

[www.defra.gov.uk](http://www.defra.gov.uk)

# Summary of responses to the consultation on the 'Incentives for Recycling by Households'

October 2007

Department for Environment, Food and Rural Affairs  
Nobel House  
17 Smith Square  
London SW1P 3JR  
Telephone 020 7238 6000  
Website: [www.defra.gov.uk](http://www.defra.gov.uk)

© Crown copyright 2007

Copyright in the typographical arrangement and design rests with the Crown.

This publication (excluding the royal arms and departmental logos) may be re-used free of charge in any format or medium provided that it is re-used accurately and not used in a misleading context. The material must be acknowledged as crown copyright and the title of the publication specified.

Information about this publication is available from:

Defra  
Area 6C  
Ergon House  
Horseferry Road  
London, SW1P 2AL  
Tel: 020 7238 4376 or 4371

Email: [LAWFG@defra.gsi.gov.uk](mailto:LAWFG@defra.gsi.gov.uk)

This document is available on the Defra website: <http://www.defra.gov.uk/>

Published by the Department for Environment, Food and Rural Affairs.

1. This document reports on the response to the above consultation by analysing the views expressed in response to each question, and the numbers of respondents giving various answers. We have sought to categorise the most common answers given by respondents, while including less common responses as “others”.
2. Text summarises the main points made by respondents, and includes some comments by some key stakeholders. Charts show the categories and views of respondents<sup>1</sup>.
3. During the consultation period, Defra officials discussed the proposals on financial incentives with several groups of stakeholders, primarily composed of local authority waste officers and waste practitioners. A summary of the key issues emerging from these discussions is provided in annex A.

## **Background**

4. England currently disposes of 63% of its municipal waste via landfill. Landfill sites are responsible for producing methane, a powerful greenhouse gas - and disposal of waste to landfill represent a waste of resources. Challenging targets for waste minimisation and recycling in Government’s Waste Strategy for England 2007, alongside EU targets for a reduction of biodegradable municipal waste sent to landfill, and our international and domestic obligations to reduce greenhouse gas emissions, mean that local authorities need residents to take steps to reduce their waste, home compost and recycle more. If residents do not change their behaviour authorities may need to invest in more expensive waste technologies and may face financial penalties.

5. The Local Government Association, and some local authorities, have previously called for the power to charge householders according to the amount of non-recyclable waste they throw away, in order to incentivise them to reduce their waste, home compost and recycle more. Sir Michael Lyons has recommended that local authorities be given the power to introduce charging schemes for household waste, in close consultation with residents and other stakeholders.

6. The Government consulted on a proposal to introduce a power to allow local authorities to implement revenue-neutral schemes to financially incentivise householders to reduce and recycle waste, where this is desired locally. Three options were considered in the consultation paper: option A – do nothing; option B – a localised waste charge; and option C – a waste financial incentive with net neutral impact upon local residents. The Government expressed its preference for option C in the consultation and invited comments on a number of questions around these options.

## **Analysis**

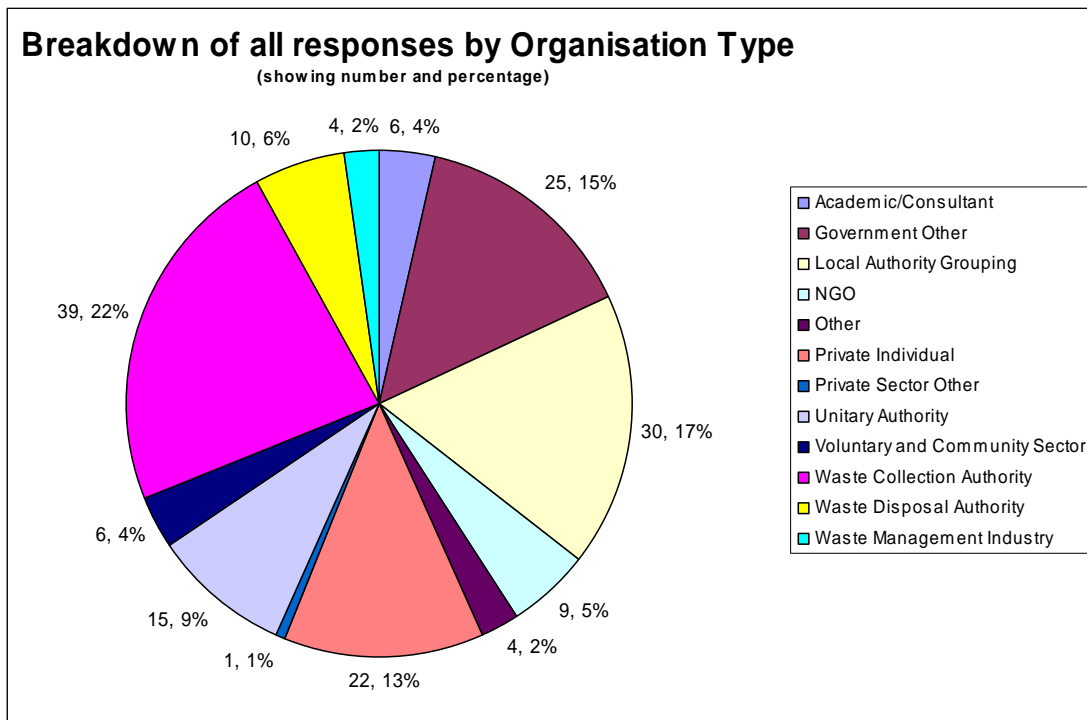
---

<sup>1</sup> The charts giving breakdowns in answers to the questions include those who did not answer – this explains the difference in percentage figures on graphs compared to supporting text.

7. 171 responses to the formal consultation were received and have been taken into account in this analysis. There were some responses that could not be included in this analysis either because they did not address the specific questions asked in the consultation, or because they were submitted too late for this analysis. However we have noted the views expressed by all those who responded. The following table and chart show a breakdown of types of respondent who answered the consultation questions:

**Types of respondent**

Waste Collection Authority	39
Waste Disposal Authority	9
Unitary Authority	15
Local Authority groupings	30
Voluntary and Community Sector	6
Government Other	26
NGO	9
Waste Management Industry	4
Private Sector Other	1
Private Individual	22
Academic/consultant	6
Other	4
<b>Total</b>	<b>171</b>



8. “Government-other” includes some Parish Councils, Regional Assemblies and organisations such as the Environment Agency, the Local Government Association (LGA), the Waste and Resources Action Programme (WRAP) and the Local Authority Recycling Advisory Committee (LARAC)<sup>2</sup>. “Local authority

<sup>2</sup> LARAC was heavily involved in the development of the LGA response to this consultation and fundamentally agrees with the LGA’s position. Therefore they asked that we consider the

groupings” include official local authority waste partnerships (for example Merseyside Waste Partnership and Somerset Waste Partnership), joint responses from a number of authorities, and representative bodies such as London Councils.

9. A full list of the organisations which responded is provided in annex B.

### **Power to introduce financial incentive schemes**

10. Local authorities are currently prohibited from charging householders for collection of household waste (with certain exceptions including bulky waste and green waste). The Government is proposing to lift this restriction on local authorities, allowing them to introduce financial incentives schemes relating to non-recycled household waste.

11. The Local Government White Paper, of 26 October 2006, sets out the Government’s intention to empower local communities by giving them greater freedoms and powers to improve public services. The nature of the waste management challenges faced by authorities varies according to local circumstances. The Government believes that allowing authorities to determine locally how these challenges should be met is an important part of increasing local flexibility as part of the Government’s local choice agenda.

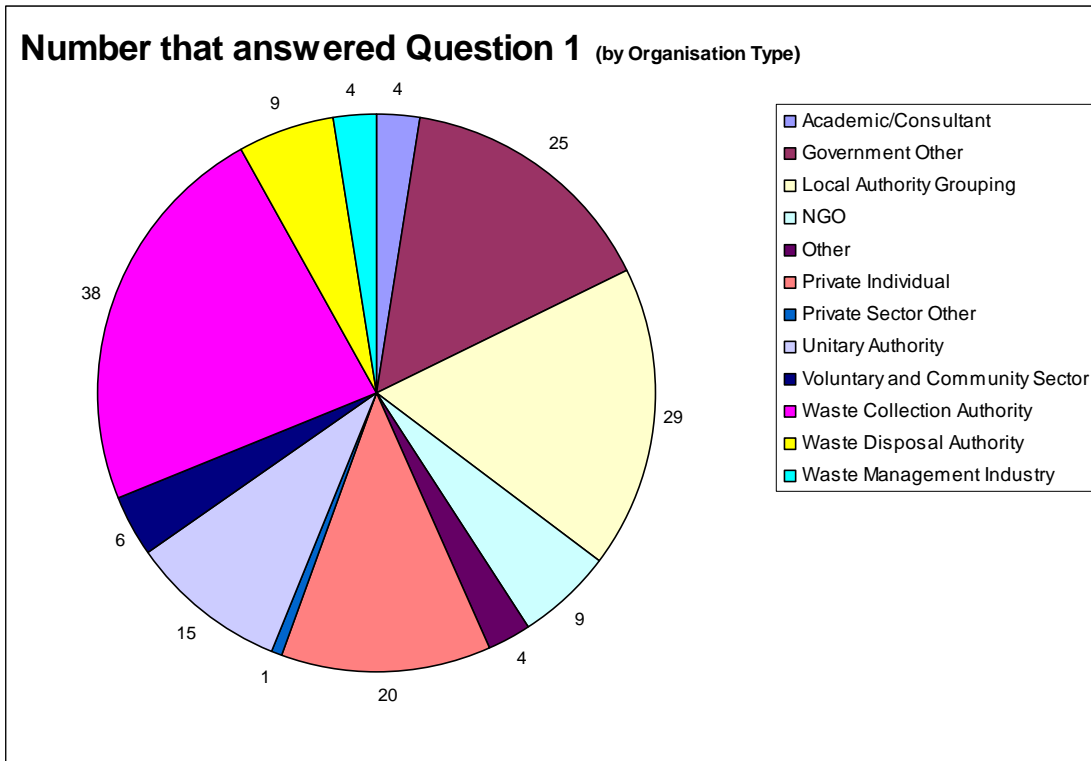
12. In the consultation paper Government proposed the removal of restrictions, to allow local authorities to introduce financial incentive schemes, where desired locally. The consultation sought views on the Government’s proposals to grant local authorities this power.

13. Consultees were asked the following questions:

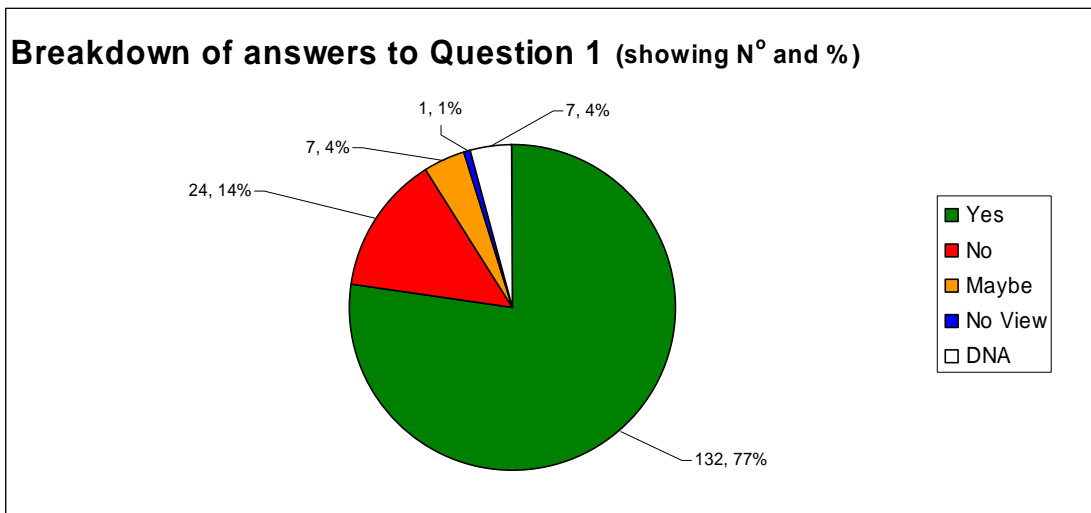
**Do you agree that local authorities should have the power to introduce financial incentives for promoting recycling and reducing household waste? Why? (Q1)**

**Do you agree that a power to introduce financial incentives would help local authorities to meet their recycling targets and their obligations under the Landfill Allowances Trading Scheme? (Q2a)**

14. **Question 1** had 164 responses, broken down into respondent types in the following chart:

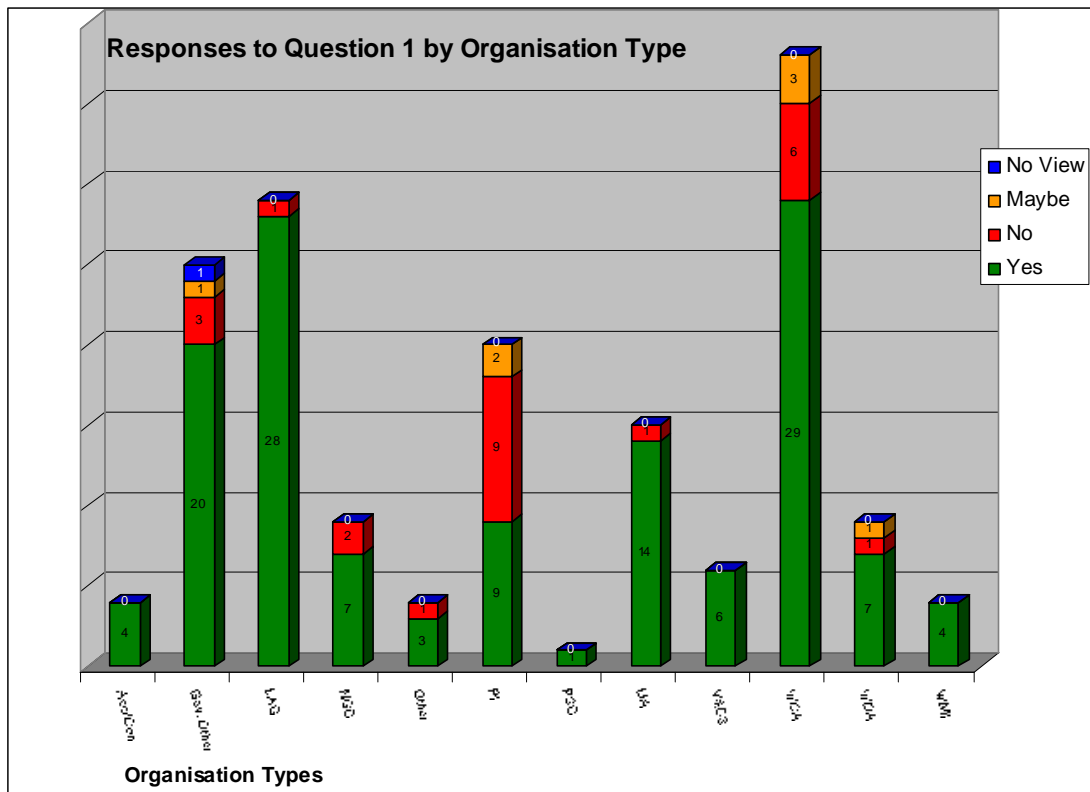


15. 132 (80.5%) of the 164 respondents who gave their view on whether local authorities should have the power to introduce financial incentives scheme agreed that this power should be given. The following chart shows the views of all respondents:



Key: DNA = did not answer

16. The following chart breaks down the answers by organisation type:



Key: Acc/con – academic/consultant; LAG – local authority groupings; NGO – Non-Governmental organisation; PI – private individuals; PSO – private sector other; UA – unitary authorities; V&CS – voluntary & community sector; WCA – waste collection authorities; WDA – waste disposal authorities.

17. Local authority respondents were largely in favour of the proposed new powers, with 78 for and nine against. Other groups of respondents were largely in favour. Private individuals were the only respondent type who were evenly divided between those who agreed (nine responses) and those who did not (nine responses).

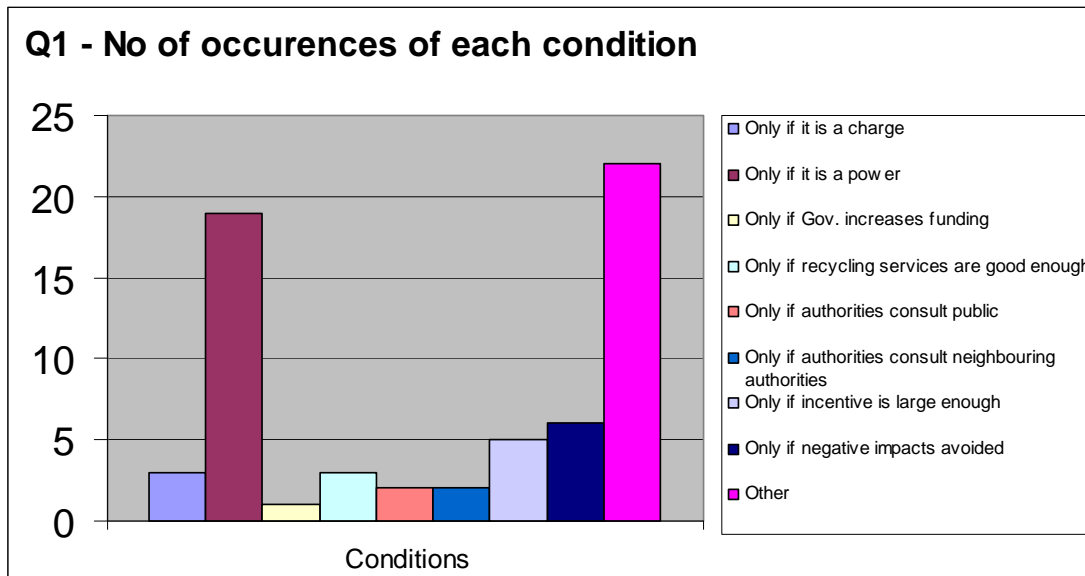
18. The LGA position statement on waste financing is that the Government should give councils a power to charge householders direct for waste management, with reduced payments for less waste. This would reflect the 'polluter pays' principle and would influence household behaviour. changes. They add the provision of a power (rather than a duty) allows local authorities to take into consideration their local circumstances. Schemes must be visibly directed at increasing recycling and rewarding members of the public who contribute to that, not raising revenue.

19. The Chartered Institution of Wastes Management (CIWM) said the incentives scheme could have success in encouraging householders to think about recycling and reducing waste.

20. The Environmental Services Association (ESA) pointed out that incentive-based schemes reflect the polluter pays principle of aligning good environmental conduct with benign economic outcomes.

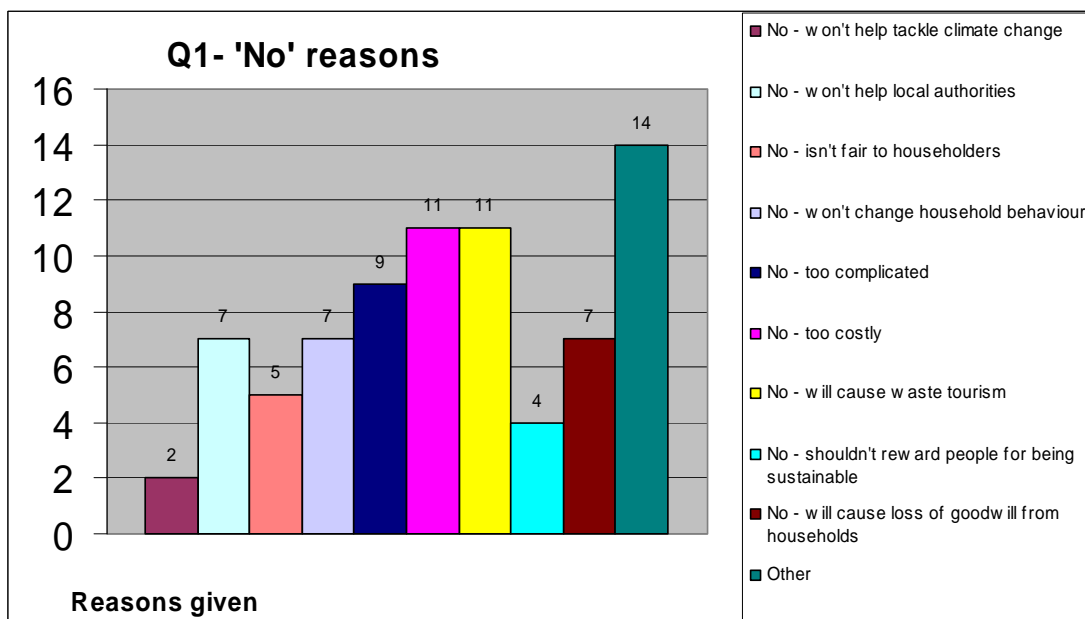
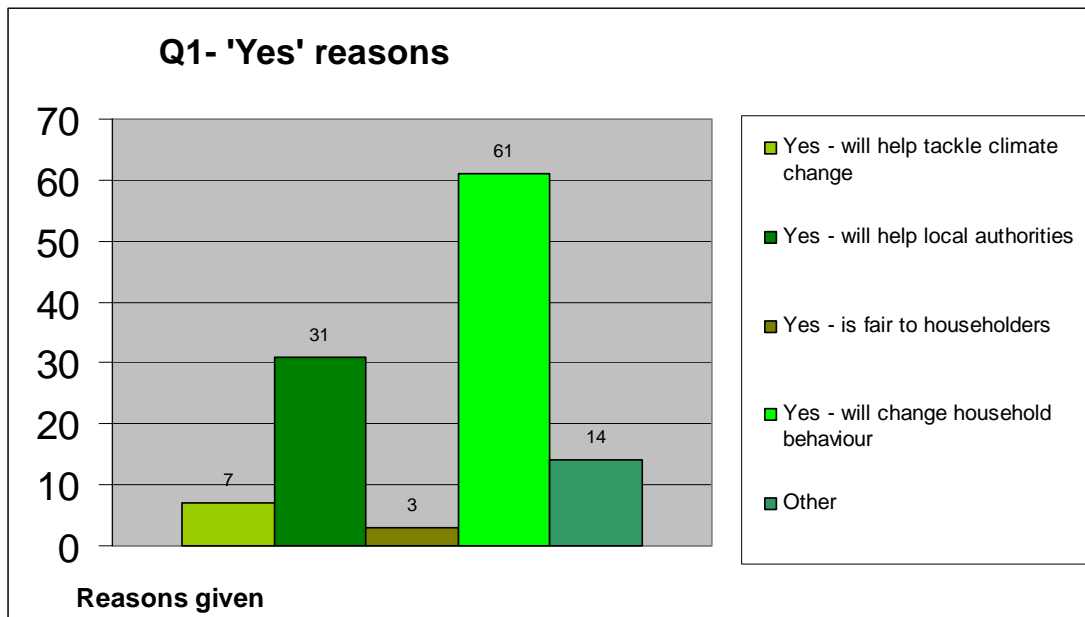
21. Friends of the Earth (FoE) agreed local authorities should have the powers to introduce financial incentives as such schemes have been shown to incentivise people to increase the amount of recycling and composting they do, and also seems to reduce the amount of waste produced.

22. The following chart summarises the conditions indicated by some respondents for agreeing that local authorities should have the power to introduce financial incentives:



23. A common theme among those giving “other” conditions was that local authorities should have full discretion regarding how they operate incentives schemes. One waste collection authority agreed that it would be important to have flexibility so that hard to reach areas, such as high rise flats, could be excluded and said schemes should also be subject to a neutral financial impact. “Other” suggestions also included a condition that these schemes should be based on offering incentives via reductions in Council Tax for reducing waste levels overall and increasing the proportion of waste to be recycled; that schemes should not replace central Government funding; that schemes should be accompanied by public awareness campaigns; and that in two-tier areas, there should be measures to avoid introduction of a scheme which the WDA judged to be unreasonable and to significantly disadvantage residents of other WCAs in its area.

24. The following two charts give respondents’ reasons for agreeing and not agreeing to local authorities being given the power to introduce financial incentives:

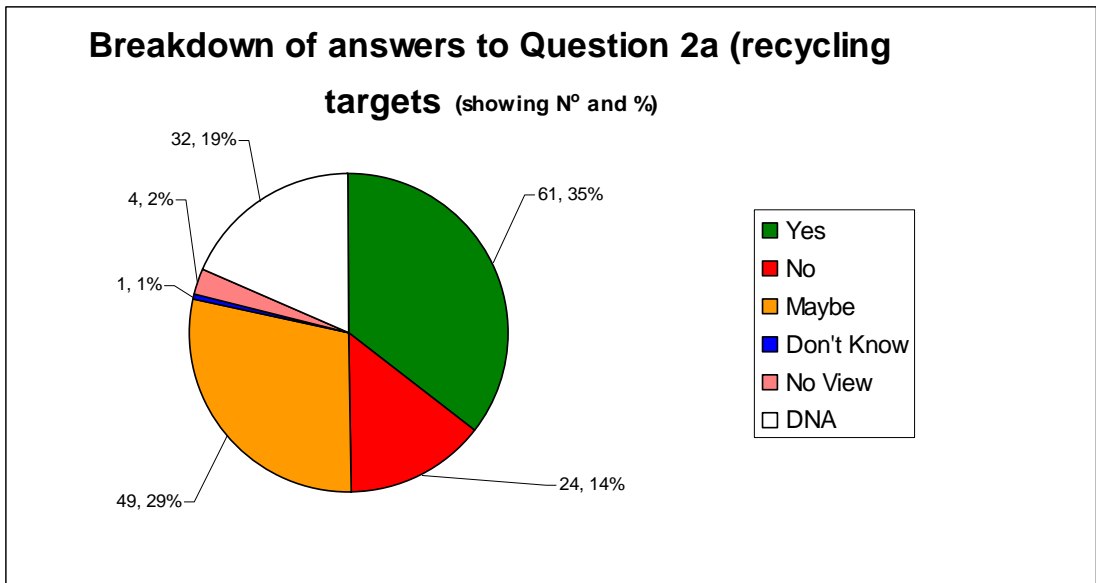


Note - The 'others' (14) in these tables is the same statistic in both tables, i.e. 'other' reasons for saying either "yes" or "no"

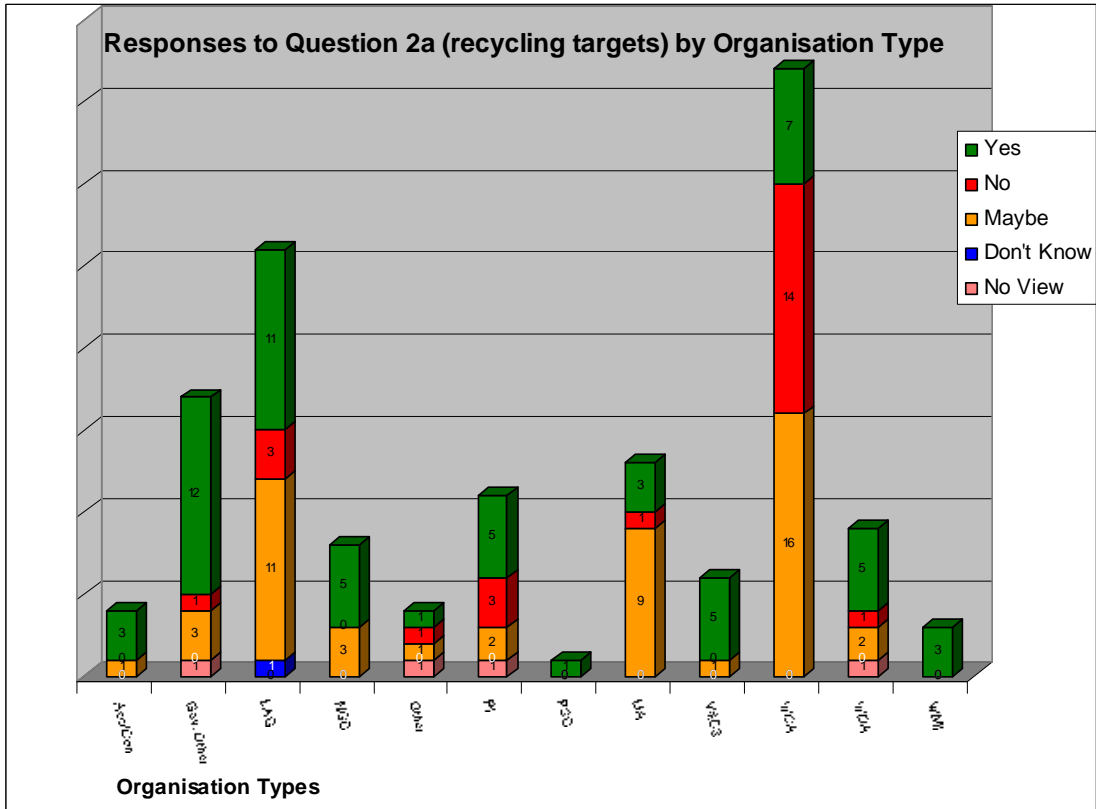
25. Often respondents gave more than one reason for agreeing or disagreeing. The most common reason (61 responses) for agreeing to the power for financial incentives was that such schemes would change behaviour. On the other hand there were those who felt that the indicative level of charges given in examples in the consultation document would not be sufficient to change behaviour.

26. As for "other" reasons for saying 'no', one suggestion was that a voluntary power will lead to a postcode lottery - it would only be applied in more affluent areas that are already recycling. It should be universally applied.

27. In answer to **Question 2a** on whether financial incentives would help local authorities meet their recycling targets, 61 of 139 respondents who answered this question (44%) thought they would help. A further 49 (35%) thought this may be the case while 24 (17%) said financial incentives wouldn't help. Others did not know or had no view.

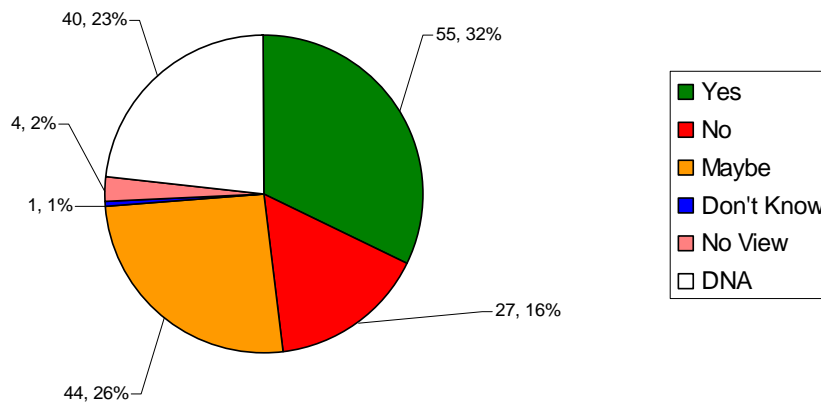


DNA = did not answer



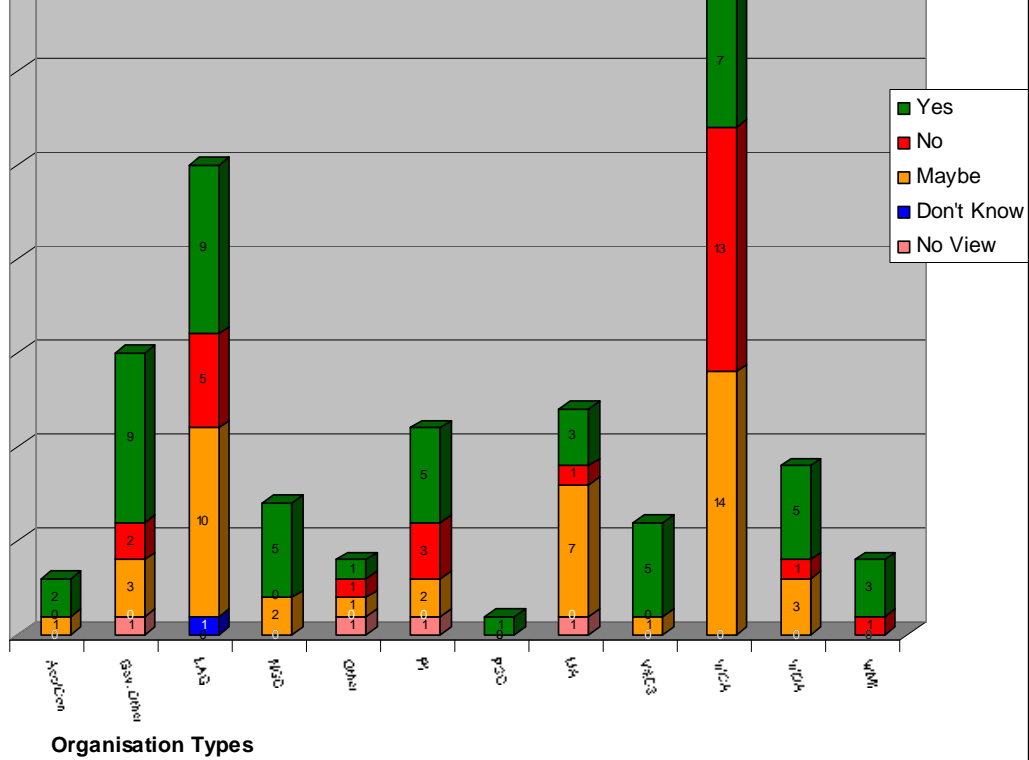
28. For **Question 2b** on whether financial incentives would help local authorities meet their obligations under the Landfill Allowance Trading Scheme (LATS), 55 of 131 respondents (42%) considered that they would help, whilst another 44 (34%) answered 'maybe' and 27 (21%) thought it wouldn't help. Others did not know or had no view.

### Breakdown of answers to Question 2a (LATS obligations) (showing N° and %)



DNA = did not answer

### Responses to Question 2a (LATS obligations) by Organisation Type



### Revenue neutrality

29. Government stated that it would require any financial incentive scheme to be revenue neutral. This means that local authorities would not be able to use a financial incentive scheme as a means of raising more money – all money collected under the scheme would have to be returned to residents. The proposals anticipate that the set up and running costs would be covered by savings resulting from less residual waste to dispose of.

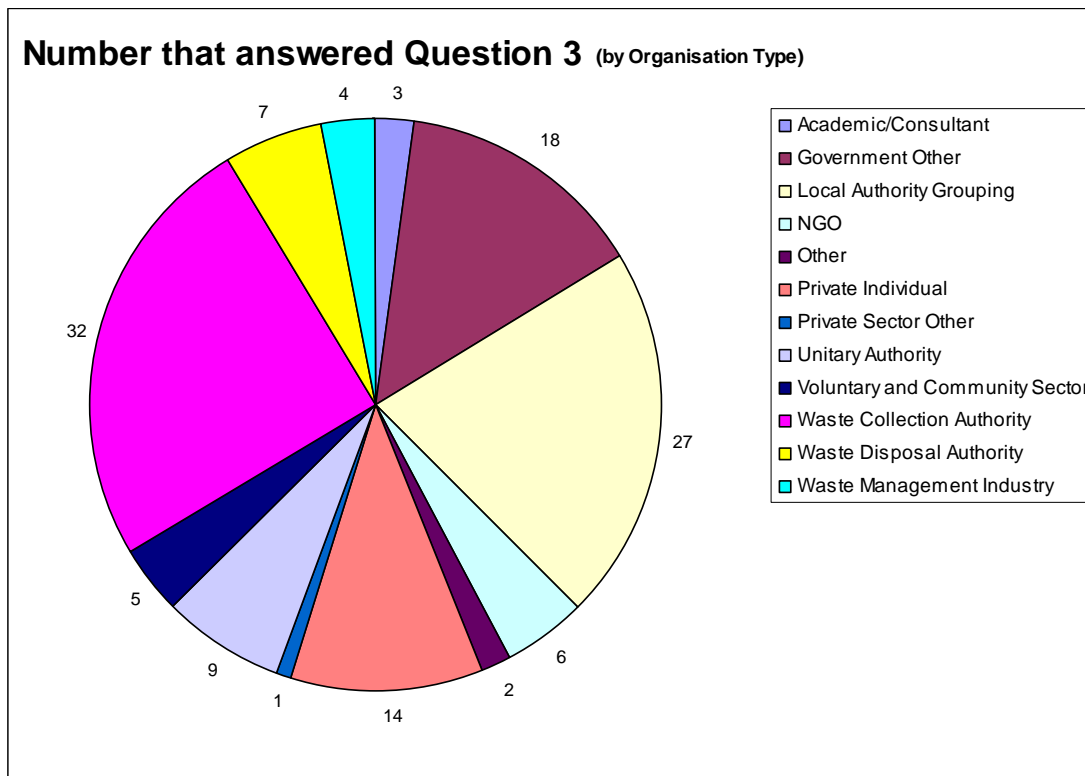
30. Consultees were asked the following questions:

**Do you agree with that a waste financial incentive with net neutral impact upon local residents (Option C) is the best of the three options outlined ?(Q3)**

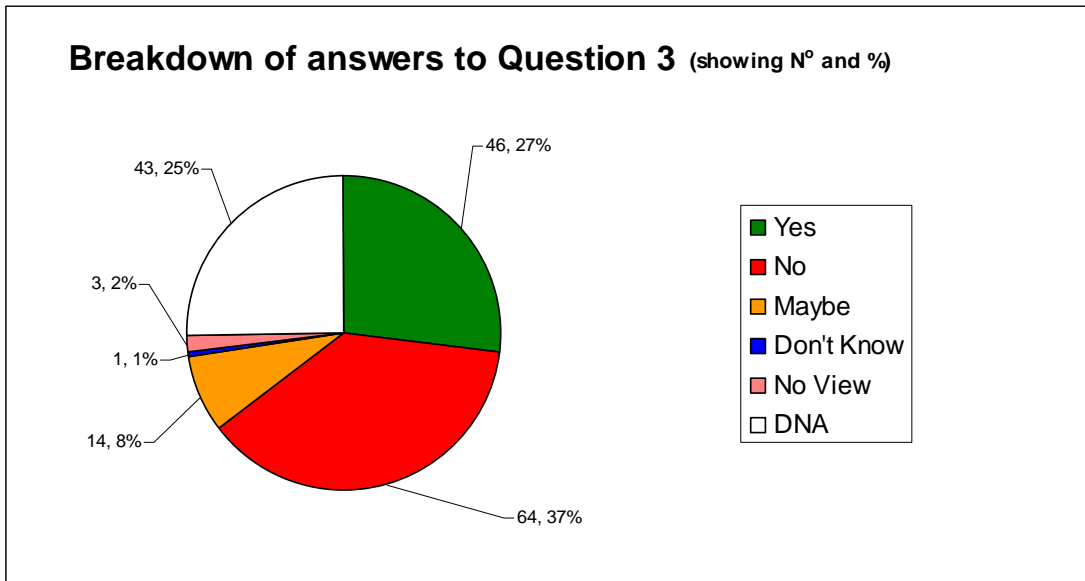
**Do you agree that any financial incentive scheme should be revenue neutral? (Q4a)**

**Do you agree with the Government’s definition of revenue neutrality? (Q4b)**

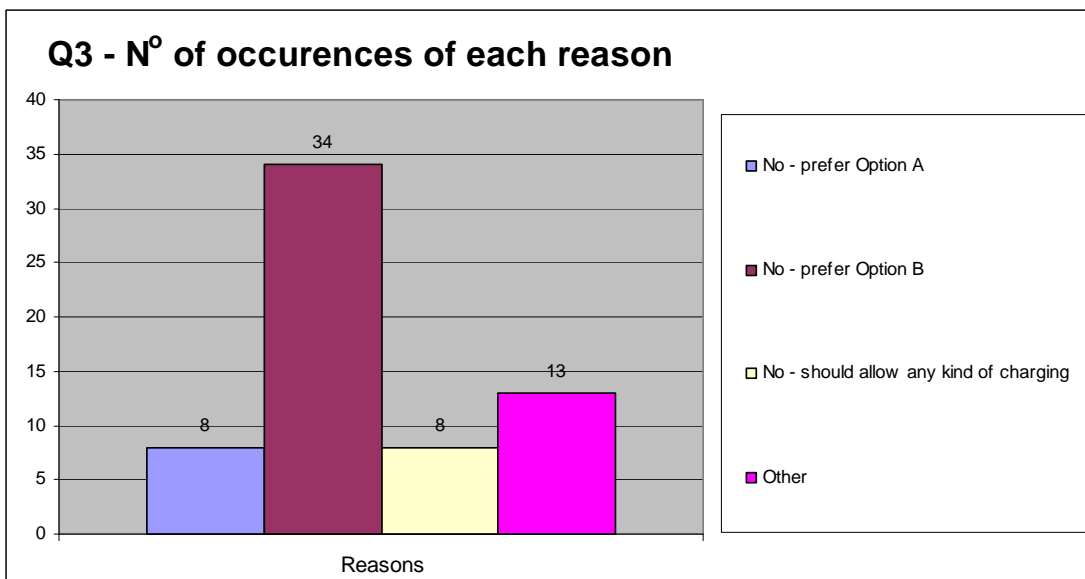
31. The chart below breaks down the number of respondents who answered **Question 3**:



32. As regards the three options outlined in Paragraph 5.2 of the consultation document (Question 3), 46 (36%) of the 128 respondents who answered this question agreed that a revenue-neutral financial incentives scheme (Option C) would be the best option, with a further 14 (11%) indicating it might be the best option. 64 (50%) did not agree.. Most categories of respondents, including waste collection authorities and waste disposal authorities were relatively evenly divided between those favouring Option C and those favouring Option B (a localised waste charge). It was “local authority groupings” who raised most concerns with Option C with six in favour and 19 against.



33. As for reasons given for saying Option C was not the best option, the majority (34 responses), did so because they preferred Option B, a localised waste charge. The following chart gives a breakdown the numbers of respondents that gave each reason:



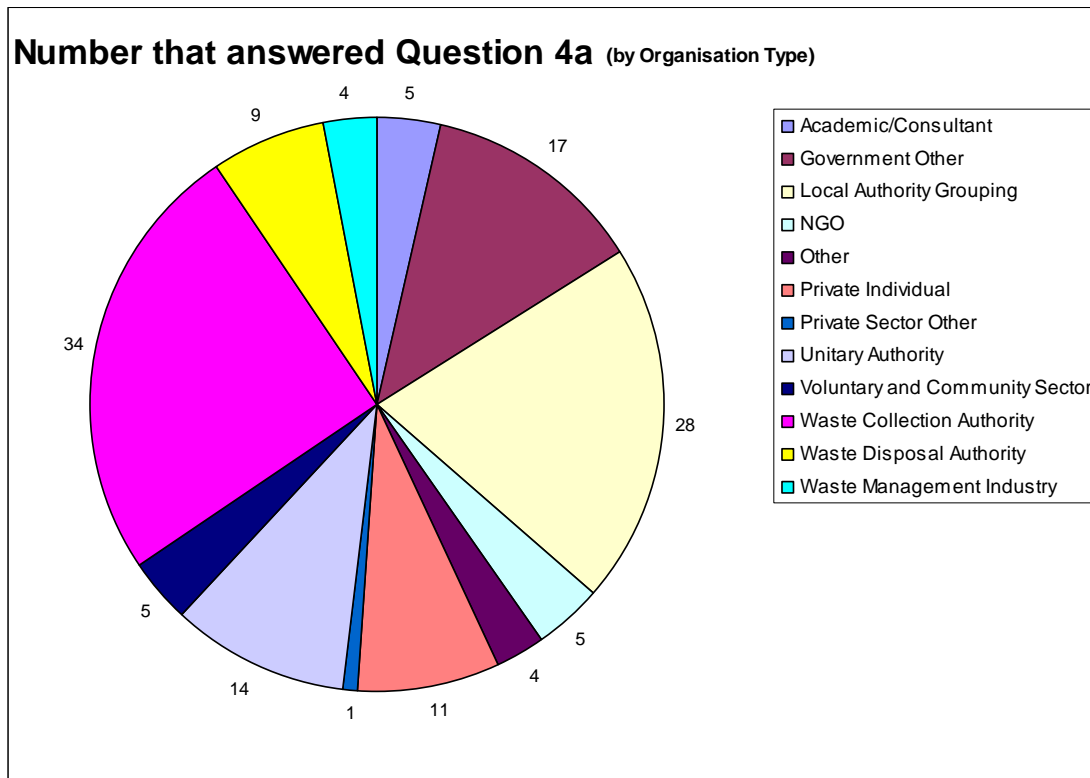
34. 14 out of the 19 local authority groupings who disagreed that Option C was the best option did so because they preferred Option B, as did ten out of 16 waste collection authorities who disagreed. (Only two waste disposal authorities said 'no', neither for this reason)

35. The LGA suggested that legislation should permit local authorities to introduce a scheme along the lines of Option C should they wish to. However they consider that the approach of Option C could be complex, and may be potentially difficult to administer and to explain to the public.

36. CIWM favoured Option B due to experience from overseas that shows charging for household waste has an impact on waste arisings and recycling, but could accept Option C. They suggested piloting options B and C to see which achieve the best recycling or minimisation of residual waste, or both..

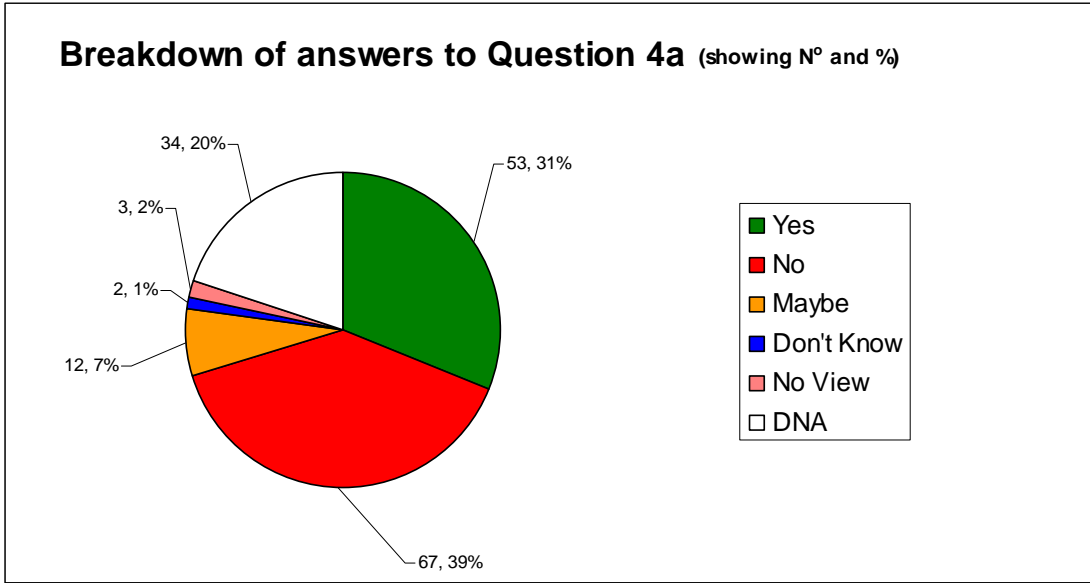
37. ESA had generally envisaged direct charging applied in a non-regressive manner as a means, through ‘polluter pays’ disciplines, of providing additional revenue for local authorities to deliver their waste management obligations.

38. FoE indicated support for an approach more in line with Option B. As many other countries have a system which is not revenue neutral, it should be possible in England, and they added the public is used to paying for utilities such as gas and electricity.

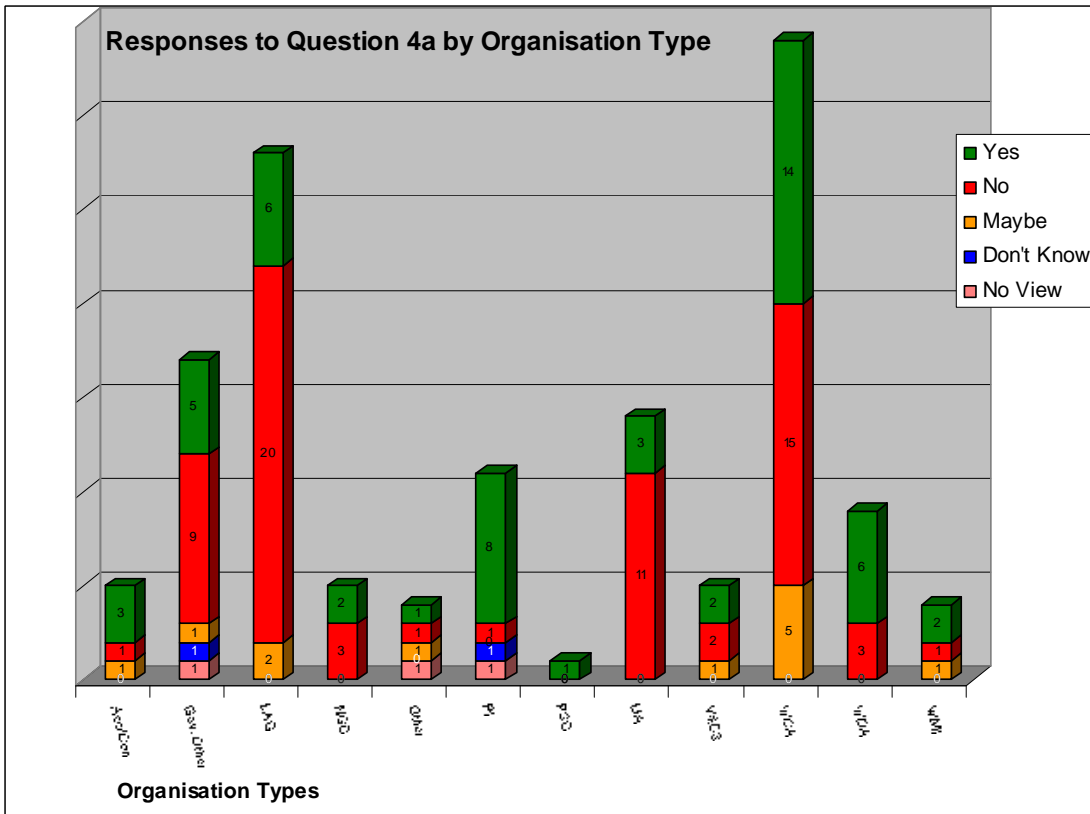


39. Of the 137 answers to **Question 4a** (see chart above for a breakdown of respondents) which asked whether respondents agreed that any financial incentives scheme should be revenue neutral, 53 (31%) agreed it should be revenue neutral with a further 12 (7%) indicating they feel that maybe schemes should be revenue neutral. 67 (39%) disagreed. There was more variation in views between types of respondent to this question. For example, 14 waste collection authorities agreed and 15 did not, while waste disposal authorities were split six to three in favour. Three Unitary authorities were for revenue neutrality and 11 against, and local authority groupings were 6 to 20 against. The group who were most clearly in favour were private individuals with eight for and one against.

40. A breakdown of respondents’ answers on whether financial incentives schemes should be revenue neutral is shown below:

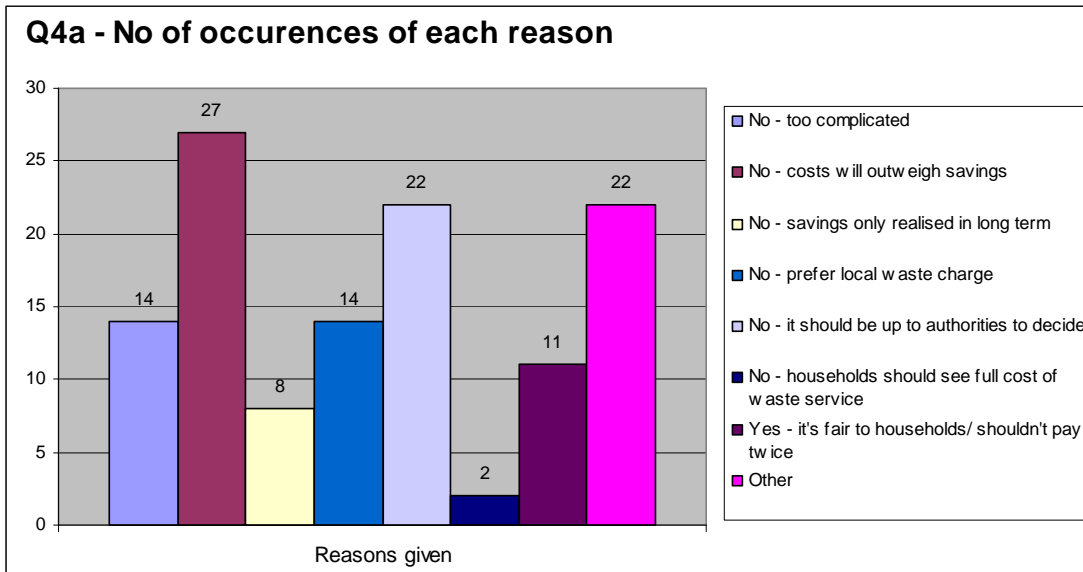


DNA = did not answer

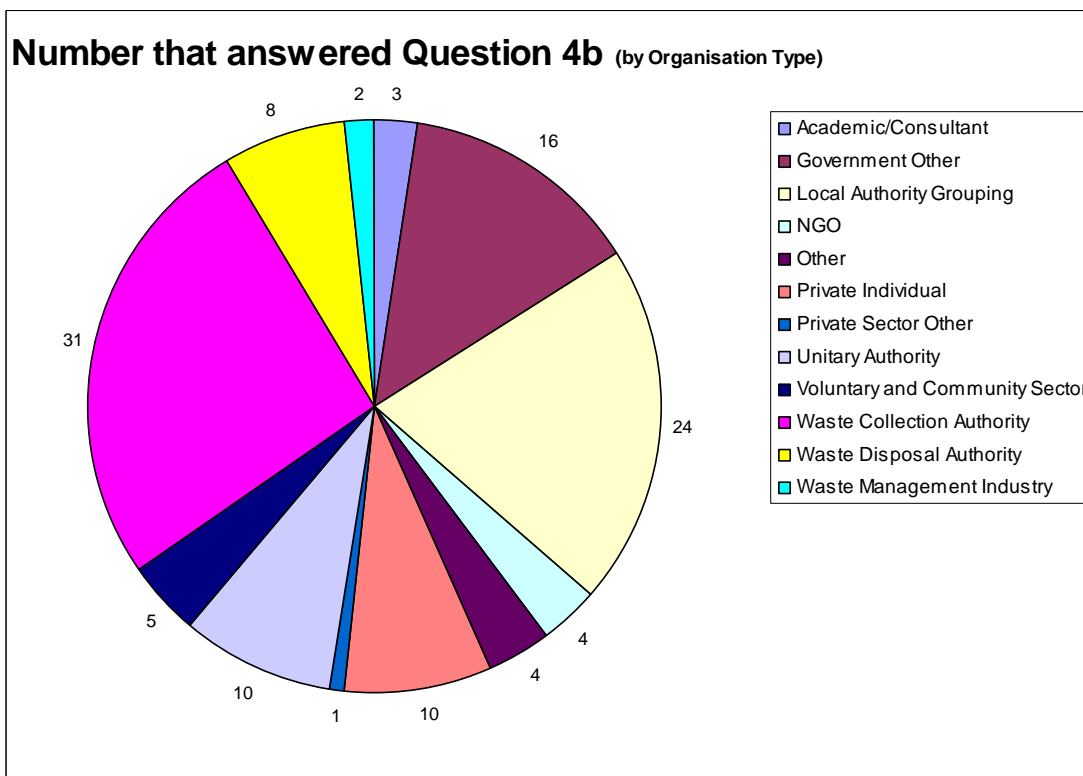


41. 90 respondents gave a reason for their response to this question. Of those answering 'no', this was most often because of concerns that savings may not be sufficient to cover costs, at least in the short term (30 responses) or that it should be a matter for local authorities to decide whether or not to charge (22 responses). Some respondents also thought that schemes would be too complicated (14 responses) or that a charge (whereby revenue could be raised by local authorities) would be better (14 responses). However, other respondents thought the proposed system would be fair, since households wouldn't be paying twice (11 responses).

42. The following chart gives the reasons some respondents preferred or did not prefer financial incentives schemes to be revenue neutral:

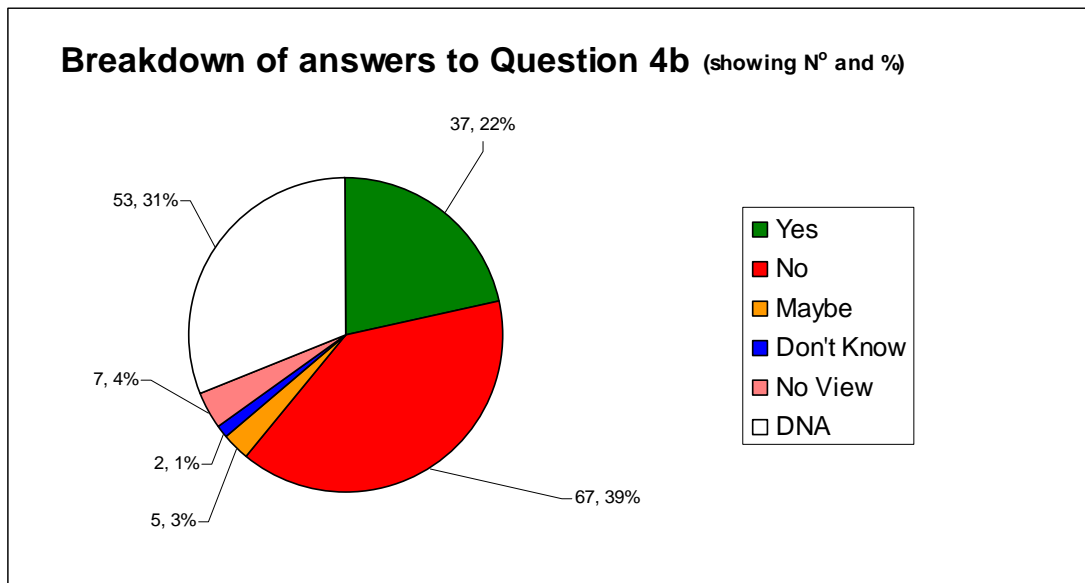


43. The chart below details the types of respondents who answered **Question 4b** which asked whether they agreed with the Government's definition of revenue neutrality.

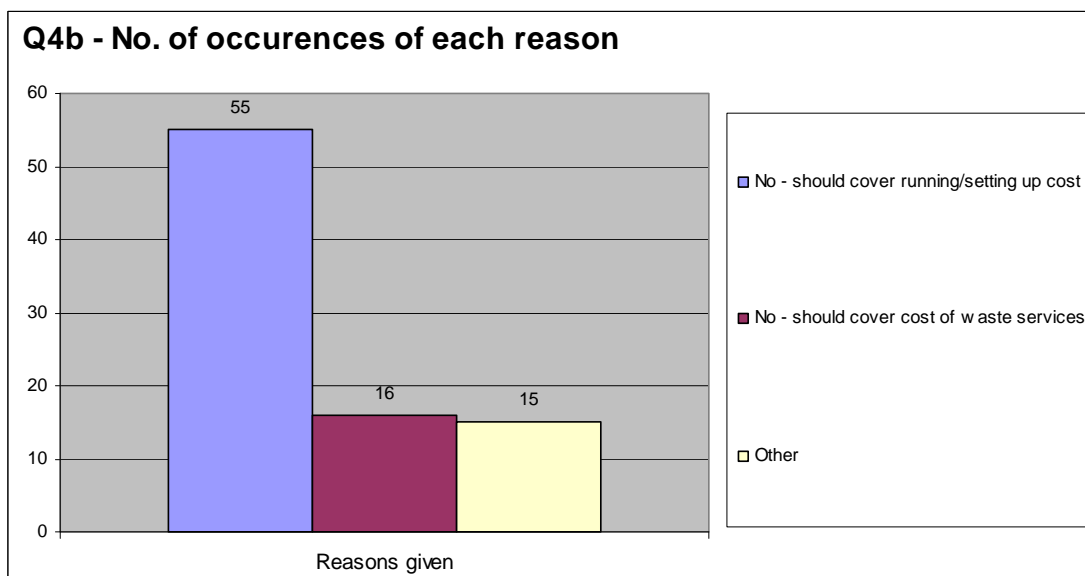


44. 118 respondents answered this question. Of these, 37 (31%) agreed with the definition, with a further five (4%) saying 'maybe', whilst 67 (57%) disagreed. Others did not know or had no view.

45. The charts below show how respondents answered and the reasons given by those who said 'no'. They did not agree with the Government's definition:



DNA = did not answer



46. Many felt that the definition should include costs of both setting up and running schemes. The most common reason (55 responses) respondents gave for not agreeing with the Government's definition was that they felt some of the monies raised should be available to cover set up and running costs. Some also thought that schemes should be able to cover the total cost of the waste service (16 responses). FoE suggested that if an authority has to pay for the running of the scheme from outside the revenue raised by the scheme, this may be an additional discouragement to implement financial incentives schemes.

47. Some respondents pointed out that setting up and running costs would be more immediate while savings through waste minimisation would only be realised in the longer term. Again, local authority groupings were the category of respondent most against with 19 saying they didn't agree with the definition, with only four agreeing. Ten waste collection authorities agreed with the definition while 19 did not. Three waste disposal authorities agreed while five did not, while for unitaries, the figures respectively were one and five.

48. ESA had envisaged direct charging as a means of helping local authorities to invest in the infrastructure needed on which basis 'cost reflectivity' might be a preferred option for capping funds raised through direct charging. But given the parameters of the Government's proposal, they feel the definition seems appropriate..

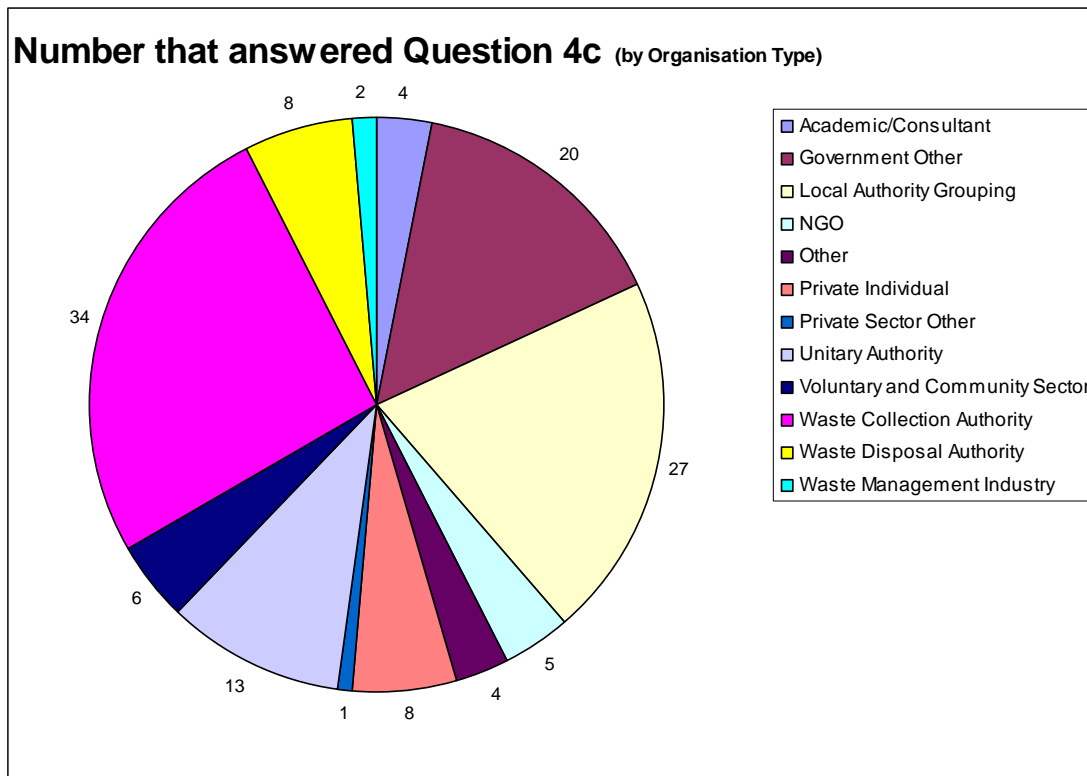
49. Some respondents thought that waste disposal authorities may experience no reduction in costs, or even increases in costs, as their landfill savings are offset by additional recycling credits payable to waste collection authorities. Others said waste collection authorities may face increased costs through there being not so much waste to recycle and earn recycling credits if residents are encouraged to minimize waste.

50. Of the 53 respondents who agreed that any financial incentive scheme should be revenue neutral, 17 (32%) of those did not however agree with the Government's definition of revenue neutrality, again mainly because they felt it should include set-up and running costs, as explained above.

### Local authority discretion over level of incentive

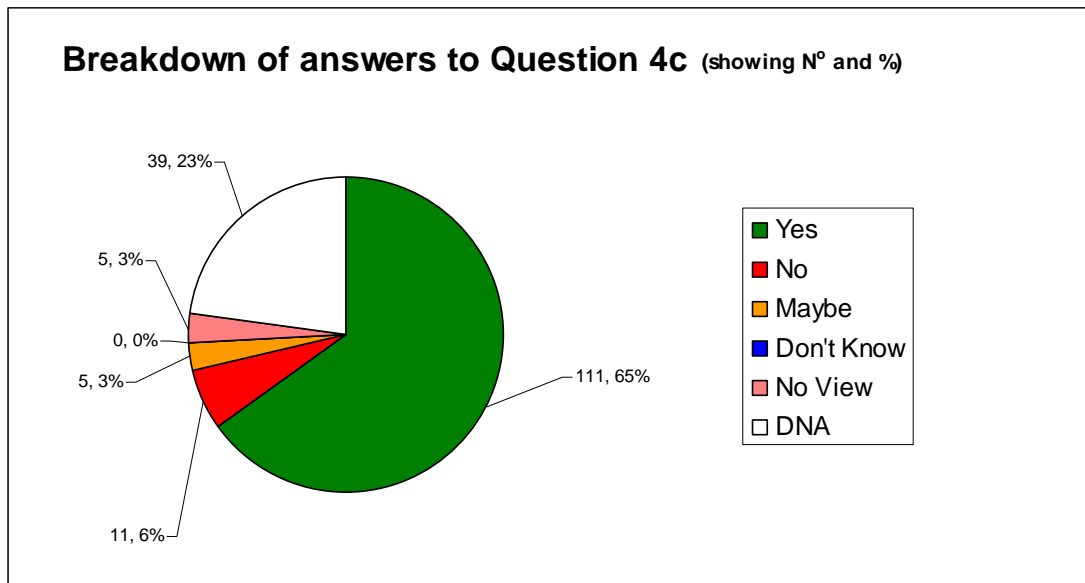
#### Do you agree that local authorities should be free to determine the level of charges under a financial incentive scheme? (Q4c)

51. There were 132 answers to this question, and the following chart breaks these down by type of organisation:



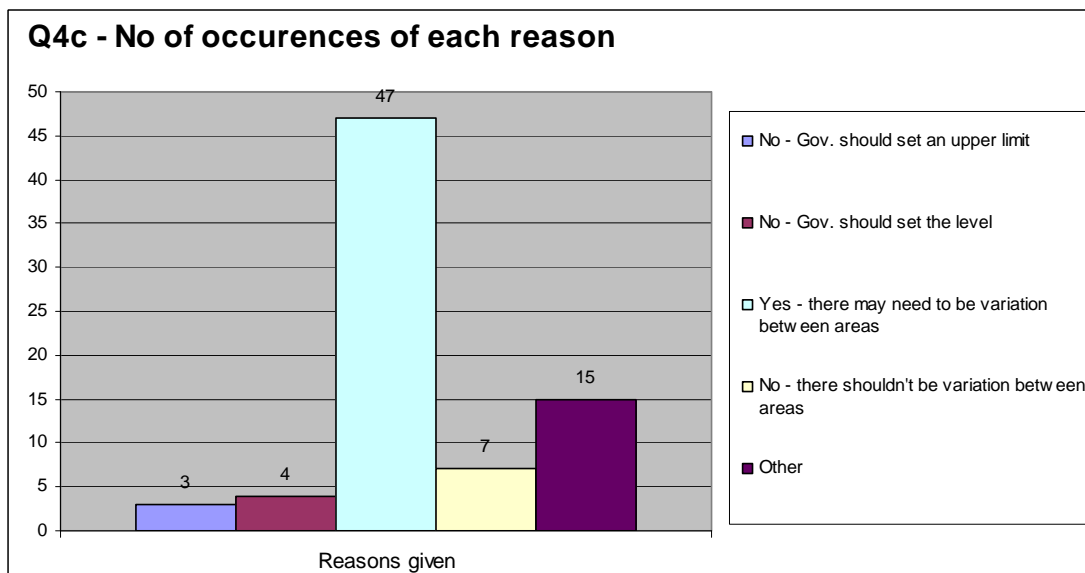
52. Respondents who answered this question were strongly in favour - 111 (84%) in favour and 11 (8.5%) against - of local authorities being free to determine the level of charges. All categories of respondent shared this view, except private individuals who were evenly split three each way. Five (4%) were undecided (a further five had no view).

53. The chart below is a breakdown of the response to this question:



DNA = did not answer

54. The most popular reason given (47 responses) by respondents who agreed was that charges should be able to vary to reflect different local needs and circumstances. There was no common reason emerging from the responses of those who said they did not agree. However, a few (seven) thought there should be a uniform approach across the country while a few others thought Government should set the level, or at least an upper limit. The following chart summarises reasons for answers.



55. Some respondents felt that the level of charges and rebates would need to be high enough to incentivise behaviour change, and that the illustrative figures (£30-£50 for weight-based schemes) in the consultation document may be too low in some areas.<sup>3</sup> Some, such as FoE, said authorities would need to consult local residents properly.

## Recycling collection service

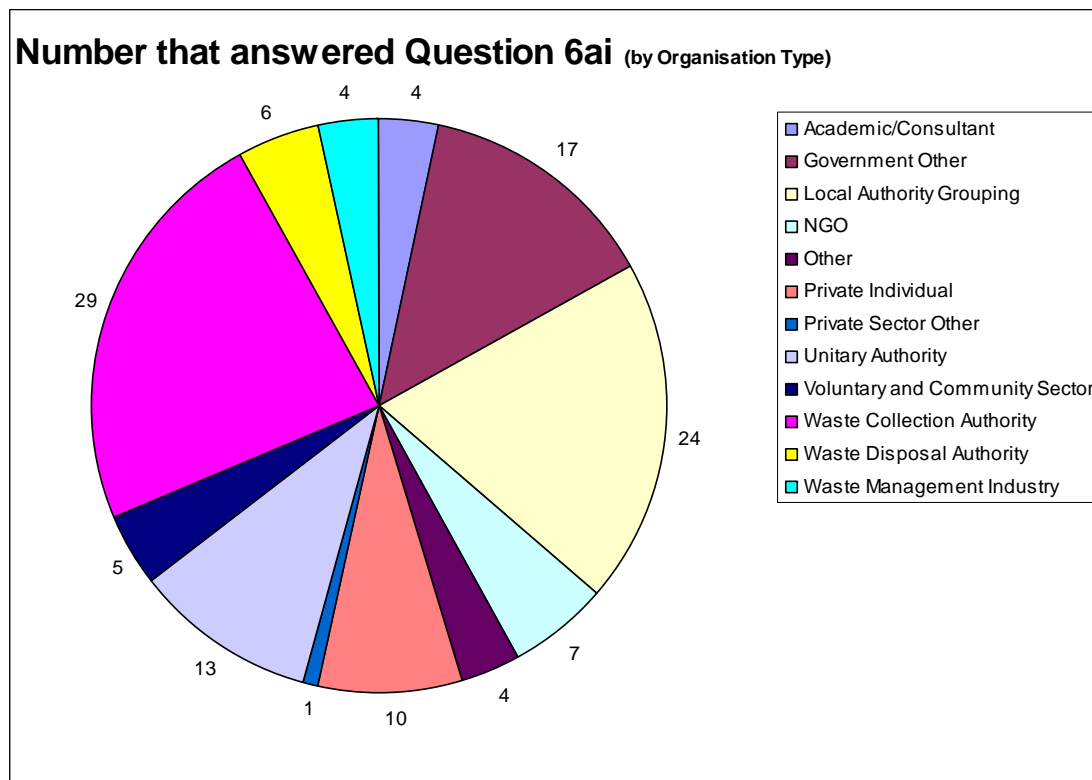
<sup>3</sup> These amounts are only an example. Ultimately it would be up to individual local authorities to decide the appropriate amount to charge in their areas.

56. In the consultation paper Government stated that it would be essential for local authorities to have good recycling services in place before introducing financial incentive schemes. The consultation proposed the requirement to provide kerbside recycling facilities for at least five waste streams (not including garden waste).

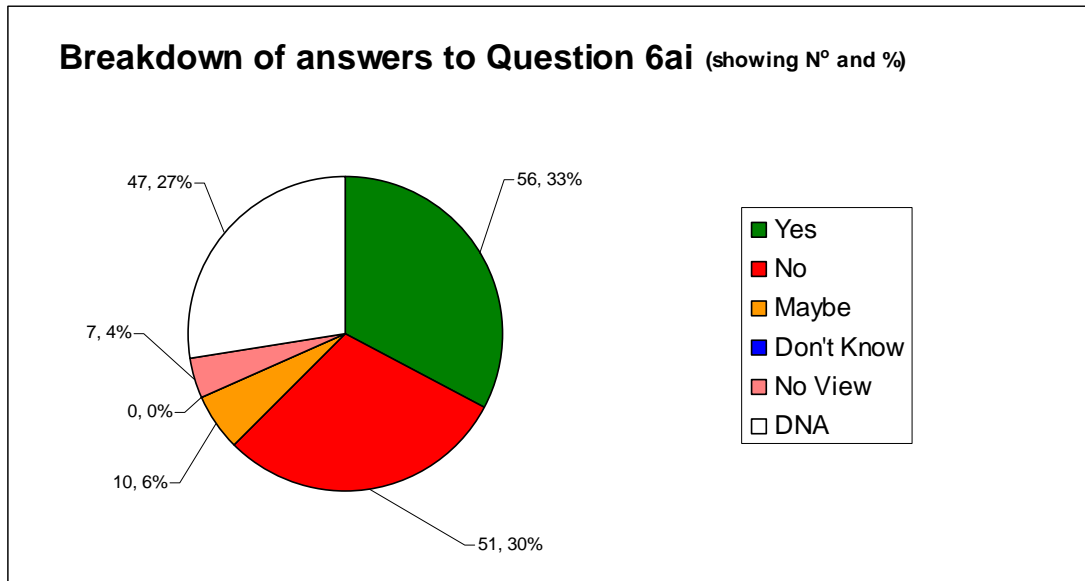
57. Consultees were asked the following question:

**If the Government were to allow financial incentives, what requirement should the Government place on local authorities as regards existing recycling services – do you agree with the proposal to require authorities to offer a recycling/composting service for at least 5 waste streams to any household covered by a financial incentives scheme? (Q6ai)**

58. 124 respondents addressed this question:



59. 56 (45%) of respondents who answered this question agreed that local authorities should be required to provide a recycling/composting service for at least five waste streams to households covered by a financial incentives scheme, while 51 (41%) disagreed.

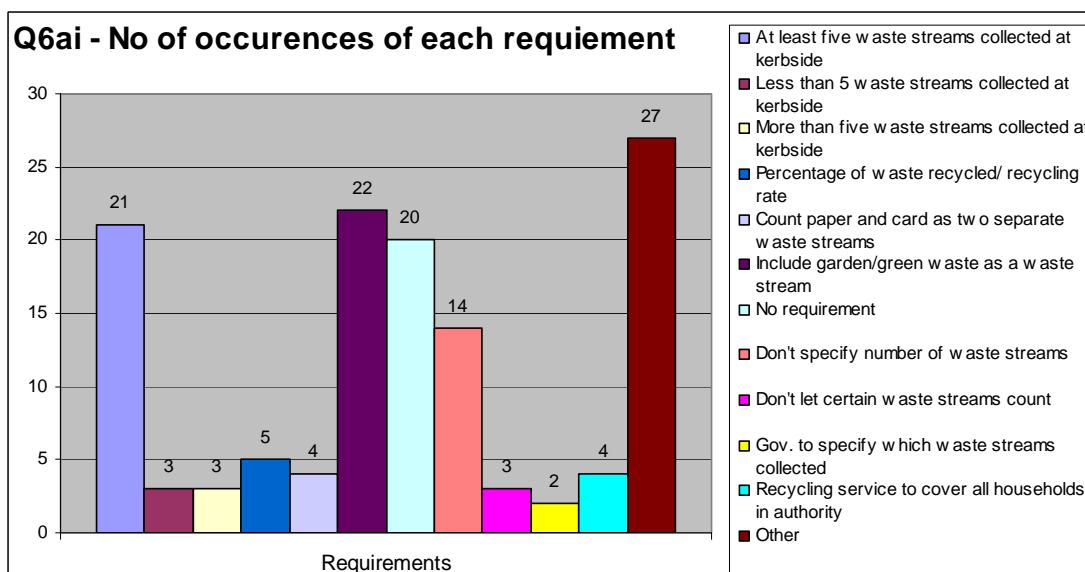


DNA = did not answer. This group is not included in Paragraph 63.

60. 15 respondents from local authority groupings were against this requirement while only five were in favour, and unitaries were eight against and four in favour. The figures for waste collection and disposal authorities were respectively 17 in favour, ten against, and four in favour and two against.

61. There was general agreement that that a good recycling service would need to be provided in areas where an incentive scheme is implemented. However, 20 respondents thought the Government should not impose any requirements on local authorities regarding the nature of the recycling service offered to households on a scheme and a further 14 respondents said that at least that Government should not specify the number of waste streams. A few (five responses) preferred local authorities to be required to recycle a certain *percentage* of household waste before introducing a scheme

62. This chart gives the numbers opting for each requirement:



63. FoE agree that at least five waste streams should be recycled (including food waste). Meanwhile, the LGA felt there should be no additional prerequisites placed on local government in addition to the duty placed by the Household Waste Recycling Act 2003 to collect at the kerbside at least two

materials for recycling (by 2010), as it would be impossible to define a single set of conditions which would be appropriate for all local authorities. They agreed, though, that offering an excellent range of recycling options councils would help gain support of their public.

64. 83 respondents said the Government should place at least some requirement on local authorities regarding the recycling service they provide to households covered by a financial incentives scheme.

65. Three respondents wanted the requirement to be for more than five waste streams be collected at the kerbside, while a further three respondents wanted less than five waste streams. Four wanted paper and card to be treated as two separate waste streams, and six wanted them counted as a single waste stream. 22 respondents felt garden waste should be counted as a waste stream.

66. CIWM felt that including a specific five waste stream requirement would disadvantage those authorities that have decided to use waste from energy as an option.

67. ESA saw merit in more standardisation over time but currently incline to the view that local authorities should be free to decide what they can best do locally.

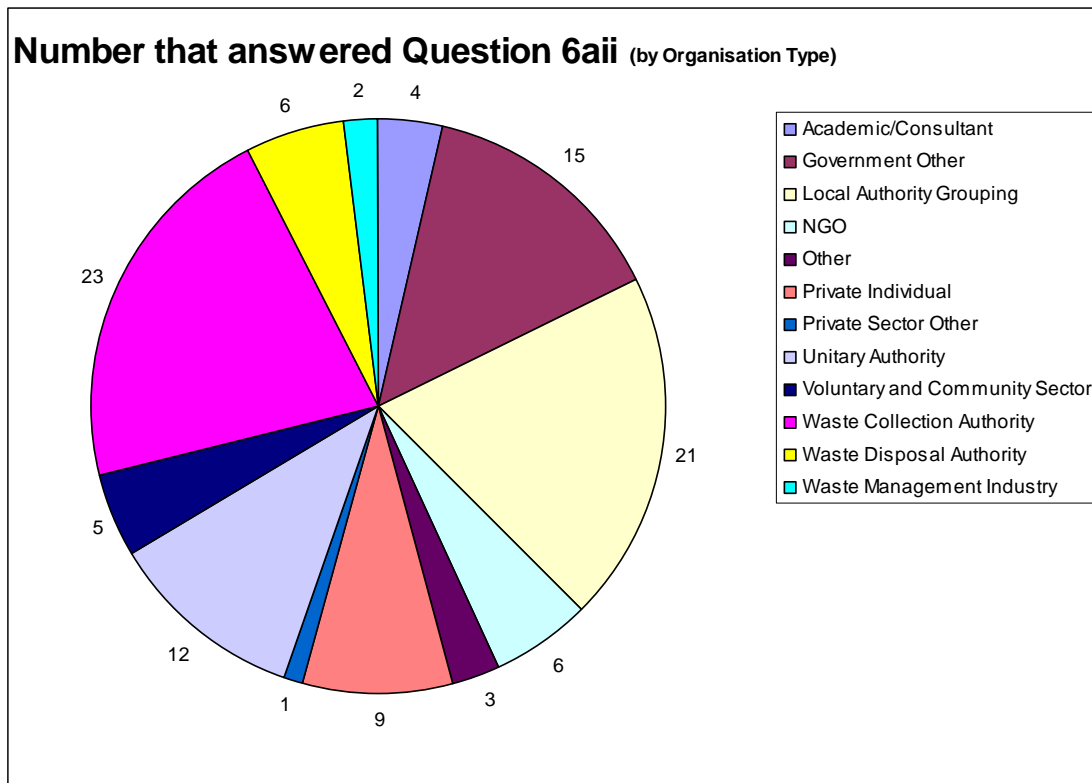
### **Illegal waste activity**

68. In the consultation paper Government stated that it would be essential for local authorities to have fly-tipping prevention and enforcement strategies in place before introducing financial incentive schemes.

69. Consultees were asked the following question:

**If the Government were to allow financial incentives, what requirement should the Government place on local authorities as regards waste crime strategies? (Q6a<sup>ii</sup>)**

70. The following chart shows a breakdown of categories of respondents who answered this question:



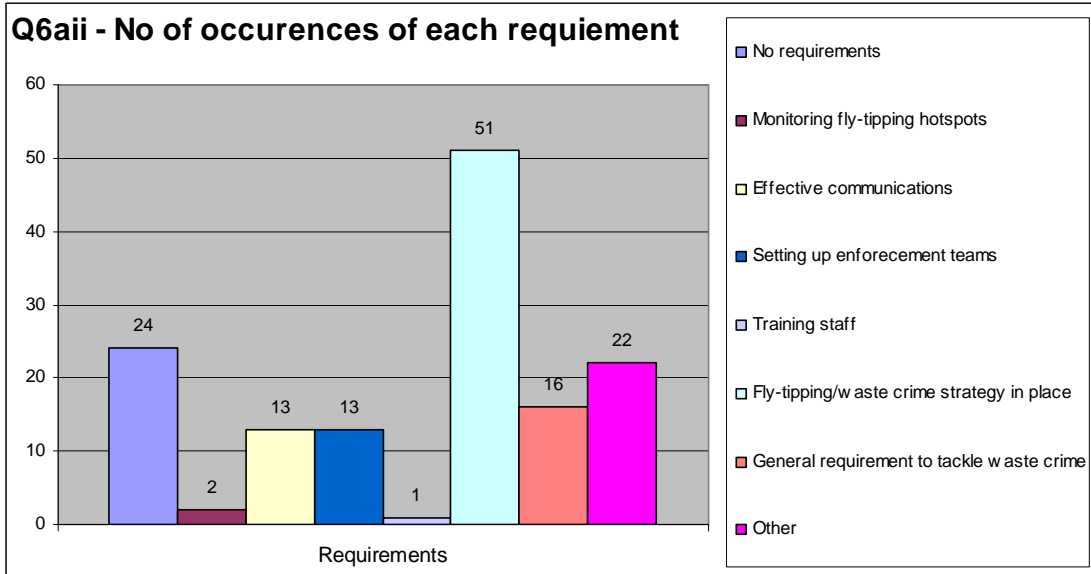
71. 107 respondents answered this question of whom 83 said the Government should place at least some condition on local authorities regarding waste crime strategies.

72. 51 said local authorities should have in place a fly-tipping prevention strategy, while a further 16 wanted a general requirement to tackle waste crime. A significant minority, 24, said that the Government should not impose any requirements as regards waste crime strategies.

73. 13 respondents felt effective communications with residents should be a condition and 13 wanted the setting up of enforcement teams to be a condition. Only two and one respondents respectively wanted the monitoring of fly-tipping hotspots and staff training to be conditions.

74. The LGA recognised that the importance of developing waste crime strategies should not be understated. FoE suggested that feedback from local residents should be used as one method of determining the success of waste crime strategies. ESA believes that it was imperative that the risk/reward ratio of committing environmental crime in the UK needs to be reversed

75. Answers to the question about requirements as regards waste crime are summarised in this chart:

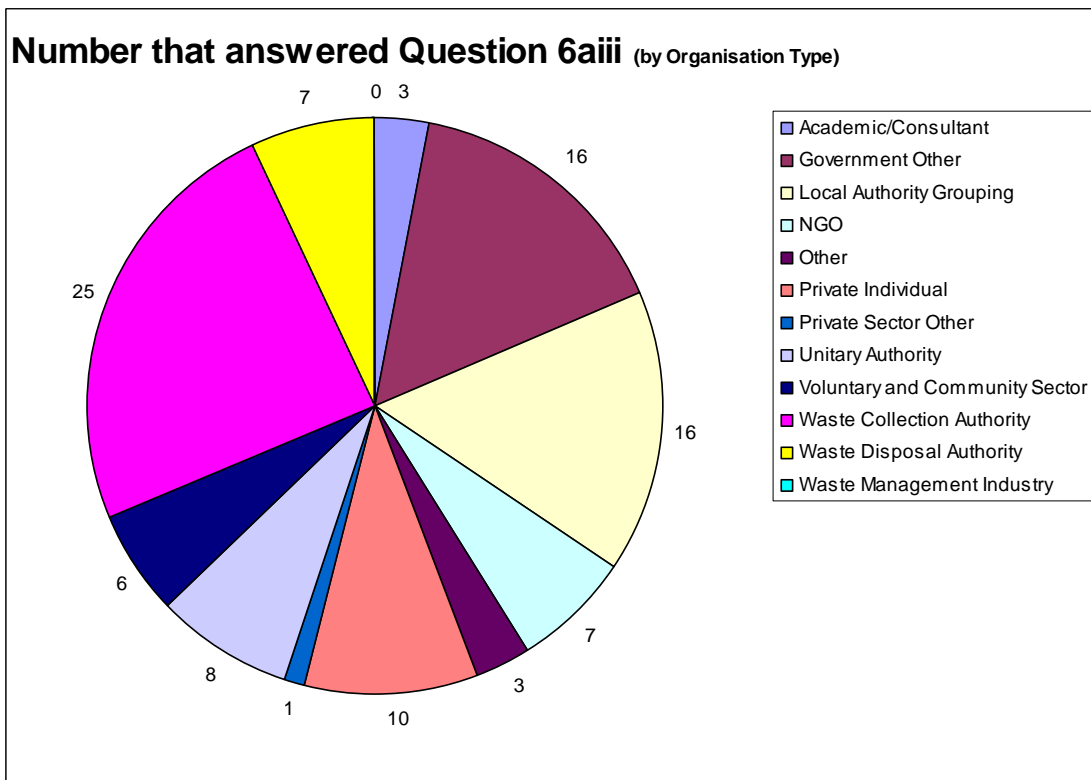


### Disadvantaged groups

76. In the consultation paper Government stated that it would be essential for local authorities to ensure schemes made provision for the needs of particular groups that could potentially be disadvantaged.

77. Consultees were asked the following question:

**If the Government were to allow financial incentives, what requirement should the Government place on local authorities as regards disadvantaged groups? (Q6aiii)**



0 = waste management industry

78. Of the 102 respondents who answered this question, 80 said the Government should place at least some requirement on local authorities regarding disadvantaged groups.

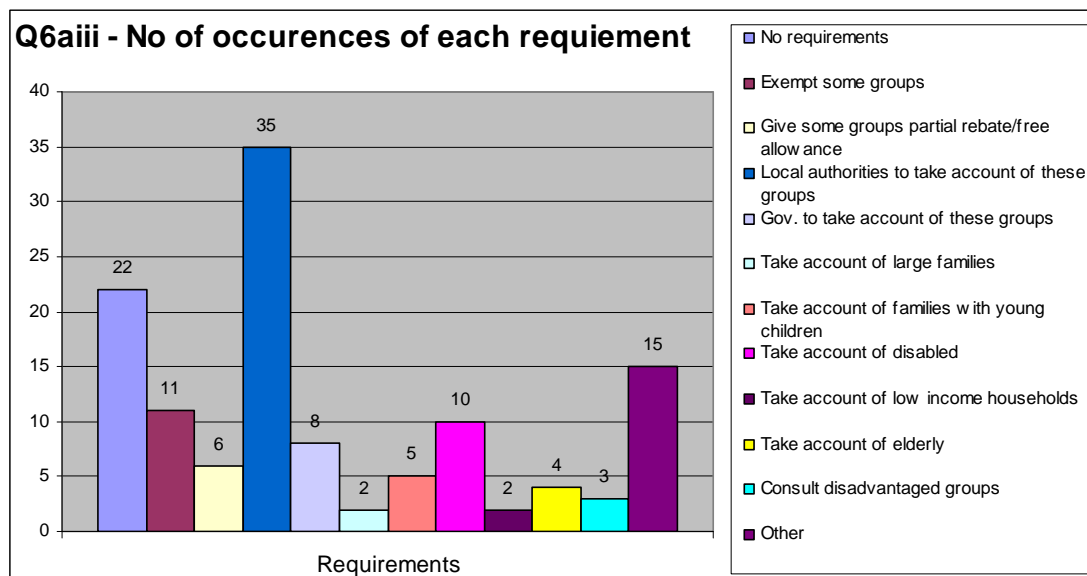
79. A significant proportion of respondents (43 responses) thought that either central (eight responses) or local Government (35 responses) should take account of these groups in some way. However, a meaningful number of respondents (22 responses) said there should be no requirement on local authorities as regards disadvantaged groups. Six respondents said some groups should be given a partial rebate or free allowance.

80. As for which particular groups to consider, the consultation gave some examples of potentially disadvantaged groups. Respondents showed no particular preference for any particular group in great numbers, but the disabled had the highest numbers of respondents (ten responses) saying they should be taken account of.

81. A significant minority argued that families with young children should not be given rebates or exemptions on the basis of nappy waste, since Government should be encouraging these households to move towards reusable nappies.

82. CIWM felt the ability of householders receiving council tax benefit to pay would not be compromised if the scheme was revenue neutral (as suggested). They suggested that, for this policy, the definition of “disadvantaged groups” could cover households with more than three occupants or families with small children.

83. This chart gives breakdown of answers regarding requirements for disadvantaged groups:



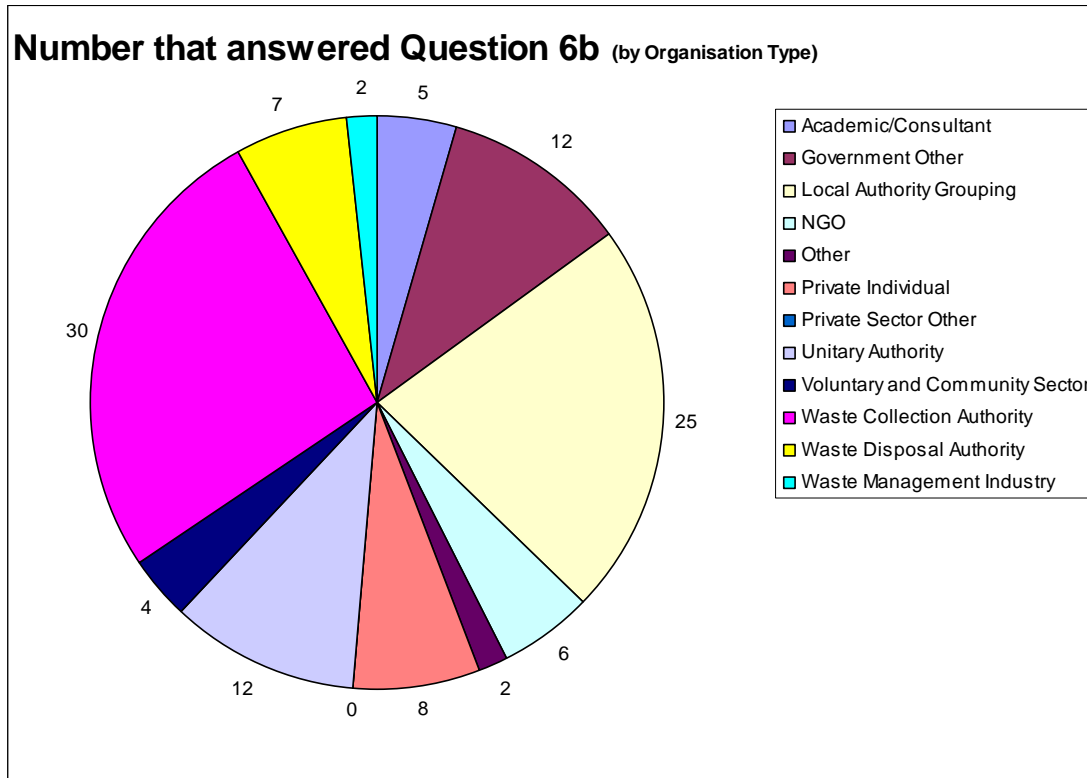
### Determining issues at Government or local level?

84. Consultees were asked the following question:

**[Relating to requirements Government should place on local authorities as regards: existing recycling services; waste crime**

**strategies; and disadvantaged groups] How far should these issues be determined by the Government, and how far at local level? (Q6b)**

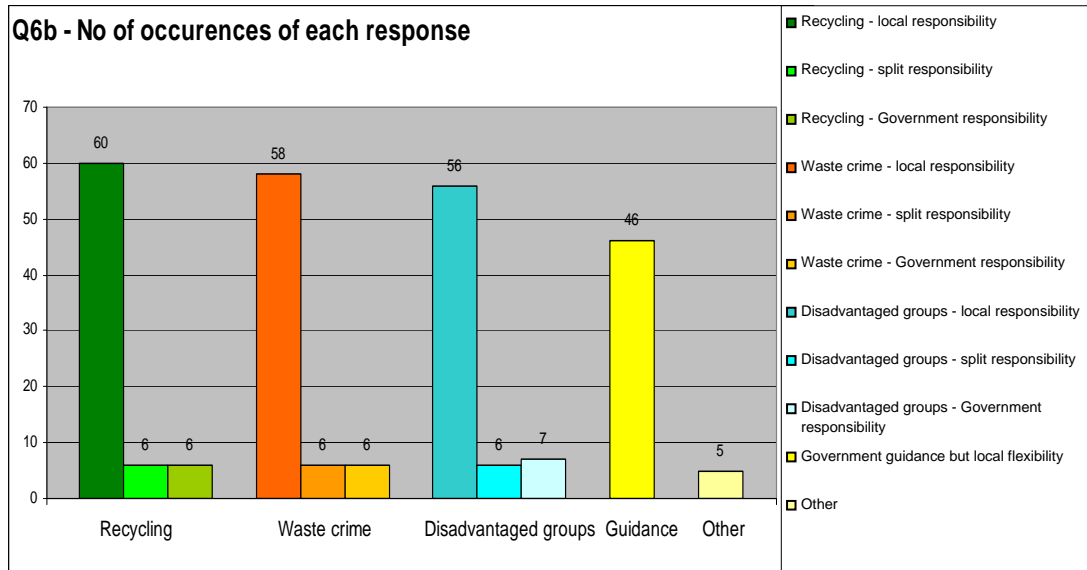
85. 113 respondents answered this question, and a breakdown of those who responded is shown in the chart below:



86. The majority felt that these issues should be determined all or mostly at local level, and this was the preference within each type of respondent category.

87. 60 respondents felt that this should be the case for the recycling service, with only twelve saying responsibility should reside with central Government or should be evenly split between central and local government. Meanwhile, 58 said issues around waste crime should be determined locally with twelve again expressing a different view. For the issue of disadvantaged groups, 56 felt this was a matter for local decision, with 13 disagreeing. A further 46 responses expressed the view that these issues ought to be subject to guiding principles from central Government, but leaving room for local flexibility.

88. FoE said the Government should set clear parameters that must be met by local government. The following chart summarises the number of occurrences of each view:



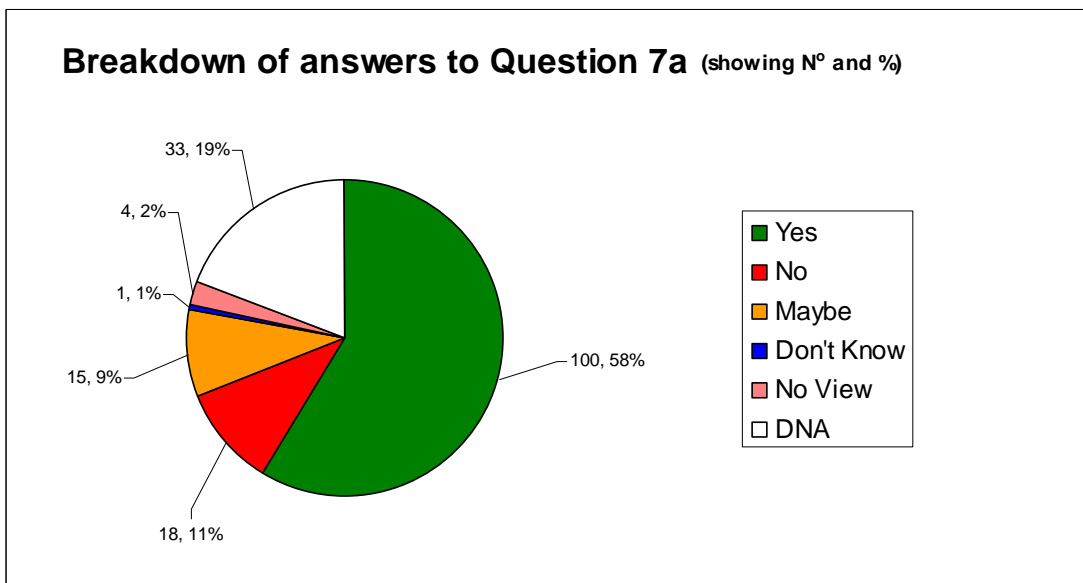
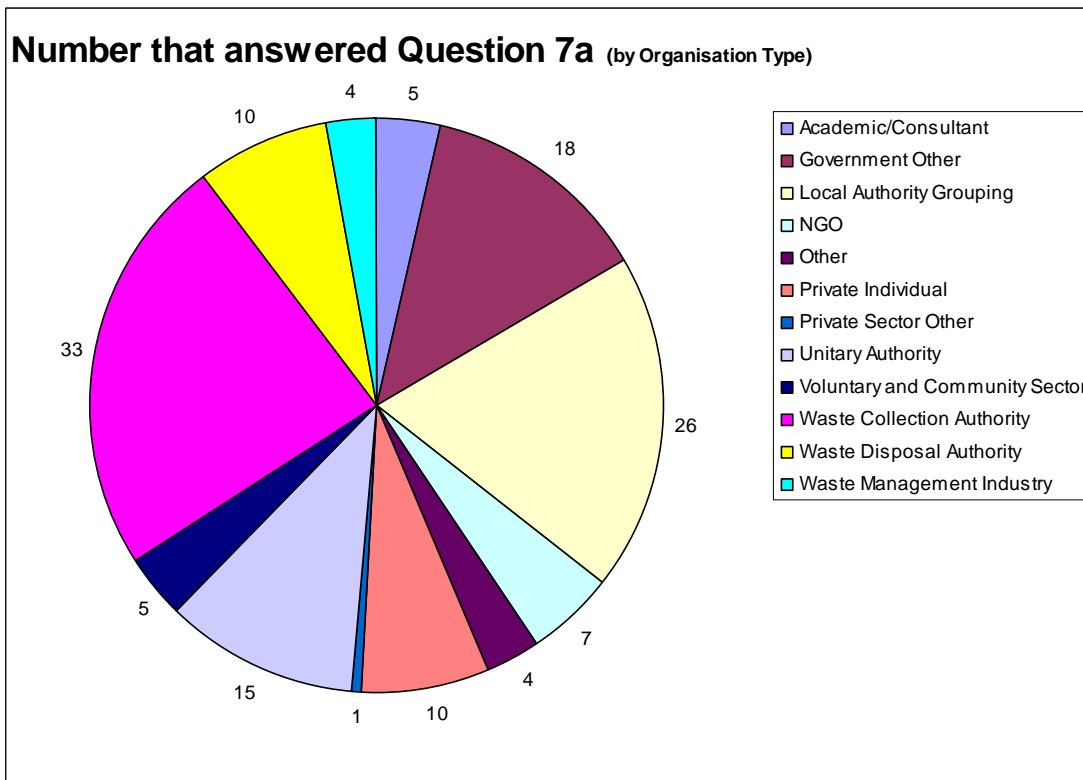
### Civic amenity sites

89. Consultees were asked the following questions:

**Do you agree that waste disposal authorities should have the power to implement financial incentive schemes at civic amenity sites? (Q7a)**

**If so, how could financial incentives be administered at civic amenity sites? (Q7b)**

90. Of the 138 respondents who answered **Question 7a**, 100 (72.5%) agreed that waste disposal authorities should have the power to implement financial incentives at civic amenity (CA) sites, with 18 disagreeing. The response is summarised in the following charts:



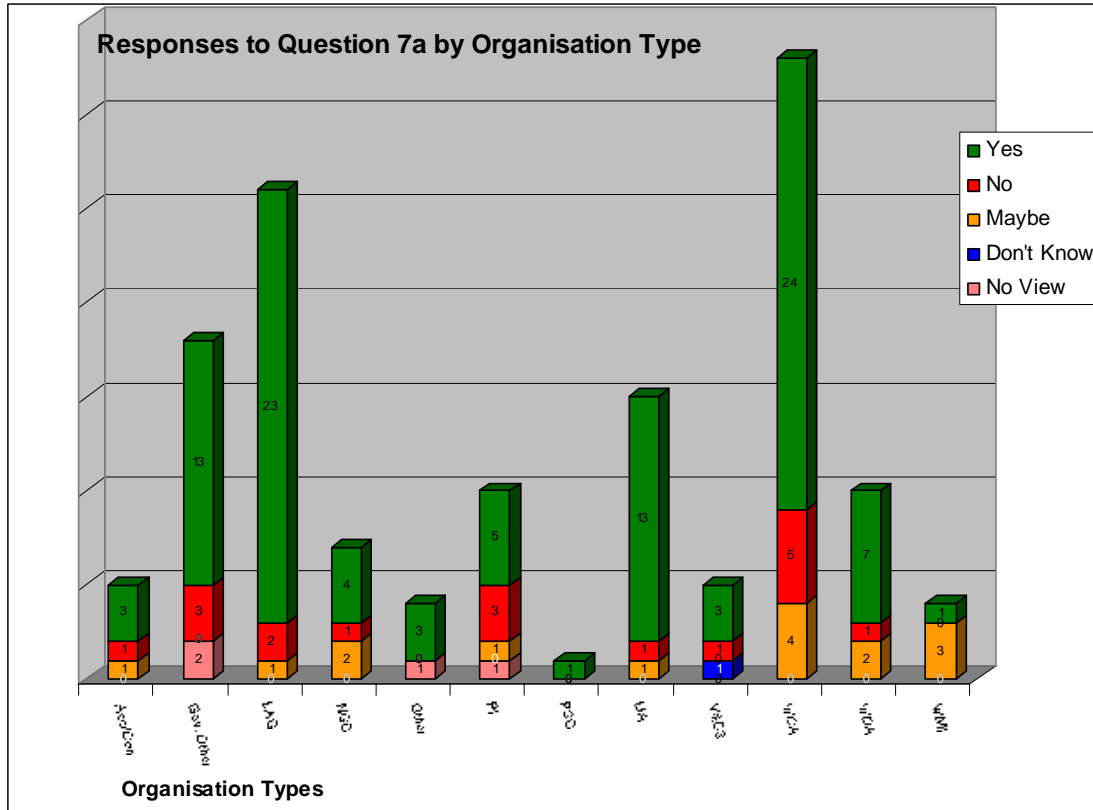
DNA = did not answer. This group is not included in Paragraph 89

91. If financial incentives schemes could be introduced to householders with respect to their kerbside collection services, then it was generally agreed that the Government should allow financial incentive schemes at CA sites to avoid household waste being diverted from kerbside collections to CA sites.

92. Many respondents also agreed that in two-tier areas, waste disposal authorities (who run CA sites) and waste collection authorities (who would administer the financial incentive schemes with respect to kerbside collection services) would need to work together to implement financial incentives. Some respondents added that schemes at CA sites may need co-operation with neighbouring WDAs due to the possibility of householders taking waste across local authority boundaries. While some suggested financial incentive schemes at CA sites could have the potential to contribute to an increase in

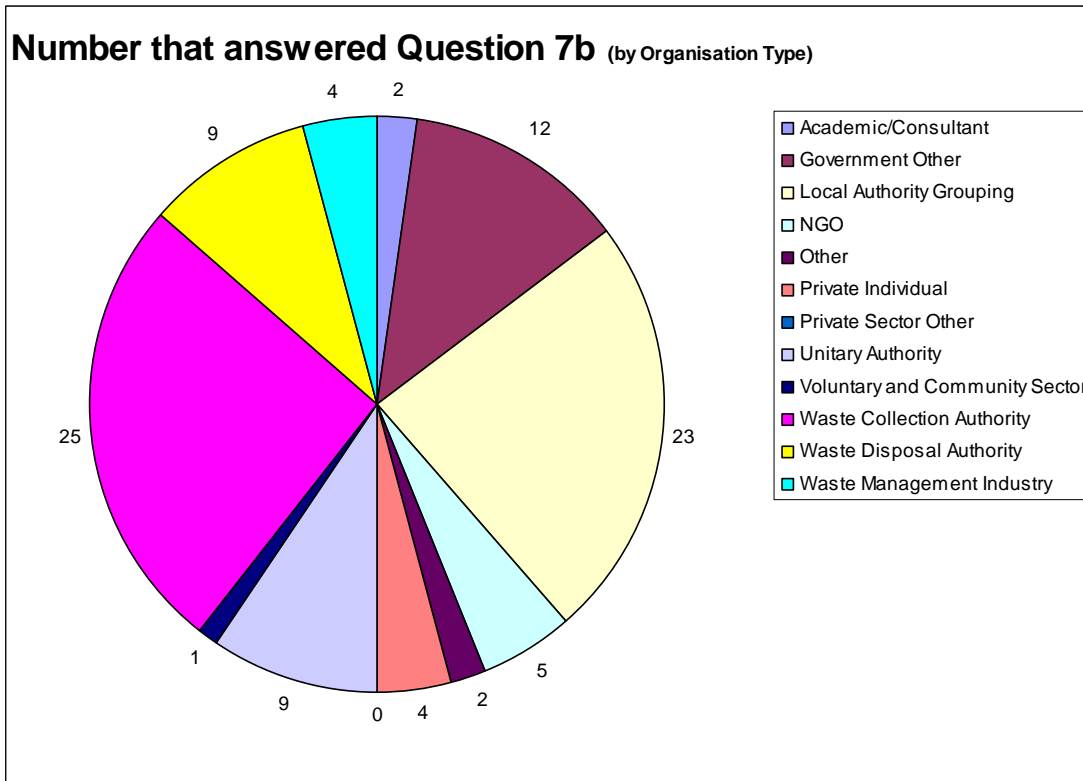
fly-tipping. Some expressed concerns that such schemes at CA sites could be administratively difficult.

93. The following table shows the answers given broken down by types of respondents:



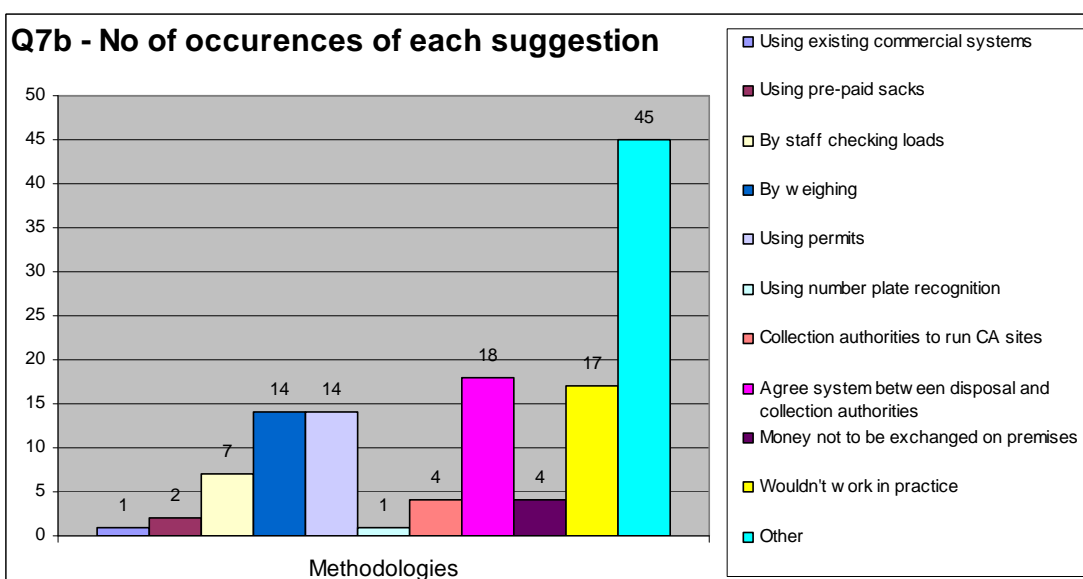
94. WDAs themselves were overwhelmingly of the view that schemes would need to be capable of being introduced at CA sites. One WDA said if WCA's had the power to implement the scheme, WDA's would require the same power for (CA sites) to avoid dealing with residual waste that householders were not leaving out for collection.

95. **Question 7b** asked how financial incentives at CA sites could be administered and was answered by 96 respondents.



0 = private sector-other

96. Comments were very varied and therefore difficult to capture. However, two prominent responses were to use permits at these sites (14 responses) or some kind of weighing system (14 responses). Some suggested that staff could check waste loads on site (7 responses). 18 people said that systems would have to be agreed between the WCAs and WDAs in two-tier areas. However, 17 respondents expressed doubts over whether financial incentives would work in practice at civic amenity sites. A summary of the methodologies suggested is as follows:



97. The LGA were clear that how schemes were administered at CA sites should be a matter for local government to determine at a local level, but suggested that they could include a gate fee, or tradable permits.

98. ESA suggested it may be possible to establish a financial incentive scheme through requiring people to register with their local facility.

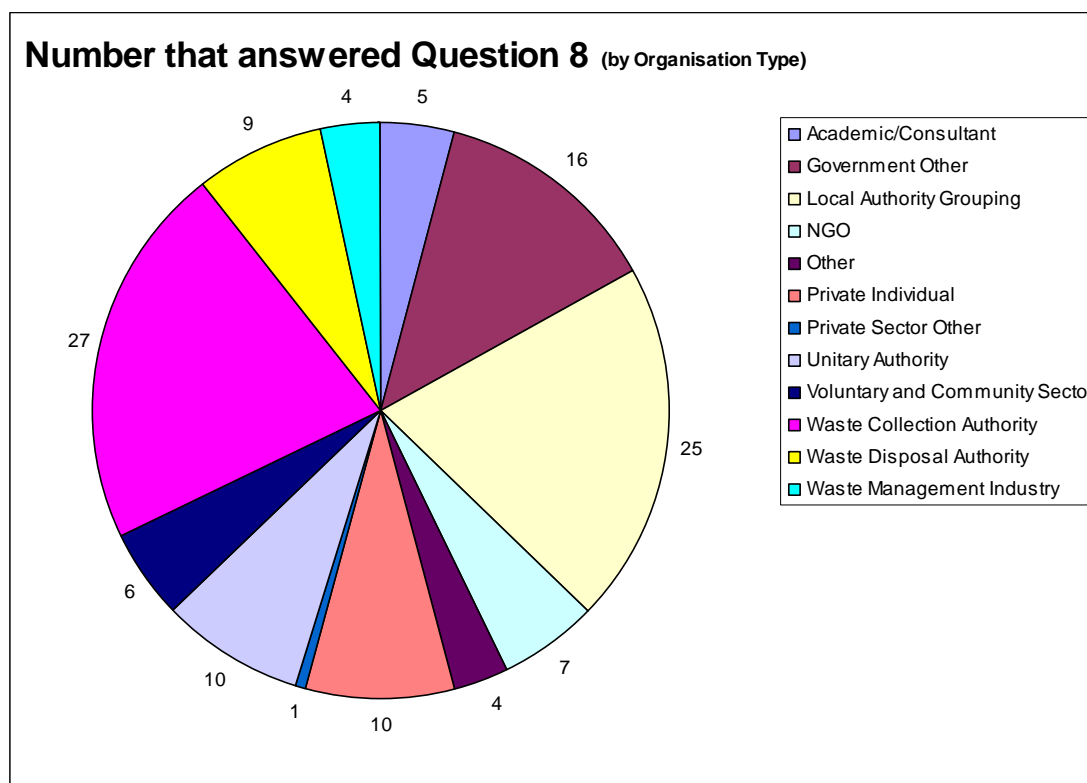
99. The “other” suggested ways of administering schemes at CA sites included some sort of credit arrangement; pre-paid card system bought from WDA; swipe cards (as used in parts of Europe) to open bins and that registers usage according to household; and a flat rate fee.

### Other issues to consider

100. Consultees were asked the following question:

#### **Are there other issues that Government needs to consider concerning financial incentive schemes? (Q8)**

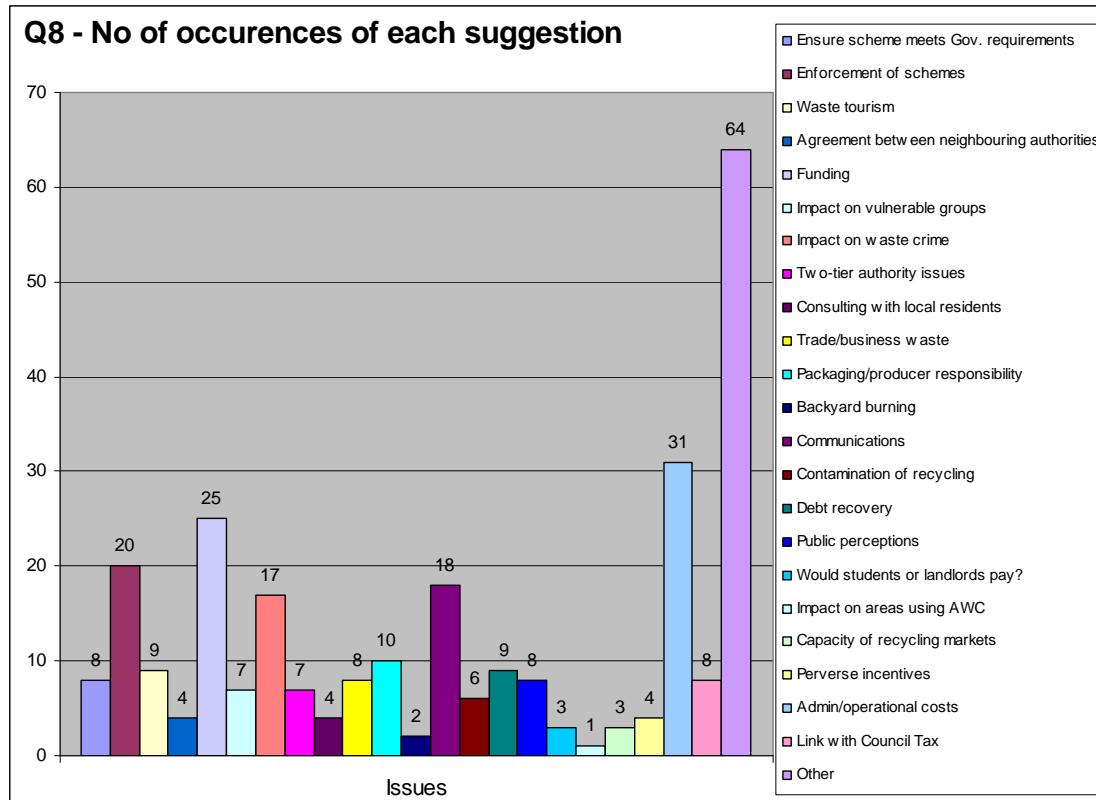
101. 124 respondents gave an answer to this question, as detailed by organisation type below:



102. Responses were, again, very wide ranging. The issues most often raised were that the Government needed to consider administration and operational costs associated with financial incentive schemes (31 responses cited this), and funding for local authorities’ waste operations (25 responses). Stakeholders wanted further consideration of how schemes would be enforced (20 responses), and debts recovered (9 responses). Of the 31 who cited administration and operating costs, this concern was highest among local authority groupings, with twelve out of the 25 responses to this question from this category.

103. Some respondents thought Government needed to consider communications (18 responses); the impact of financial incentive schemes on waste crime was also raised (17 responses). Other issues cited by a minority of respondents include: how to ensure schemes are fair and meet

Government requirements; how to avoid waste tourism (waste being taken by households to neighbouring local authorities); the impact on vulnerable groups; the need for public consultation by local authorities; Government’s approach to trade/ business waste, and to packaging and producer responsibility; public perceptions of financial incentive schemes; and how schemes would fit with Council Tax. The issue of introducing financial incentive schemes in two-tier areas (i.e. Counties and Districts where the waste collection and disposal functions are with different authorities) was also raised in both the formal and informal consultation process.



104. CIWM suggested fixed penalty notices could be served, if these were allowed by the legislation, but they flagged that there would be an issue of non-payment. Their suggestions included placing responsibilities on landlords, especially in areas of large student populations and that local authorities could give preferential planning for waste minimisation.

105. ESA said more consideration need to be given to how payments might be collected, whether a local authority might be expected to take full responsibility for revenue collection. CIWM were likewise concerned about possible levels of debt.

106. The LGA suggested that for schemes to have an impact, their evolution needs to be facilitated by ensuring maximum scheme flexibility, providing up-front funding of schemes, and creating a framework that ensures local democratic accountability.

107. The issue of flats and multiple occupancy dwellings was also raised by some respondents, as these types of properties provide greater challenges for provision of recycling services and implementation of incentives schemes direct to individual householders. It was suggested that consideration would need to be given as to whether they should be outside the scope of the

scheme or if local authorities would need to be able to identify a responsible person (i.e. managing agent or landlord) who would be registered as the scheme administrator for each building. One respondent suggested making recycling facilities a planning requirement for flats.

108. Further issues suggested for consideration, were: use of powers under Clean Neighbourhoods and Environment Act with respect to fly-tipping; whether guidance on whether existing legislation already provides powers for householder enforcement; various administrative complexities; how to meet up-front costs and it may seem to householders that they pay twice for their waste service; and council officer time..

### **Other barriers, models and powers**

109. The Government wanted to get respondents' views on other measures that could improve the sustainability of local authority waste management, and household behaviour with respect to waste. Therefore consultees were asked the following questions:

**Are there any other barriers that Government could address to help local authorities boost recycling and meet their obligations under the Landfill Allowances Trading Scheme? (Q2b)**

**Apart from the 'recycling incentive scheme', what other models might meet the aim of incentivising behavioural change without increasing the overall cost to local residents? (Q5)**

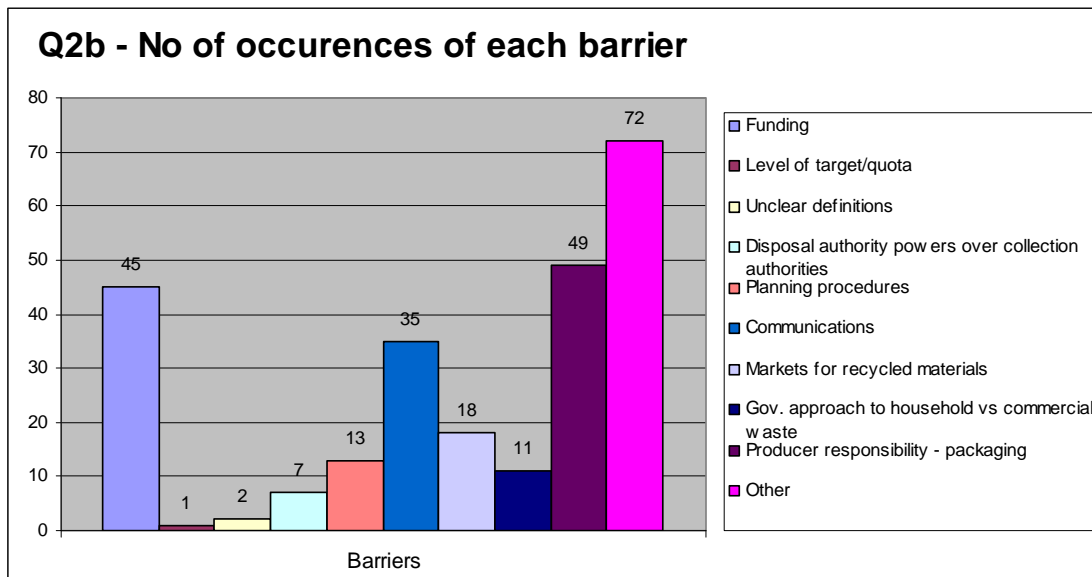
**Are there any other powers, currently not available to local authorities, that would help them:**

**a) encourage greater recycling and waste minimisation by households (Q9a) and**

**b) manage waste more effectively and efficiently? (Q9b)**

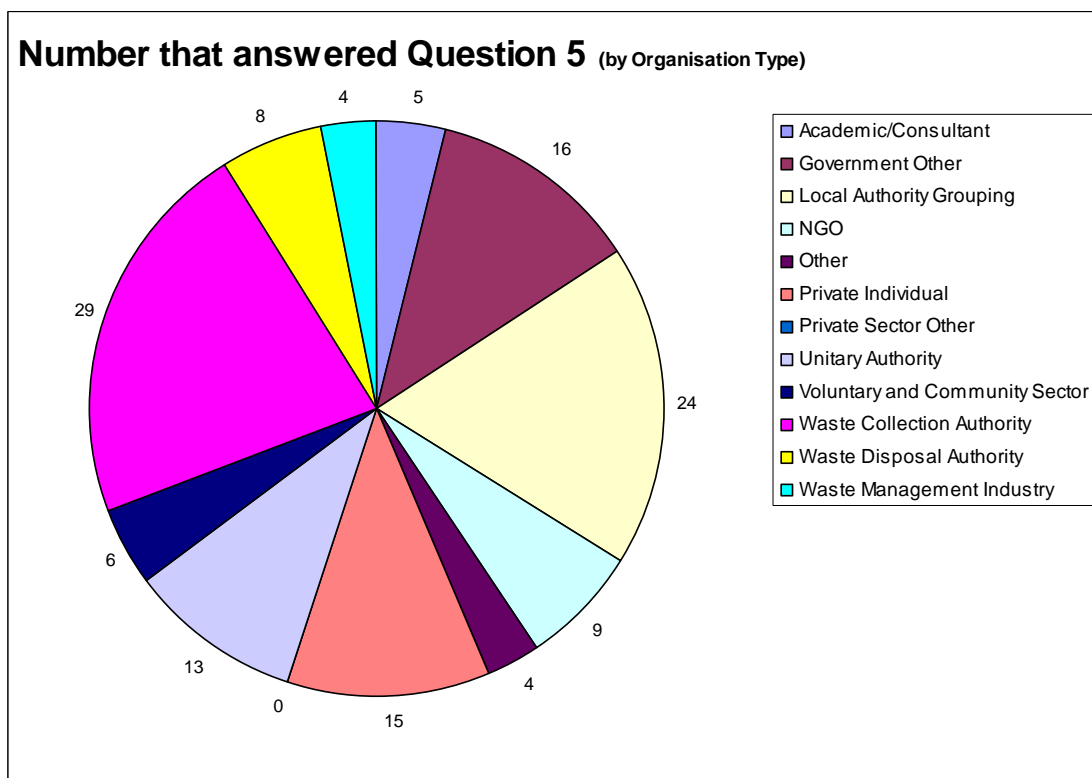
110. 140 respondents answered this question and gave examples in their answer to **Question 2b** of barriers that Government could address to help local authorities boost recycling and meet their obligations under the Landfill Allowance Trading Scheme. Responses covered a wide range of issues. Addressing packaging and producer responsibility was often mentioned (49 responses). Funding was also a frequently cited barrier (45 responses).

111. Other issues raised included communications with the public (35 responses); insufficient markets for recyclables (18 responses) and difficulties around the planning system (13 responses).



112. In addition to the specific barriers to meeting obligations under LATS listed in the chart, others mentioned by some respondents included home composting not being counted in recycling targets or as diversion from landfill, and issues to do with plastics (e.g. inconsistent plastics recycling across local authorities, and use of non-recyclable plastics).

113. 133 respondents addressed **Question 5** about other models for meeting the aim of incentivising behavioural change.

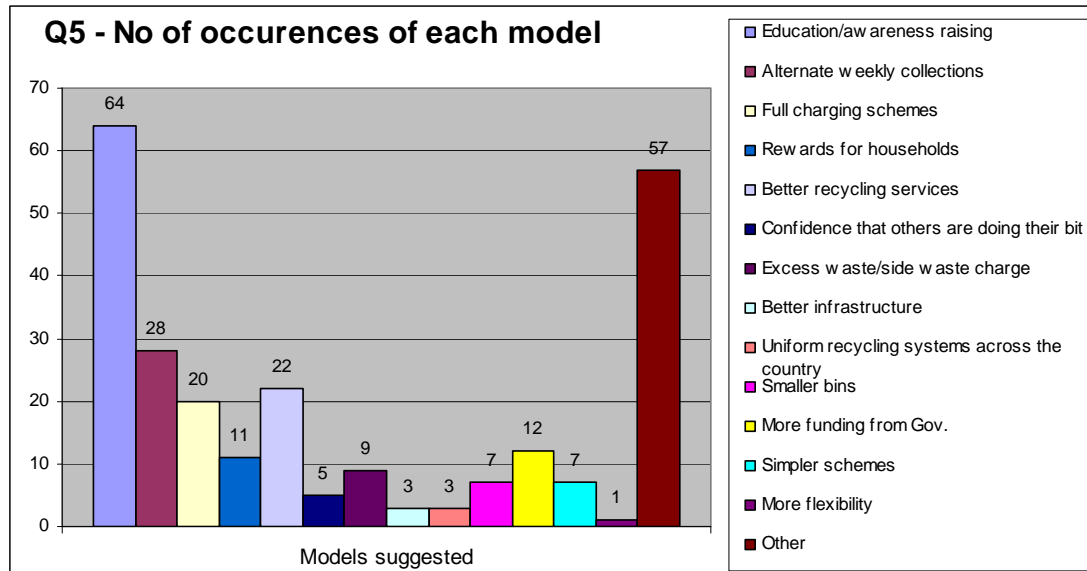


114. The most popular alternative model cited focused on education campaigns and awareness-raising among the public (64 responses).

115. Other models frequently mentioned were: implementing alternate weekly collection systems (28 responses); improved recycling services for households (22 responses); and – despite the fact that the question asked

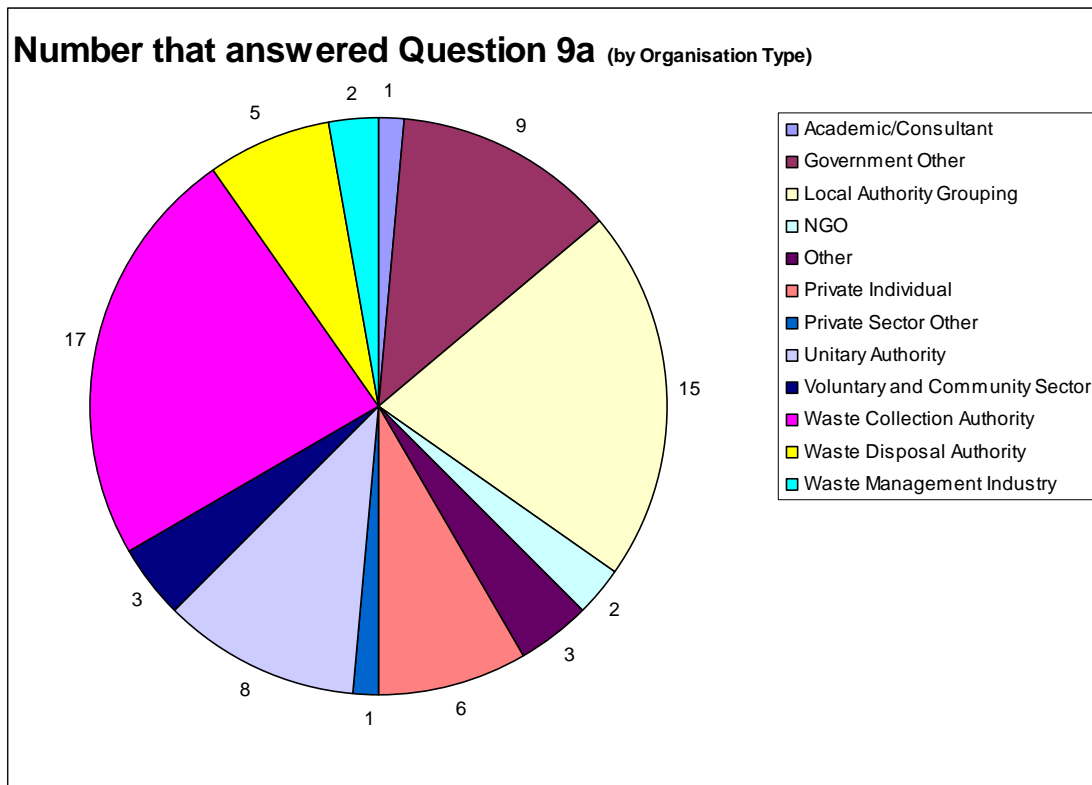
about models which didn't increase the overall cost to local residents – full charging schemes (20 responses).

116. This chart summarises the number of respondents favouring each model:

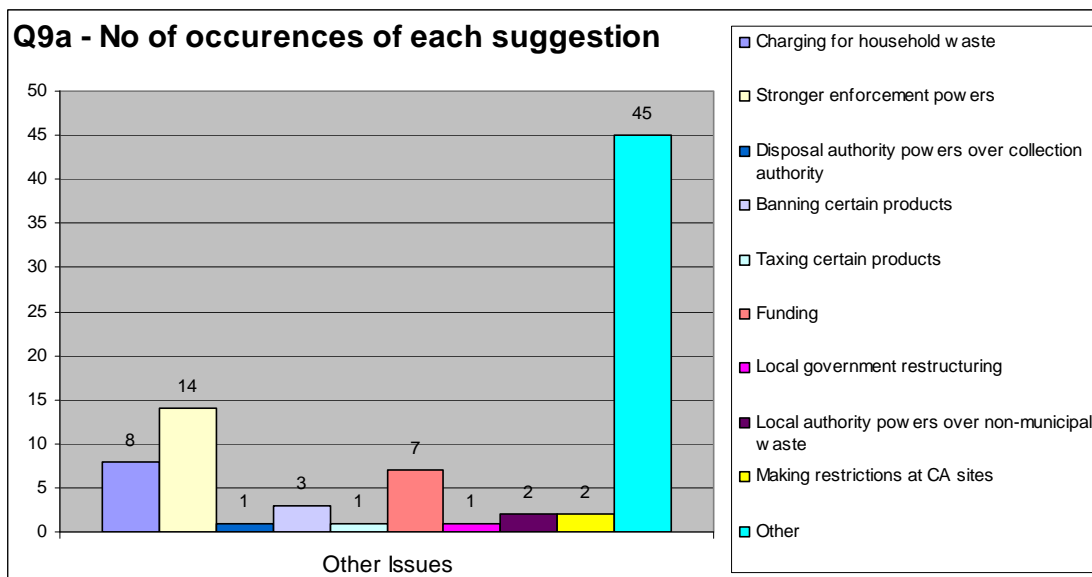


117. Other ideas additional to those specified in the chart suggested by respondents included further support to local authorities working in partnership with community organisations, enforcement/fines for non-recyclers, and better communications. FoE's suggestions included compulsory recycling schemes, but they said education and visits should be the initial focus rather than "enforcement" in such schemes. The LGA suggested action that could be taken to discourage food waste such as restraint by retailers on promotions that cause customers to over-buy.

118. As for other powers currently not available to local authorities to encourage greater recycling and waste minimisation by households (**Question 9a**), the numbers of responses to this question from the different types of organisation is shown in the chart below:



119. 72 suggested additional powers. Responses were, again, very wide-ranging. The following table shows the occurrences of each suggestion:

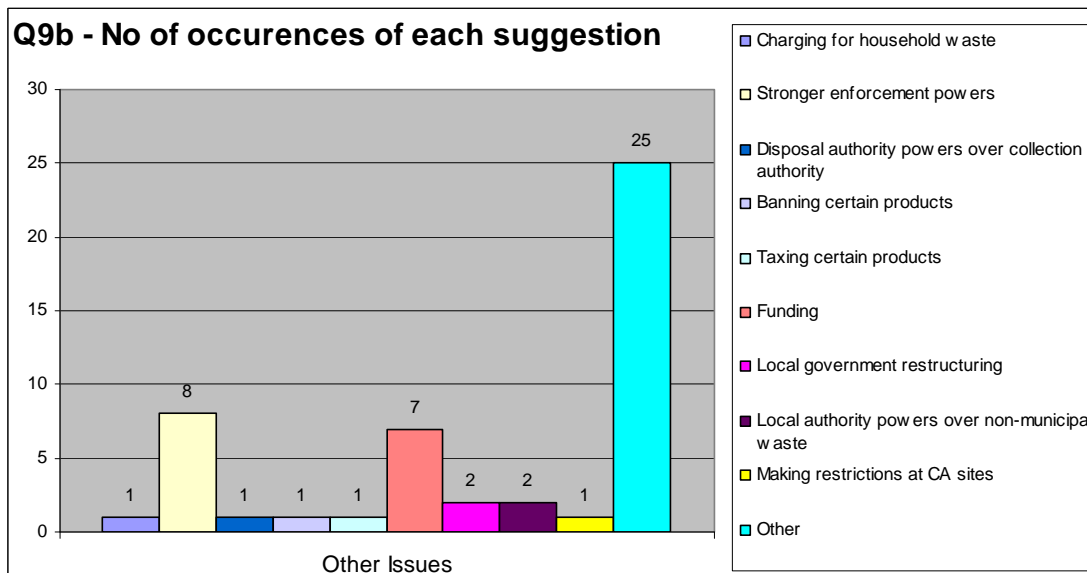
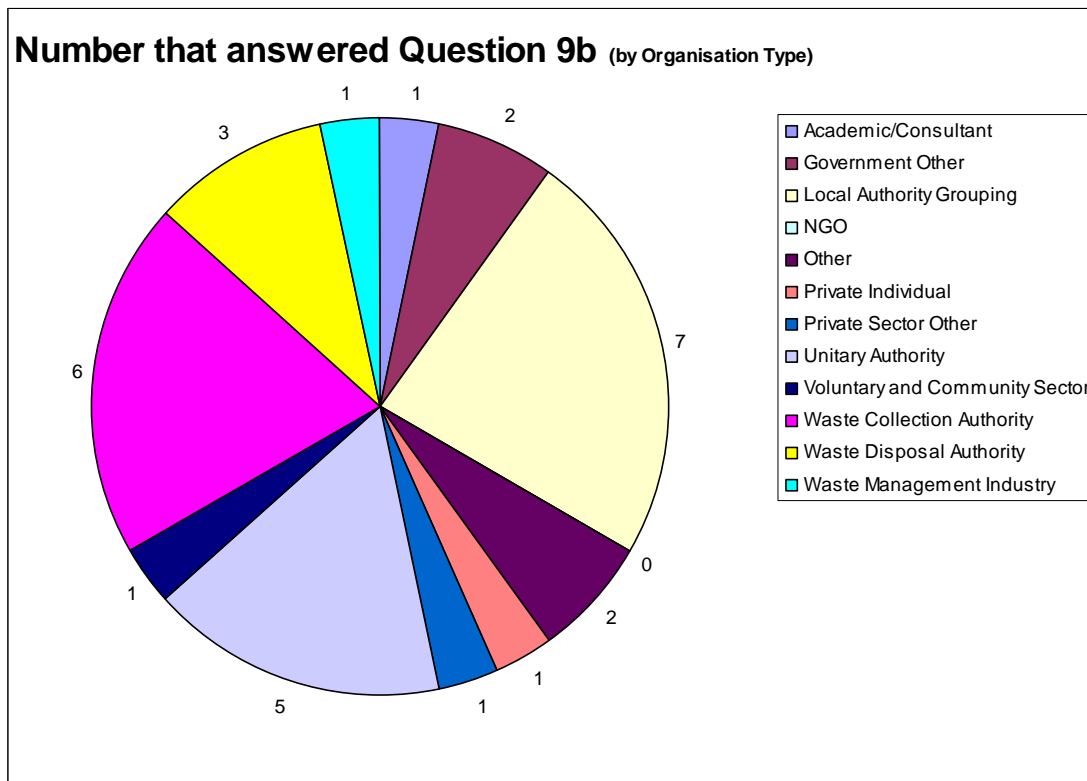


120. Some respondents felt local authorities needed stronger enforcement powers (14 responses). Some felt local authorities should be able to introduce full charging schemes (seven responses). This included FoE who said there was evidence that threat of penalties rather than promises of rewards were more effective in changing behaviour, adding that charging systems must be designed to avoid a disproportionate impact on low-income families through a rebate system similar to the one in operation for the Council Tax. Meanwhile, high fines would help prevent fly-tipping. Others raised the issue of funding again (seven responses).

121. "Other" suggestions included charges for excess waste; local authority support for social enterprises involved in reuse, recycling and composting;

powers for local authorities to prevent shops providing free single-use carrier bags and a duty to recycle for householders. Some respondents took the view that existing powers were sufficient and there needed to be more national awareness/education programmes.

122. 30 respondents answered **Question 9b** on powers for authorities to manage waste more effectively and efficiently. A significant proportion raised the issue of enforcement powers (eight responses) and more funding from Government (seven responses). Again, the following charts give more detail on the responses received by breaking down the respondents into types of organisation, and secondly showing the number of occurrences of each suggestion regarding additional powers:



123. Additional suggestions included getting the community sector and industry more involved in waste management, and the Police and Fire Authority Model was suggested as a way of doing this. Furthermore, any Joint Waste Authorities formed should be given powers to introduce financial incentives schemes. Several respondents suggested measures to reduce packaging, for example, a requirement, by regulation if necessary, for greater liaison between producers and local authorities and the waste management industry, charging producers for recovery and return of their products for recycling, and using Environmental Health Officers to check retailers, especially supermarkets, to help them reduce unnecessary packaging.

124. The LGA suggested powers to manage CA site waste inputs specifically to restrict the quantity of materials delivered and requirements to undertake segregation before deposit of waste.

## **Annex A - Summary of issues emerging from informal consultation**

- There was strong support for local authorities to be given the power to use financial incentives to encourage householders to reduce and recycle their waste.
- Stakeholders were generally pleased that Government had proposed a power rather than a duty. This approach recognised that financial incentives may be useful in some but not necessarily all local authorities.
- There were concerns that, if all money collected by the authority must be returned to residents in full, savings accruing to authorities might not be sufficient to cover costs, particularly of setting up and administering the scheme, at least in the short to medium term.
- Stakeholders identified additional complexities of administering any kind of financial incentives at Civic Amenity sites. Relatedly, it was frequently observed that Waste Collection Authorities and Waste Disposal Authorities would need to work together very closely in two-tier areas; and indeed that action would need to be taken to ensure waste wasn't diverted across local authority boundaries.
- Most stakeholders recognised the risks around fly-tipping and other illegal waste activity. The importance of effective communications with residents was frequently mentioned in this regard. However, several felt they needed stronger powers to enforce financial incentive schemes and ensure that debts were recovered from residents.
- Some stakeholders noted that financial incentives would be difficult to introduce in some types of housing, for example student houses, flats and multi-occupancy residences.
- A number of stakeholders were concerned that markets wouldn't exist to deal with significant increases in the amounts of recyclables collected from households.
- Related issues which were often raised were around funding provided to local authorities and producer responsibility for waste and packaging.

## **Annex B – List of respondents to consultation**

### **List of Respondents (Organisations)**

Association for Public Excellence  
ALCO (London public sector waste managers)  
Amber Valley Borough Council  
Association of Charity Shops  
Association of North East Councils  
Audit Commission  
Barnsley MBC  
Bedfordshire Authorities Waste Partnership  
Bexley Council  
Bradford MDC  
Buckinghamshire County Council  
Cambridge City Council  
Cambridgeshire Councils joint response  
Capel Action Group  
Castle Morpeth Borough Council  
Chartered Institute of Environmental Health  
Chartered Institution of Wastes Management (CIWM)  
Chartered Institution of Water and Environmental Management (CIWEM)  
Cheshire County Council  
Cheshire LGA Waste Task Force  
Chichester District Council  
Chorley Borough Council  
City of Lincoln Council  
City of London Council  
Common Resource Ltd  
Communication Workers Union - Merseyside & South West Lancashire Branch  
Community & Regional Planning Services  
Community Recycling Network UK  
Confederation of Paper Industries  
Cornwall County Council  
Countryside Alliance  
County Councils Network  
Coventry City Council  
County Surveyors' Society  
Cumbria Strategic Waste Partnership County Council  
Dartford BC  
Derbyshire County Council  
Devon Authorities' Waste Reduction and Recycling Committee  
Dorset Councils partnership  
Durham CC  
East Devon DC  
East Lindsay DC  
East Midlands Regional Assembly & EMRTAB  
East of England Regional Assembly  
East Riding Council  
East Staffordshire Borough Council  
East Sussex County Council  
Eastbourne Borough Council  
Ellesmere Port & Neston Borough Council  
Environment Agency

Environmental Services Association  
ESRC BRASS Research Centre  
Essex Waste Partnership  
Eunomia Research & Consulting  
Feering Parish Council  
Friends of the Earth  
Fyfield Parish Council  
Gateshead Council  
Greater London Authority  
Gloucestershire Waste Partnership  
GMW Ltd  
Great Waltham Parish Council  
Greatbaddow Parish Council  
Greater Manchester Waste Disposal Authority & five Metropolitan Borough  
Councils  
Green Alliance  
Guildford BC  
Halton Borough Council  
Hambleton DC  
Hampshire County Council  
Harrogate Borough Council  
Hertfordshire Waste Partnership  
Joint Waste Officers Waste Resources Management Forum for Herefordshire  
& Worcestershire  
Kirklees Council Officers  
Lancashire CC  
Lancashire County Council  
Local Authority Recycling Advisory Committee (LARAC)  
Leeds City Council  
Leicester City Council  
Leicester County Council  
Leicestershire Waste Management Partnership  
Lewes District Council  
Local Government Association (LGA)  
London Borough of Barking & Dagenham  
London Borough of Camden  
London Borough of Enfield  
London Community Recycling Network  
London Councils  
Macclesfield Borough Council  
Merseyside Waste Partnership  
Mike Tobin Consultancy Ltd  
Milton Keynes Council  
Mole Valley DC  
Nappy Alliance  
New Forest DC  
Newcastle-under-Lyme BC  
Norfolk County Council  
North Hertfordshire District Council  
North London Waste Authority  
Northamptonshire Waste Partnership  
Northumberland CC and 6 Districts  
Norwich city Council  
Nottingham City Council

Oadby & Wigston Borough Council  
Oxfordshire Waste Partnership  
Peterborough City Council  
Portsmouth City Council  
Preston City Council  
Project Integra  
Regional Waste Forum for the East of England  
Resources and Waste Group - sub group of Sustainable Development  
Roundtable for East of England  
Rother District Council  
Royal Borough of Windsor & Maidenhead  
Royal Tunbridge Wells Civic Society  
Royal Tunbridge Wells Town Forum  
Seaford Town Council  
South East Regional Assembly  
Sheffield City Council  
Shepway District Council  
Shropshire Waste Partnership  
SITA  
Somerset Waste Partnership  
South Bucks DC  
South Cheshire FOE  
South East England Regional Assembly  
South Gloucestershire  
Southend BC  
St Edmundsbury Borough Council  
Staffordshire Moorlands DC  
Staffordshire Waste Officers Group  
Stride Environmental  
Suffolk Coastal District Council  
Sunderland City Council  
Surrey Local Government Association  
Swindon Borough Council  
Takeley Parish Council  
Tees Valley JSU  
Telford & Wrekin Council  
Tendring DC  
The Chartered Institute of Waste Management  
The Environment Council  
The Society of County Treasurers  
Trafford Council  
Tyndale Council  
Valpak  
Wandsworth Council  
Warwickshire CC  
Waste Watch  
Waverley Borough Council  
Wealden District Council  
West Devon Borough Council  
West London Waste Authority  
Woking Borough Council  
Wastes and Resources Action Programme (WRAP)  
Western Riverside Waste Authority (WRWA)  
Wyre Borough Council

Plus 22 responses from private individuals.

NB: some responses could not be included in the analysis either because they did not address the specific questions asked in the consultation, or because they were submitted too late for this analysis.