting to improve their waste management practices and the Clean City Awards Scheme is the most appropriate forum to continue to do this.</td>
</tr>
<tr>
<td><strong>Information and guidance</strong> – Respondents were keen to see clear and accessible information and guidance, including best practice. It was suggested this could include the provision of strategies for management and staff. Providing information on what happens to recycling at each stage of the recycling process would influence decision making and reduce any reservations about the fate of recyclates. Providing case studies and improving knowledge sharing between those that are leading and those that are lagging in waste management and recycling practices was considered important. It was suggested a points system for businesses could be implemented. It was also suggested that a list of all acceptable waste recyclers for businesses to choose from should be provided, although the form which this should take was not communicated by the stakeholder.</td>
<td></td>
</tr>
<tr>
<td><strong>Workshops and engagement with businesses</strong> – Engaging both large and small businesses through face-to-face visits or through workshops were suggested as support tools. Other suggestions included, offering tailored support to Small and Medium sized Enterprises (SMEs) and employing a ‘waste champion’ to regularly visit shops and businesses to advise on waste reduction, correct recycling practices and the benefits of recycling. The visits could be used to promote the Clean City Awards Scheme. Engaging landlords of business premises to offer better recycling service (i.e. more waste streams) could also support local businesses.</td>
<td><strong>Workshops and engagement with businesses</strong> – Our Clean City Awards team host four best practice events each year. These consist of a variety of speakers and are free for any City businesses to attend. These events are well attended but could be promoted more widely to non CCAS members.</td>
</tr>
<tr>
<td><strong>Incentives/subsidies</strong> – Eight respondents believed offering incentives would encourage local businesses to manage their waste more sustainably. Four of these same respondents did not suggest the type of incentive to implement. The other four respondents suggested these incentives should be financial:</td>
<td><strong>Incentives/subsidies</strong> – We are not in a place to offer monetary incentives to businesses but see our role more as highlighting the economic and environmental benefits which can be realised by responsibly managing waste. We will as far as is reasonable provide this advice to businesses for free.</td>
</tr>
<tr>
<td>■ Target big businesses to cooperate or provide sponsorship to help other businesses</td>
<td><strong>Bylaws</strong> – We will investigate the possibility of these suggestions but would like to stress that our focus is more on encouraging stakeholders to recycle.</td>
</tr>
<tr>
<td>■ Introducing a noticeable price difference between recyclable and refuse waste collections</td>
<td><strong>Fines/Penalties</strong> – We would prefer to encourage recycling rather than implement fines. The City of London works closely with the distributors of free newspapers to ensure they are distributed and disposed of responsibly.</td>
</tr>
<tr>
<td>■ Reduced business rates if local cafes use limited packaging on take away food</td>
<td><strong>Service</strong> – Our commingled collection is currently the most technically, environmentally and economically practical (TEEP) method of collecting recyclables from residential properties. We are however monitoring legislation changes and best practice guidance and would consider other collection methods should they become feasible. We do not directly provide a commercial waste collection at present, and businesses within the Square Mile have the option of choosing any collection contractor who may or may not collect materials separately.</td>
</tr>
<tr>
<td>■ Higher subsidies for those with better waste management</td>
<td>Our Recycling and CCAS team will engage with the City of London Access Group to assess the provision of waste and recycling services and to see if any improvements can be made.</td>
</tr>
</tbody>
</table>
### Question 2 continued...

<table>
<thead>
<tr>
<th>Responses summary continued</th>
<th>City of London responses continued</th>
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</thead>
<tbody>
<tr>
<td><strong>Fines/penalties</strong> – Implementing ‘hefty’ fines and penalties for non-compliance of adhering to correct recycling practices was suggested by three respondents. A further suggestion to make free newspaper distributors more responsible for their discarded newspapers was made.</td>
<td>End of response...</td>
</tr>
</tbody>
</table>
| **Service** – Two suggestions were made regarding sorting, however differing opinions arose. One respondent suggested supporting businesses through providing more sorting of recyclables after collection so businesses do not have to sort the waste themselves, whereas another respondent suggested providing increased services to make it easier for businesses themselves to sort recycling. As part of the Clean City Awards Scheme, one respondent suggested involving the City of London Access Group as it is a really good scheme that is viewed positively by disabled people | }
Consultation Responses and Recommendations continued...

**Q3. We will provide services and run campaigns in response to the waste hierarchy and national and Mayoral waste strategies, in order to meet our objectives. What services or campaigns would you like to see us run to meet our challenging waste reduction, reuse, recycling and composting targets?**

<table>
<thead>
<tr>
<th>Responses summary</th>
<th>City of London responses</th>
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<tbody>
<tr>
<td>33 stakeholders responded to this question. One respondent suggested that any campaigns run by the City of London must be well communicated and given sufficient exposure. Suggestions from respondents have been grouped under key headings below:</td>
<td></td>
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<tr>
<td><strong>Public Education Campaigns</strong> – Educating and raising awareness were common themes amongst respondents, including an emphasis on collective and individual responsibility. A repeated suggestion was the provision of advice on the different types of recyclates, what items can and cannot be recycled, including advice on the different recycling symbols and what to do with hazardous waste. Educating the public on what happens to waste and recycling, including the cost implications of landfill tax for the City of London and how this impacts Council Tax were also suggested. There were mixed opinions on the impact of the recycling service, one respondent believed a campaign emphasising the ease of recycling would help the City of London meet their objectives, whilst another respondent suggested making it easier to reuse, recycle or compost but did not suggest how.</td>
<td><strong>Public Education Campaigns</strong> – We will take all of these suggestions into consideration when planning future campaigns and will design all communications with this in mind.</td>
</tr>
<tr>
<td><strong>Work with businesses</strong> – Three suggestions were aimed at businesses, including communicating at the right level to get the message across; it was suggested office managers will have greater influence over waste practices. A suggestion was made to provide a service to weigh businesses’ waste and offer rebates to businesses that can demonstrate a significant reduction in their waste. It was also suggested that the City of London should work with large corporations, such as Tesco, to reduce packaging on their products.</td>
<td><strong>Work with businesses</strong> – The CCAS aims to communicate with as many businesses as possible, but it is acknowledged that more resources need to be dedicated to recruiting new members to the scheme. The majority of the contacts the CCAS has with businesses are via facilities managers. This has proven to be a good method of affecting change and is also a route into senior executives. We are members of a number of London-wide and national bodies who represent our views to government and producers of packaging to reduce the amount of unnecessary material entering the waste stream.</td>
</tr>
<tr>
<td><strong>Working with residents and estate managers</strong> – Direct contact with estate managers and with boards and housing committees was suggested by two respondents as a means of ensuring good waste and recycling management practices were administered by residents. One problem highlighted was the high turnover of residents in rented accommodation, namely the Barbican Estate, and how this impacts the misuse of recycling facilities. One respondent suggested targeting small developments and individual homes through door-to-door visits by knowledgeable persons.</td>
<td><strong>Working with residents and estate managers</strong> – Our recycling team have a good working relationship with the managers of all of the estates within the City. Whilst landlords and managing agents of private blocks are more challenging to engage with efforts are being made to establish as many contacts with them as possible and we will continue to develop these links going forward.</td>
</tr>
<tr>
<td><strong>Service provision</strong> – Increasing the number of on-street recycling bins, including food waste recycling bins, and better access to recycling. It was suggested these should be installed in public areas, such as the Podium of the Barbican Estate and emptied after lunch periods.</td>
<td><strong>Service Provision</strong> – Last year (2012) we introduced 100 additional on-street recycling units which have proved successful in capturing on average 12 tonnes per month of recyclables. We are also trialling additional units in parks and are constantly seeking ways to improve our on-street recycling provision. Although the City work closely with the Barbican Estate, we cannot place bins on the public areas (this is the responsibility of the Barbican Estate) however we will contact the management team there to establish if this is a possibility.</td>
</tr>
<tr>
<td><strong>Working with schools and children</strong> – One respondent suggested encouraging children to think about ways to re-use items and make items out of waste, as well as encouraging schools to support the collection of old shoes and clothes and export to third world countries.</td>
<td><strong>Working with Schools and children</strong> – This forms a key part of the work which our recycling team carry out and is incorporated into individual Officer’s objectives.</td>
</tr>
</tbody>
</table>
**Q3.**

<table>
<thead>
<tr>
<th>Responses summary continued</th>
<th>City of London responses continued</th>
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<tbody>
<tr>
<td><strong>Specific schemes</strong></td>
<td><strong>Specific Schemes</strong></td>
</tr>
<tr>
<td>Some respondents outlined specific schemes targeted at specific waste streams or individual items that they believe will help the City of London meet their challenging waste targets:</td>
<td>Plastic Bags – this will be picked up through the CCAS scheme and the advice given to businesses on an individual basis</td>
</tr>
<tr>
<td>■ Plastic bags – encourage businesses in the City to provide a bag recycling facility or make their customers pay for plastic bags</td>
<td>Bulky Waste – We provide a weekly bulky waste and bulky reuse service for all residents as well as opportunities to attend bi-monthly “Give and Take” days on the four City Estates.</td>
</tr>
<tr>
<td>■ Bulky waste – a bi-monthly campaign to remove bigger items</td>
<td>City coffee cup – there are several large companies who offer this service already. This has been encouraged and promoted through the CCAS best practice meetings.</td>
</tr>
<tr>
<td>■ City coffee cup – provide coffee shops and restaurants with reusable cups and encourage them to offer discounts if they are used rather than takeaway cups</td>
<td>Cigarettes – We are currently working with the NHS in order to promote and encourage smoking cessation clinics. This year this has been included as a specific section in the CCAS application pack and companies will be rewarded for taking up this service.</td>
</tr>
<tr>
<td>■ Cigarettes – administer a campaign in partnership with a health campaign to reduce both health risks and cigarette litter. Also carry out engagement with businesses and increased on-street enforcement</td>
<td>Littering – We are working hard to discourage all forms of littering, this includes issuing fixed penalty notices to perpetrators and the erection of gum and butt bins wherever feasible. This will continue to be a strong focus for the cleansing department.</td>
</tr>
<tr>
<td>■ Littering – identifying and addressing the root causes of littering, including putting up signage to encourage pedestrians to take responsibility for their litter</td>
<td></td>
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</table>
Consultation Responses and Recommendations continued...

**Q4. Overall, how challenging do you think our objective to reduce our negative impact on climate change is?**

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<tr>
<th>Responses summary</th>
<th>City of London responses</th>
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<tbody>
<tr>
<td>All 36 respondents provided a response to this question. 66% (24) believed that ‘Objective 7: Responding to Climate Change’ was challenging or very challenging, 11% (4) of respondents stated the objective was either not at all challenging or not very challenging and 22% (8) of respondents believed it was in between not at all challenging and very challenging. Figure 2 illustrates the responses.</td>
<td>In addition to the targets already within the updated Strategy we will be slightly amending the title of the objective to include Air Quality. We will also baseline our current service using the Mayor of London’s Greenhouse Gas Calculator for Municipal Waste.</td>
</tr>
</tbody>
</table>

**Figure 2: Climate change objective**
Q5.

How do you think we could provide better waste and recycling services and/or achieve better value for money?

**Responses summary continued**

30 stakeholders responded to this question. 13% (4) respondents expressed their satisfaction with the current waste and recycling service provided by the City of London. One respondent suggested that waste management will always be expensive and that City managers, residents and business owners must accept more responsibility. The consultation results largely fell under four categories: service provision, incentives, collection and reprocessing.

**Service provision** – Increasing on-street waste and recycling bins, one respondent suggested a ‘recycling venue’ by the Barbican. Increased separation at source by providing more bins, including composting, was suggested by four respondents. There was also an emphasis on providing greater information on what can and cannot be recycled, as well as the high value of recyclates. Suggestions include photocards or photographs on the website, this will help identify what should happen to non-obvious items such as toothpaste tubes, empty glass make-up bottles and worn-out reusable plastic bags. Providing storage facilities within City of London owned estates and properties for the reuse of packaging was also suggested by one stakeholder.

**Incentives** – It was suggested that better value for money could be achieved through financial means including reductions in council tax charges to change behaviour, charging for a waste and recycling service with tiered rates (with a lower cost for recycling and composting) and fines and penalties for those that do not separate their recyclates from their refuse.

**Collection** – Collection rounds were highlighted as a way to achieve better value for money; it was suggested that the City of London could add more resources to rounds such as a member of staff accompanying the contractor on the round to visit businesses and by implementing spot checks for separation of waste and recycling. Using electric vehicles for collection was also suggested. Furthermore, it was suggested that measuring and monitoring performance will help improve the service.

**Reprocessing** – Four suggestions were made in relation to reprocessing including ensuring the full lifecycle impact is taken into consideration when selection contractors. One respondent suggested EfW should be used rather than landfill, another emphasised that green and food waste should be sent for Anaerobic Digestion, and another suggested cigarette butt recycling equipment should be used which cleans the filters and recycles them into insulating material.

**City of London responses continued**

Service provision – Last year (2012) we introduced 100 additional on street recycling units which have proved successful in capturing on average 12 tonnes per month of recyclables. We are also trialling additional units in parks and are constantly seeking ways to improve our on-street recycling provision. We have investigated the possibility of on-street food waste units but feedback from other Local Authorities and best practice guidance indicate that such units are impractical, costly and result in high levels of contamination.

We recently included an AtoZ of recycling on the website and will continue adding to this as queries are received and avenues for additional recyclables found. Suggestions for better provision of information will be included in future communications and the outline action plan which will be a result of the strategy.

Incentives – The City of London would rather encourage recycling rather than implement fines. We have considered several incentives schemes and are monitoring the progress and relative benefits of schemes in other London boroughs. Should a system become financially viable and show significant benefits then it would certainly be considered.

Collection – We only operate one round each for the collection of household refuse, recycling and food waste. The efficiencies to be gained are therefore minimal.

We have a clear policy in place to reduce vehicle emissions and any new vehicles which are purchased are assessed on fuel consumption and efficiency.

Reprocessing – Environmental impacts formed a key part of the evaluation process undertaken when selecting our current collection contractor. In addition to this a full lifecycle analysis was undertaken when selecting the destination for our residual waste which is sent to an Energy from Waste facility.

We will investigate the possibility of cigarette recycling and will apply the Technically, economically and Environmentally Practical (TEEP) principals when assessing its viability.
Consultation Responses and Recommendations continued...

| Q6. Overall, how much do you agree that the objectives laid out meet the overall aims of the waste strategy? |
|---|---|
| **Responses summary** | **City of London responses** |
| Of the 34 individuals that responded to the question, 68% either agreed or strongly agreed that the objectives laid out meet the overall aims of the waste strategy; 32% neither agreed nor disagreed and no respondents disagreed. Figure 3 illustrates the results from responses to this question. | No response. |
Figure 3: Objectives and aims of the waste strategy
Consultation Responses and Recommendations continued...

Q7. Please rank our waste strategy’s objectives in order of importance to you:

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<tr>
<th>Responses summary</th>
<th>City of London responses</th>
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<td></td>
<td>The respondents were asked to rank the nine objectives in order of importance, giving the most important a “1” and the least important a “9”. The objectives were then scored in relation to the rankings assigned by stakeholders, where an objective ranked as the most important it would receive a score of nine and an objective ranked as the least important would receive a score of 1. Table 1 shows the frequency of each ranking in relation to the objectives and the total attributed scores. 36 stakeholders responded to this question in total. Figure 4 illustrates the results of the total scores.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective</th>
<th>Ranking</th>
<th>Total Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Becoming more resource efficient</td>
<td>5 5 3 3 7 4 3 3 3</td>
<td>193</td>
</tr>
<tr>
<td>Waste reduction</td>
<td>12 7 3 2 2 4 2 2 2</td>
<td>235</td>
</tr>
<tr>
<td>Reusing material</td>
<td>4 5 9 2 3 7 4 1 1</td>
<td>209</td>
</tr>
<tr>
<td>Recycling and composting</td>
<td>5 2 7 10 4 2 2 2 2</td>
<td>210</td>
</tr>
<tr>
<td>To work with the City’s business community</td>
<td>6 3 4 3 3 4 6 1 6</td>
<td>181</td>
</tr>
<tr>
<td>Zero waste to landfill</td>
<td>9 4 3 2 4 1 6 3 4</td>
<td>198</td>
</tr>
<tr>
<td>Responding to climate change</td>
<td>6 2 1 1 3 8 2 7 6</td>
<td>156</td>
</tr>
<tr>
<td>Effectively engaging and communicating</td>
<td>4 4 1 5 5 1 4 9 3</td>
<td>167</td>
</tr>
<tr>
<td>Value for money</td>
<td>3 3 4 1 3 2 4 3 13</td>
<td>139</td>
</tr>
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</table>

Table 1: Frequency of rankings per objective

The ranking of importance of the nine waste strategy objectives is very interesting and will feed into the development of the action plan.
Figure 4: Importance of objectives

- Waste reduction (Objective 2)
- Recycling and composting (Objective 4)
- Reusing material (Objective 3)
- Zero waste to landfill (Objective 6)
- Becoming more resource efficient (Objective 1)
- To work with the City’s business community (Objective 5)
- Effectively engaging and communication (Objective 8)
- Responding to climate change (Objective 7)
- Value for money (Objective 9)
Consultation Responses and Recommendations continued...

**Q8.** Do you think all of the objectives listed are necessary, and do you have suggestions for any additional objectives that you think we should consider?

<table>
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<tr>
<th>Responses summary</th>
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<tbody>
<tr>
<td>The results of this question provides greater insight into respondents’ opinions about the objectives. 28 stakeholders responded to this question, 10 (36%) of which were happy with all nine objectives, many of which commented on the interrelated nature of the objectives that were all necessary and important to achieve waste reduction. Responses were either related to objectives that respondents did not think were required, amendments to objectives or additional objectives. Responses are summarised below in relation to specific objectives that were mentioned and additional objectives that should be considered.</td>
<td></td>
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</table>

- **Objective 2** – Waste Reduction: One respondent believed this objective should include businesses and not just residents. Another respondent believed setting this target would encourage dumping.

- **Objective 5** – To work with the City’s business community: Two respondents highlighted that businesses will have their own waste strategies and therefore this is perhaps not necessary.

- **Objective 6** – Zero waste to landfill: One respondent believed this objective was unrealistic.

- **Objective 7** – Responding to Climate Change: Three respondents did not believe this objective was appropriate, reasons included believing it was not something to be worried about and it being out of place in a waste strategy as it is a much larger problem. One stakeholder suggested assessing the carbon impact of all waste management activities to strive to meet the Mayor’s CO₂ equivalent emission performance (EPS) as set out in Policy 2 of his Municipal Waste Management Strategy, not just the carbon impact of our fleet and depot.

- **Objective 8** – Effectively engaging and communicating: This objective was deemed unnecessary by one respondent who believed it was self-evident and not specific.

- **Objective 9** – Value for money: One respondent believed that value for money should not be considered where the environment is concerned. Another respondent believed this objective was not a specific objective.

**Additional objectives** – A number of additional objectives were suggested for the City of London to consider:

- **Composting and Green solutions** – prioritising disposing of food waste in this way and set up visible schemes e.g. urban garden

- **Emphasis on people** – the City should engage with people not legal entities, including a meaningful analysis of the categories of people concerned e.g. pedestrians; drivers; residents; tourists.

- **Supply chain management** – to ensure waste does not end up exported to Third World countries

- **Objective 2** – the main scope of the Strategy is residential waste as this is the only portion of waste which we have direct responsibility for. However we realise that we are in a position to influence businesses and construction companies and aim to deliver the message of waste minimisation through the CCAS.

- **Objective 5** – We believe that we have a responsibility to offer assistance and advice to City businesses to help them manage their waste as sustainably as possible.

- **Objective 6** – We are currently achieving zero waste directly to landfill and are investigating contingency plans to cover all eventualities.

- **Objective 7** – The way in which we manage our waste has a significant impact on climate change. As part of the action plan we will develop a baseline using the Mayor of London’s Greenhouse Gas Calculator for Municipal Waste.

- **Objective 8** – We believe it is key to engage effectively with all key stakeholders within the City.

- **Objective 9** – Value for money is a key consideration for us as a Local Authority, services and contracts will always be evaluated in a balanced way taking into consideration a number of factors including value for money and the environment.

- **Composting and Green solutions** – We provide a doorstep food waste collection from all properties where possible, and will investigate the possibility of community composting and urban gardening schemes.

- **Emphasis on people** – the City attempts to engage with all of its stakeholders as fully as possible.

- **Supply chain management** – the City regularly requests end destinations of its materials to ensure that they are being managed responsibly.

- **Constructors policy** – The Recycling Team will work in partnership with the Considerate Contractors Scheme to ensure that as far as possible construction waste within the City is being managed as responsibly as possible.

- **Air quality** – The City will be including air quality in its Climate Change Objective. This will be monitored through the management of the collection contract.
Q8. Question 8 continued...

<table>
<thead>
<tr>
<th>Responses summary continued</th>
<th>City of London responses continued</th>
</tr>
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<tbody>
<tr>
<td>■ <strong>Constructors policy</strong> – emphasising the disposal of demolition materials</td>
<td>End of response...</td>
</tr>
<tr>
<td>■ <strong>Air quality</strong> – Two stakeholders were keen to see air quality incorporated into this strategy, either as a separate objective or through combining air quality with climate change. It was suggested that nitrogen oxide and particle emissions from Refuse Collection Vehicles should be considered when awarding contracts for waste collection and street cleansing.</td>
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</table>
Consultation Responses and Recommendations continued...

<table>
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<tr>
<th>Q9.</th>
<th>If there are any other views you would like to offer us to help improve the waste strategy, please let us know.</th>
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<tbody>
<tr>
<td></td>
<td><strong>Responses summary</strong></td>
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<tr>
<td></td>
<td>The majority of other views were re-emphasising points that respondents had already made throughout the responses to the other consultation questions. One stakeholder would like to see the City of London commit to continuous improvement and lessening of environmental impact. The majority of responses were related to information and service provision.</td>
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<td></td>
<td>- Information and education: emphasis was placed on the sharing of information and the provision of information including identifying and categorising plastics, educating stakeholders on the end-to-end value chain of waste, and providing clear signage and labelling including pictures for international visitors.</td>
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<td></td>
<td>- Service provision: more bins in the streetscape, including better disabled access, working with chain café establishments, such as Eat and Pret, to reduce their packaging, ensuring bulky waste is catered for, keeping storage areas clean and tidy and placing locks on WEEE bins in the Barbican Estate. Redesigning food waste bins in order to limit the access of foxes was also suggested.</td>
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</tbody>
</table>
Q10. Are you responding as a:
   a) City of London resident
   b) Employee in the City of London
   c) Visitor to the City of London
   d) Other Stakeholder (please specify)

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<tr>
<th>Responses summary continued</th>
<th>City of London responses continued</th>
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<tbody>
<tr>
<td>38 responses were given to this question as three of the responding stakeholders both worked and lived in the City of London and thus provided two responses. 50% of respondents were residents of the City, 42% worked in the City, only one respondent (3%) was responding as a visitor and two respondents (5%) classed themselves as ‘other stakeholder’. These stakeholders consisted of a commercial retail tenant and a ‘waste service customer’. Figure 5 illustrates the results of the categories of the respondents.</td>
<td>No response.</td>
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</table>

Figure 5: Respondents Role in the City
Consultation Responses and Recommendations continued...

Q11. If there are any other views you would like to offer us to help improve the waste strategy, please let us know.

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<thead>
<tr>
<th>Responses summary</th>
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<tbody>
<tr>
<td>Where postcodes were provided (34 in total), it is possible to see the areas from which respondents live and work, with a large majority coming from in and around the Barbican Estate, shown in Figure 6 below.</td>
<td>No response.</td>
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</table>

**Figure 6:** Map of Respondents in the City that provided postcodes
Q12. If responding on behalf of a business, how many persons does it employ within the City of London?

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<tr>
<th>Responses summary continued</th>
<th>City of London responses continued</th>
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<tr>
<td>Of the 16 responding stakeholders that worked in the City, 10 respondents provided the number of employees the business they were responding on behalf of employed. 60% employed 0-60 and 30% employed more than 500, one (10%) did not know. Figure 7 illustrates the results.</td>
<td>No response.</td>
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</table>

**Figure 7: Employee size of business**
GLOSSARY

Anaerobic Digestion (AD)
The degradation of waste by bacteria in an environment that is oxygen free and this usually takes place in an enclosed vessel. The process generates a biogas that has similar properties to natural gas so can be used as a fuel source.

Arisings
Arisings in this document refers to waste arising, which simply means waste products.

Biodegradable and Biodegradable Municipal Waste (BMW)
The Landfill Directive defines biodegradable waste as “waste that is capable of undergoing anaerobic or aerobic decomposition, such as food and garden waste, and paper and paperboard”.

Bulky waste
Bulky waste is:
Any article of waste which exceeds 25 kilograms in weight; and/or
Any article of waste which does not fit, or cannot be fitted into:
(a) a receptacle for household waste provided in accordance with Section 46 of the Environmental Protection Act 1990; or
(b) where no such receptacle is provided, a cylindrical container 750 millimeters in diameter and 1 metre in length.

Carbon
Refers to carbon dioxide equivalent.

Clean City Awards Scheme (CCAS)
Awards Programme run by the City of London to encourage the responsible management of waste i.e. adherence to waste legislation as well as the encouragement of more sustainable waste management practices i.e. waste prevention, reuse, recycling and composting.

Climate change
The term climate change is commonly used to mean global warming, but it also includes natural changes in the Earth’s climate. Climate change refers to the build up of man-made gases in the atmosphere that trap the sun’s heat, causing changes in weather patterns on a global scale. Effects include changes in rainfall patterns, sea level rise, potential droughts, habitat loss and heat stress.

Clinical waste
Waste produced in healthcare or similar activities that pose a risk of infection or waste that may prove hazardous as defined in the Controlled Waste Regulations.

Commercial and Industrial waste (C&I)
Controlled waste arising from the business sector. Commercial waste is waste arising from the activities of wholesalers, catering establishments, shops and offices. Industrial waste is waste generated by factories and industrial plants.

Commingled materials
A commingled collection scheme is where more than one type of recyclable material is placed by the householder in the same container for collection. In order for commingled materials to be sorted into types for reprocessing, it will need to go through a dedicated facility which can sort/separate these materials. This is known as a Materials Recovery Facility (MRF).

Composting
Anaerobic (in the presence of oxygen) biological process in which organic wastes, such as garden and kitchen waste, are converted into a stable material which can be applied to land to improve soil structure and enrich the nutrient content of the soil.

Considerate Contractors Scheme
The Considerate Contractor Scheme (CCS), pioneered by the City of London in 1987, aims to encourage building and civil engineering contractors working in the City to carry out their operations in a safe and considerate manner, with regards to pedestrians and road users.

Construction, Demolition and Excavation waste (CDE)
Waste arising from the building or destruction/refurbishment of the built environment and/or from excavation activities.

Department for Environment, Food and Rural Affairs (DEFRA)
The Government department responsible for the environment, food and rural affairs. Defra’s remit, within the environment, includes waste management.

Digestate
Material arising from biological treatment facilities (AD); consisting of structural plant matter which is often high in nutrients such as nitrates and phosphates.
Energy from Waste (EfW)
Is a term generally applied to any waste treatment process that creates energy in the form of electricity or heat. It is most widely applied to waste incinerators that are designed to use the heat produced to generate steam which drives a turbine to produce electricity.

EU Landfill Directive
Adopted by Member States during 1999, the EU Landfill Directive is intended to reduce the environmental impact of the landfilling of waste by introducing uniform standards throughout the European Union. The main objectives are to stimulate recycling and recovery of waste and to reduce emissions of methane (a powerful greenhouse gas).

EU Waste Framework Directive (WFD)
Sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products. The WFD lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest.

Fixed Penalty Notice (FPN)
Fine for anti social behaviour and practices following enforcement action taken by public authorities in England, Scotland and Wales.

Golden thread
A concept developed by City of London to link the organisational vision and values with day to day services, the thread is made up of five themes: quality, inclusion, environment, promotion, people.

Greater London Authority (GLA)
Consisting of the Mayor of London and the London Assembly, headquartered in City Hall, the GLA has been responsible for strategic local government since 2000.

Greenhouse gas
One of a number of gases (including methane and carbon dioxide) that can contribute to climate change via the 'greenhouse' effect when atmospheric concentrations exceed certain levels.

Home composting
The manufacture of compost material at home (from the breakdown of certain food and garden waste) using a compost heap, a purpose-made container or a wormery.

Household waste
Covers: waste from household collections, street sweeping, bulky waste collections, hazardous household waste collections, litter collections, separate garden waste collections, waste from recycling centres for household waste and waste collected separately for recycling/composting schemes.

Household Waste Recycling Centres (HWRC)
A facility provided by Local Authorities that is accessible to local residents for the deposit of household waste that is not collected by the normal household waste collection round.

Index of multiple deprivation
UK government statistical study of deprived areas in UK Local Authorities, used for benchmarking purposes.

Landfill / Landfill Sites
A waste disposal site for the deposit of the waste onto or into land. Landfill sites are often located in disused quarries or mines. In areas where these are limited, or there are no ready-made voids, the practice of ‘land raising’ is sometimes carried out. Here, waste is deposited above ground and the landscape is contoured.

Landfill Allowance Trading Scheme (LATS)
Sets out restrictions for disposal by each Local Authority in England and Wales. LATs permits each waste disposal authority (WDA) to sell its yearly quota of landfill allowances to other WDAs, creates financial incentives for good performance and encourages WDAs to maximise alternatives to landfill. LATs will be abolished at the end of 2012/2013 as it is no longer considered an effective tool to ensure the delivery of EU landfill targets.
Landfill Tax Regulations

Introduced in October 1996, this tax is levied on landfill site operators with the explicit environmental objective of reducing the UK’s reliance on landfill as a means of disposal. The level of the tax was £24 a tonne during 2007/08, and increased by a further £8/year from April 2008 to £48 in 2010/2011. A lower rate of £2/tonne applies to waste which is inert. This rate increased to £2.50 per tonne in April 2008.

Love Food Hate Waste

A campaign, launched by the Waste & Resources Action Programme (WRAP) in 2007, with the aim of reducing the amount of food waste in the United Kingdom.

Mailing Preference Service (MPS)

A suppression file set up by the direct mail industry to enable consumers to have their names and home addresses in the UK removed from lists used by the industry to reduce mail related waste.

Materials Recovery Facility (MRF)

A MRF is a facility at which components of a mixed waste stream, in this case of commingled dry recyclables are extracted by the use of mechanical separation techniques.

Mayor of London’s Emissions Performance Standard (EPS)

This is a metric that considers the overall carbon impact of waste management activities and the carbon intensity floor sets the minimum CO2eq that can emitted from turning London’s local authority collected waste to energy.

The Greenhouse Gas Calculator is a free tool that can be used to determine the emissions of an authority’s unique waste management solutions, based on a lifecycle assessment methodology. The tool also calculates whether the option meets the Mayor’s emissions performance standard and carbon intensity floor.

Mayor of London’s Municipal and Business Waste Strategies


Municipal Waste

All waste generated by the Local Authority’s activities. Municipal waste includes household waste from residents, street cleansing arisings and commercial waste from those businesses in the area that have requested a collection of their waste, waste from Parks, Markets waste and waste that has been dumped or flytipped.

NOx

NOx is a generic term for mono-nitrogen oxides NO and NO2 (nitric oxide and nitrogen dioxide). They are produced from the reaction of nitrogen and oxygen gases in the air during combustion, especially at high temperatures. In areas of high motor vehicle traffic, such as in large cities, the amount of nitrogen oxides emitted into the atmosphere as air pollution can be significant.

Organic waste

Waste material of animal or plant origin.

Procurement

The process of acquiring goods, works and services, covering the acquisition from third parties and from in-house providers. The process spans the whole life cycle from identification of needs through to the end of a service contract or the end of the useful life of an asset.

PM10

Particles come in a wide range of sizes. Those less than 10 micrometers in diameter (PM10) are so small that they can get into the lungs, potentially causing serious health problems. Particle pollution (also known as “particulate matter”) in the air includes a mixture of solids and liquid droplets. Some particles are emitted directly; others are formed in the atmosphere when other pollutants react.

Quality protocol

The purpose of a Quality Protocol is to provide a uniform control process for producers, from which they can reasonably state and demonstrate that their product has been fully recovered and is no longer a waste.

RAG Report

RAG rating for issues or status reports, based on the Red, Amber, and Green colors used in a traffic light rating system.

Recyclate

Raw material sent to, and processed in, a waste recycling plant or Materials Recovery Facility (MRF).

Recycling

This is the collection and separation of materials from waste and subsequent processing to produce marketable products.

Refuse Derived Fuel (RDF)

A high caloric value produced from the combustible waste that can be stored and transported, or used directly on site to produce heat and/or power.

Residual/refuse

Non-recyclable waste materials.

Reuse

This is a term used to describe a second or further use for an item/product. It usually means another use of an item in its original form e.g. a second hand car or bike but also covers things like re-usable packaging. The processes contribute to sustainable development and can save raw materials, energy and transport costs.

Solid Recovered Fuel (SRF)

A residual waste derived fuel resulting from a mechanical biological treatment process that can be produced to a specific quality and composition. SRF can be converted to energy in an energy plant.
Strategy Review Board (SRB)

The board which will be set up to meet every six months to review progress of this updated waste Strategy.

Sustainable City Awards (SCA)

The Sustainable City Awards aims to recognise, reward and promote innovation and leadership in sustainability.

Transfer station

A site to which waste is delivered for sorting prior to transfer to another place for recycling, treatment or disposal.

Unitary Authority

A Local Authority which, in the context of waste management, has the combined responsibilities for both waste collection and waste disposal. The City of London Corporation is a Unitary Authority.

Value for Money

As defined by the Chartered Institute of Public Finance and Accountancy (CIPFA) and details the principles of Value for Money (VfM).

Waste apportionment

The waste apportionment is the proportion of London’s waste which each Local Authority must plan for; as required by (and set out in) the London Plan.

Waste disposal authorities (WDA)

Were established in the United Kingdom following the Environmental Protection Act 1990. WDAs are in charge of the use of funds from Council Tax to facilitate the disposal of municipal waste. The City is not a WDA but a Unitary Authority (see above).

Waste hierarchy

Suggests that the most effective environmental solution may often be to reduce the amount of waste generated – waste reduction; where further reduction is not practicable, products and materials can sometimes be used again, either for the same or different purposes – re-use; failing that, value should be recovered from waste, through recycling, composting or energy recovery from waste, only if none of the above offer an appropriate solution should be disposed.

Waste reduction

Action to prevent waste being produced in order to reduce or minimise the amount of waste requiring final disposal. Minimising waste saves on collection and disposal costs and helps to reduce the demand for raw materials.

Waste Resources Action Programme (WRAP)

A national organisation, set up by government, to promote sustainable waste management by working to create stable and efficient markets for recycling materials and products, by removing barriers to waste minimisation, re-use and recycling.

Waste treatment

The mechanical, chemical, thermal or biological processing of certain wastes in order to make them harmless, reduce volumes before landfilling or recycle them.

WEEE

Waste electrical or electronic devices.

Zero waste economy

A zero waste economy will have the following characteristics: resources are fully valued – financially and environmentally; one person’s waste is another’s resource; over time, there is zero landfill; a new public consciousness in our attitude to waste.