

The devil is in the detail – our assessment of the Resources and Waste Strategy for England

After the UK leaves the European Union, Defra will become directly responsible for resources and waste policy for the first time in decades. As our relationship with natural resource consumption comes to the fore, this is a real opportunity to design a circular system which reduces environmental pressure whilst boosting economic growth. Following the government's commitment to make the UK "a world leader in terms of competitiveness, resource productivity and resource efficiency"¹, CIWEM published its "[Priorities for an Effective Resources and Waste Strategy](#)" in October 2018.

"[Our Waste, Our Resources: A Strategy for England](#)", published in December 2018, set out a long-term strategy to deliver a range of outcomes which would put England's economy on a more circular footing.

Here follows an assessment of the Government's Strategy, and whether it delivers on the five priorities we called for.

1. *Systems-based approach:*

The Strategy does focus on 'resources' rather than 'wastes' and uses the appropriate language for a systems-based approach, for example encouraging ecodesign and reducing residual waste. However, the focus of the Strategy seems too narrow and on too few products, such as plastics. We welcome the Strategy addressing this urgent issue, but would emphasise that there are other areas less at the forefront of the public conscience which also require urgent action, such as stemming the expansion of incineration, and food waste. Disappointingly, there is still too heavy a reliance on recycling, which as Defra's recently released statistics show yet again, is stagnating². The UK should look towards more innovative waste prevention strategies higher up the waste hierarchy, rather than falling back on recycling where the easy wins have already been achieved.

2. *Effective governance:*

The question of more effective governance remains unanswered following the publication of the Strategy, which will require strong leadership from Defra to achieve its ambitions. The forthcoming Environment Bill should set the targets from the Strategy and the 25 Year Environment Plan to minimise waste and use resources from nature more sustainably and efficiently on a statutory footing. The new environmental watchdog, the Office for Environmental Protection, will need to be far-reaching to ensure the government is held to account on progress on measures outlined in the Strategy and any legally-binding targets.

3. *Increased Extended Producer Responsibility:*

¹ HM Government. 2017. [Clean Growth Strategy](#).

² Defra. February 2019. [UK Statistics on Waste](#).

Increased EPR is covered extensively in the Strategy, however it is only a narrow expansion of the concept, with only five additional streams, (textiles, bulky waste, construction materials, vehicle tyres and fishing gear), and too much focus on plastic packaging. The Strategy focuses on replication of existing EPR schemes in other areas rather than imaginative new methods, individually tailored to specific resource streams. We suggested that clothing and textiles would be a suitable resource stream for EPR, particularly microfibres which are causing environmental harm and are difficult to dispose of. Successful EPR schemes drive change at the design stage, manufacturers must be incentivised to design ways to reduce their environmental impact and improve recyclability.

4. *Reform of the Packaging Recovery Note system:*

We are pleased that the Strategy contains acceptance of the weaknesses of the failures of the PRN system, particularly the way which the current system incentivises exporting packaging waste overseas. However, its focus on packaging seems too narrow, and the majority of the crucial measures, such as tackling environmentally irresponsible exports are unambitious, and still subject to consultation. The reforms are not set to be in place until 2023, which is still too far away.

5. *Data and measurement:*

We welcome the commitment to move away from a weights-based measurement system but there is no detail on the format a new system would take. However, it is noted that the table of indicators was nearly all measured in tonnes, likely due to the difficulty in accessing appropriate data. With the exception of measurement, most of the indicators identified are sound. A set of indicators linked to the Sustainable Development Goals would push the government further on the social and wellbeing side of indicators.

The Strategy is ambitious, wide-ranging and strategic. However, all too often the detail of measures which would have a real impact on moving the UK towards a more circular economy is severely lacking. We must focus on re-training consumers in re-use, repair, longevity, sharing and most importantly, changing consumer behaviour, which would naturally focus industry on upstream measures of resource efficiency. It lacks a feeling of permanence, and the timeline for delivery of most of the measures is disappointing. The government must maintain momentum and support their ambitions with sufficient means and incentivisation. We welcome the recently published consultations from Defra and HM Treasury which should fill in some of the missing detail, and we'll be analysing and responding to them over the coming weeks