



Review of the Resources and Waste Strategy



Executive Summary

➤ INTRODUCTION

At the start of 2024, CIWM set up a Task and Finish Group to review the Resources and Waste Strategy (R&WS), following discussions at its Policy and Innovation Forum. This was in anticipation of a possible change in Government and a general election that would happen in 2024.

The P&I Forum saw an opportunity within this possible political change to review where the R&WS was and what really needed to change to bring about the ambitions of net zero.

CIWM believes this review can support the new Government in their first 100 days that are seen as crucial for them to grasp what is needed for a more economic and resource resilient UK. It also provides the thoughts and foundations for the longer-term policy thinking and changes that are needed to create a resource resilient UK, move towards a circular economy and achieve net zero.

As a sector, there is a real need to move the UK to become a resource resilient country. The current Resources and Waste Strategy does not go far enough and does not contain the policy levers to achieve this. That means developing a new strategy for the sector, a Resource Resilience Strategy that is aimed at facilitating a move to a circular economy, that keeps

resources in economic use and brings about a change in the way products are designed and used. This change in perspective for the policy drivers impacting our sector will ultimately help to mitigate climate change.

The review was undertaken in two parts.

Part one

The first task of the working group was to undertake a fundamental review of the 2018 Resources and Waste Strategy (R&WS). They analysed the policies that had been proposed in it and how far the government had got in implementing them. There was also a recognition of the external context policy makers were operating in during this period that could influence their ability to get things done.

Part two

The second part then built on this and looked at where we are today and how conversations and thoughts have advanced since 2018. What would a strategy need to include today if you produced a successor to the R&WS? And more importantly, what should such a strategy be focused on and, at a high level, be looking to achieve and facilitate?





Part one: the past and the present

When the Resources and Waste Strategy was published in December 2018, it was met with a high level of support from the sector.


The Strategy was wide-ranging and included a large number of policy proposals, including several – such as the introduction of Extended Producer Responsibility (EPR) for multiple waste streams – that had the potential to revolutionise the UK’s approach to the crucial issue of resources and waste management.

The R&WS is over five years old and progress on implementing policies in it has been slow, leading to the sector becoming frustrated at the lack of progress and focus, which has concentrated almost solely on the “big three” policies of consistent collections, DRS and EPR.

There are some genuine reasons, outside the control of Defra, delaying the implementation of R&WS, mainly:

- 
Prime Ministerial and Ministerial Changes post 2018¹
- 
Preparing for EU Exit
- 
The Covid-19 pandemic



 CIWM have summarised the few areas where R&WS proposals have been fully implemented (the green list), followed by those partially implemented (the amber list). It ends with a list of all the policies which have yet to be implemented (the red list). These are detailed in Annex 1 of Part One.



CIWM determined eight policies that have been fully implemented by Government. In some instances, their real-world impact is currently unclear. It is also interesting to note that Defra was the lead department or organisation on only three of these policies.

- Plastic packaging tax (HM Treasury)
- Greening government commitments (Cabinet Office)
- Mandatory food waste hierarchy (Defra)
- Appointing a food waste champion (Defra)
- Food labelling (Defra)
- Creation of a Joint Unit for Waste Crime (Environment Agency)
- Strengthen intelligence gathering (Environment Agency)
- Introduction of Conditionality (HM Treasury).



CIWM scored 21 policies as amber entries. Amber entries are those that show some progress or have been implemented. The full list is shown in Annex 1 of Part One.

Some examples of key policies listed as amber are:

- Implementing Extended Producer Responsibility (EPR) for packaging
- Improving levels of eco-design
- Encouraging an expansion in reuse
- Introducing mandatory food waste reporting by businesses.



There are ten policies that are scored as red entries. Red entries are listed due to, at most, only being in their first steps, either with a consultation or legislation drafted along with stakeholder engagement. The full list is shown in Annex 1 of Part One.

Some examples of key policies that CIWM have listed as red are:

- Introducing EPR for other waste streams than packaging
- Introducing a Deposit Refund System (DRS) for drinks packaging
- Introducing consistent household waste collections in England
- Introducing mandatory weekly food waste collections across the whole of England
- Reform Carriers, Brokers and Dealers regime.



The thoughts and conversation around resources, carbon and climate change have also progressed considerably in the past five years and the concept of the circular economy is now very much to the fore. In some respects, this makes the R&WS already look dated and perhaps not fit for what is now needed when it comes to keeping resources in economic use in the UK.

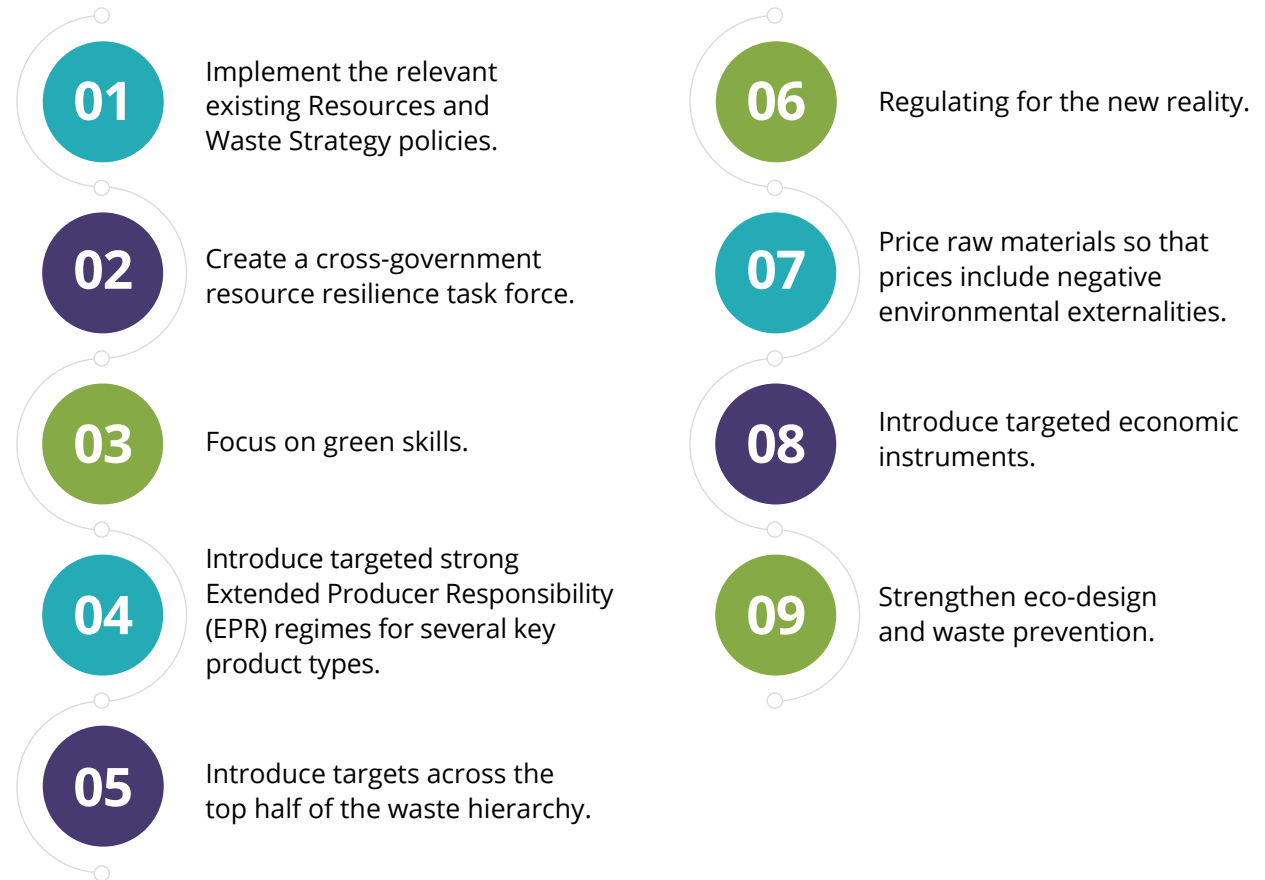


Part two: the future

CIWM believes it is not just about producing a new strategy full of good policies, there must be full implementation, moving forward any objectives with robust action plans and effective monitoring of progress. We must learn the lessons of previous strategy implementation so that meaningful outcomes are delivered.

CIWM is therefore calling for Government to commit to a new strategy – a Resource Resilience Strategy – which continues to drive forward the best elements of the existing R&WS, but integrates further policy asks into an updated narrative reflecting the key strategic and political drivers of action in this area in 2024 and beyond.

CIWM has chosen nine policy measures which should be included in a new Resource Resilience Strategy.





In CIWM’s view, two key objectives need to be stated clearly upfront in the new strategy and everything that follows should link back to them, to ensure that there is clarity of focus.

In 2024, there are two high priority objectives for action in our area:

Objective 1



Delivering a circular economy; and

Objective 2

Ensuring our sector plays a full part in helping the UK achieve net zero



CIWM believes that the successor to the R&WS should include:



A move to get to the heart of what is needed to drive better product stewardship, e.g. widespread carbon taxation, relaxation of VAT on reuse, more work on product standardisation.



Better alignment with other policies / strategies, e.g. industrial strategy, development of clean-tech, building domestic supply chain resilience, alignment with Advertising Standards Association position on green claims, etc.



Focus on consumption not production, not just counting domestic raw material usage and climate emissions, but incorporating those associated with our imports of products and services from abroad, to be used by UK consumers. This urgently needs to change if we are to get an accurate view of the actual impact of the UK on global resource use and circularity.



Conclusion

Progress on implementing the policies proposed in the 2018 R&WS has been slow and in those five plus years, the context our sector operates in has changed.

It is no longer about maximising recycling, it is about the move towards a circular economy, the progress towards net zero and then through both of these helping to mitigate the impacts of climate change. Even if we saw all the policies in the R&WS implemented, they are not designed to do this to the scale or at the pace that is needed.

A new Resource Resilience Strategy is needed with policies that are focused on the circular economy and net zero. This does not mean abandoning all the policies in the R&WS, CIWM members and the sector expect to see consistent collections/simpler recycling, pEPR, reform to Carrier Brokers Dealers and digital waste tracking fully in place.

CIWM has produced nine policy asks the Resource Resilience Strategy should have that the Institution believes will see the UK take great strides in the right direction. They are not yet fully formed and do not provide all the answers. But they do provide part of the answer and show where we need to ask further questions along with where the sector can support the new UK Government and other policy makers across the UK and Ireland. Throughout the 125 years that

CIWM has existed, our members have been providers of solutions to others' problems, the problems society were content to throw away. Now we are in a place where we can provide solutions to keeping resources in economic use, reducing the take on the planet and moving to a resource resilient UK.

➤ Our members, our sector, our profession can work with policy makers in a way that means we will move to a world beyond waste. This review outlines how we can take those next few steps on that path.





PART ONE

> The past and the present

Review of the 2018 Resources & Waste Strategy for England

The Resources and Waste Strategy is over five years old and progress on implementing policies in it has been slow.

The sector has become frustrated at the lack of policy implementation and focus was almost solely on the “big three” policies of consistent collections, DRS and EPR. What was needed was a thorough review of the strategy, to remind ourselves of the policies that were promised and the progress that had been made on all of them. What was the true picture for the sector, what had been done and what still needed to be done?

By reviewing the progress and having a clear picture, it would then mean we know what the scale of the current problem is. The discussion has moved on since 2018 and the circular economy, net zero and climate change mitigation are much more to the fore. The review helps to see what parts of the strategy are still relevant and need implementing, and where the gaps are that might need a new set of ideas and policies.

INTRODUCTION

When the Resources & Waste Strategy (R&WS) was published in December 2018, it was met with a high level of support from the sector.

The Strategy was wide-ranging and included a large number of policy proposals, including several – such as the introduction of Extended Producer Responsibility (EPR) for multiple waste streams – that had the potential to revolutionise the UK’s approach to the crucial issue of resources and waste management.

However, in the five years since the Strategy was published, implementation of those proposals has been extremely limited. Most of the key proposals are behind schedule, while some have been reduced in scope or cancelled completely. Useful recent summaries of these problems are contained in:

- the Public Accounts Committee’s report published on 1 December 2023²; and
- the Office for Environmental Protection’s Progress Report for 2022/23, published on 18 January 2024³.

In this first part of the paper, we review what was promised in 2018 against what has – and has not – been delivered by the middle of 2024. In the second part of the paper, we then go on to consider some of the key issues that were not addressed in the R&WS, and which need to be included in any successor.

It is important to acknowledge that there are some genuine reasons, outside the control of Defra, why implementation of the R&WS has been slower than was intended. CIWM believes the three main ones are:



Prime Ministerial and Ministerial Changes post 2018¹



Preparing for EU Exit



The Covid-19 pandemic





Prime Ministerial and Ministerial changes post 2018

When the R&WS was published, Theresa May was the Prime Minister (PM). However, she was unable to successfully conclude negotiations with the European Union (EU) over the terms of the UK's withdrawal from the EU, in a way that would meet with the approval of the UK Parliament, which ultimately led to her resigning as PM in May 2019.

A leadership election followed, with Boris Johnson succeeding her as PM in July 2019. Finding himself unable to gain Parliamentary approval for his plans for EU Exit, he called a General Election in October 2019, with the election taking place in December 2019. In July 2022, Boris Johnson resigned as PM. This led to another leadership election, with Liz Truss eventually becoming PM on 6 September 2022. She was Prime Minister for 44 days before she resigned, which led to Rishi Sunak succeeding her on 25 October 2022 as the fourth UK Prime Minister in three and a half years.

Each period of instability has led to a pause in policy making until civil servants can be clear what the priorities of the new Prime Minister are. Most recently, environmental policy has been a low priority under both Liz Truss and Rishi Sunak, leading to further delays and changes in policy focus.

There were also numerous Environmental Secretary changes at Defra, adding to delays – Steve Barclay replacing Thérèse Coffey, who followed Ranil Jayawardena, George Eustice, Theresa Villiers and Michael Gove.



Preparing for EU exit

Over the second half of 2019, prior to the UK's formal exit from the European Union (EU) on 31 January 2020, staff at Defra, including several of those working on R&WS implementation, were partly or wholly diverted from their normal roles to deal with the urgent policy work needed in case the UK exited the EU without an agreed withdrawal deal.



The Covid-19 pandemic

For very good reasons, this took priority over all other issues globally for much of the period from March 2020 until the widespread roll-out of vaccinations over the first half of 2021. This caused significant delays in policy development and occupied much management time across government and the sector over this period, pushing other issues to one side.

General

While the three reasons are all understandable, it does not explain the slow pace of progress in implementing the R&WS. Even with the events listed, it is believed that policies should be further along and is a source of concern both within, and for the resources and waste sector.



What has, and has not, been implemented

Given the very limited progress that has been made to date, CIWM have summarised the few areas where R&WS proposals have been fully implemented (the green list), followed by those partially implemented (the amber list). We end with a list of all the policies which have yet to be implemented (the red list).

A full review of the implementation of the 2018 R&WS is set out in Annex 1 of Part One.



Green list – fully implemented

CIWM are aware of eight policies that have been fully implemented:

- Plastic packaging tax (HM Treasury)
- Greening government commitments (Cabinet Office)
- Mandatory food waste hierarchy (Defra)
- Appointing a food waste champion (Defra)
- Food labelling (Defra)
- Creation of a Joint Unit for Waste Crime (Environment Agency)
- Strengthen intelligence gathering (Environment Agency)
- Introduction of Conditionality (HM Treasury).

Although all eight of these policies have been fully implemented by Government, in some instances their real-world impact is currently unclear. It is also interesting to note that Defra was the lead department or organisation on only three of these policies.



Amber list – partially implemented

There are 21 policies that are scored as amber entries. Amber entries are those that show some progress or have been partially implemented. The full list is shown in Annex 1 of Part One.

Some examples of key policies listed as amber are:

- Implementing Extended Producer Responsibility (EPR) for packaging
- Improving levels of eco-design
- Encouraging an expansion in reuse
- Introducing mandatory food waste reporting by businesses.



Red list – not yet implemented

There are ten policies that are scored as red entries. Red entries are listed due to undertaking initial steps, either with a consultation or legislation drafted, along with stakeholder engagement. The full list is shown in Annex 1 of Part One.

Some examples of key policies that CIWM have listed as red are:

- Introducing EPR for other waste streams than packaging
- Introducing a Deposit Refund System (DRS) for drinks packaging
- Introducing consistent household waste collections in England
- Introducing mandatory weekly food waste collections across the whole of England
- Reform Carriers, Brokers and Dealers regime.



The table below outlines the progress of some of the key policies contained in the R&WS, over the past five years.

YEAR	MILESTONE	PROGRESS
2019	DRS introduced	Not achieved – Postponed until 2027
	Recyclables quality assured	Not achieved – Mix of comingled and source separation collection still occurring
	EPR	Not achieved – Postponed until 2025
	Food waste champion	Achieved – Ben Elliot appointed
	Biodegradable plastic standard	Delayed – Published 2021
	Consultation on food waste reporting	Delayed – Published 2022
	CE Transposition	Delayed – Published 2020
	Consultation on food waste reporting	Delayed – Published 2022
	Digital waste tracking	Not achieved – Delayed to 2024
	Review of high-risk waste permitting exemptions	Delayed – Published 2024
2020	WEEE Consultation	Delayed – Published 2023
	50% HH waste recycling	Not achieved – 44% currently
	Removal of SUP for Gov property	Not aware of any action
2023	DRS rollout	Not achieved – Postponed to 2027
	Packaging EPR	Not achieved – Postponed to 2024
	Legislation for mandatory separate food waste collections	Not achieved – Expected 2024
	Revision of Resources and Waste Strategy	Delayed until 2024





Issues that have arisen during implementation of the strategy

Timescales for many of the key reforms have slipped, and it is not yet clear if the new Government will produce a clear plan for ensuring that longer-term targets can still be met given the ongoing delays.

The milestones set out do not include the extension of Emissions Trading Scheme (ETS) to cover energy-from-waste, so in any update of the implementation plan this needs to be addressed given the significant financial impacts it will have on local authorities and the wider waste sector. There are wider issues that the Government needs to address in this context, such as the inclusion of fossil content as one of the factors affecting the modulation of producer fees under EPR.

It is inevitable that different parties and organisations will have specific interests (and that these will differ, sometimes significantly, within sectors). The task for Defra has therefore been to fully understand these differences, to find workable compromises that deliver on the wider environmental needs, and to lead the implementation of these. However, it is recognised that this has been a very difficult thing to do as the world of waste / secondary resources is legally and commercially complex. The 'sprints' that were set up to help

Defra develop a way forward for packaging EPR brought the value chain together in a coordinated way, but the timescales that Defra originally set out for this process slipped significantly. In addition, the number of obligated producers that are engaged on EPR appears to be relatively small.

Ideally Defra needs to focus on achieving its strategic objectives of reducing society's environmental impact (including achieving Net Zero) in a timely way and at the lowest overall cost to society. In doing so, it will need to have regard to the distribution of those costs and will therefore need to come back to the questions of who is able to make choices that drive such improvements (product and service design, energy generation, transportation, usage-impacts, product return post-use), and how to steer them to make choices that meet Defra's strategic objectives.

In doing this, Defra needs to keep all sectors focused first on the same outcome, and to keep all sectors confident that they will not be commercially disadvantaged relative to any competitors (including those who substitute products or services). Otherwise, there is the risk of each party just fighting for its own interests.

The need for investment is evident across the value chain, whether by local authorities in services, the waste industry in new/expanded facilities, or producers in supply chains. However, there is no structure in place for ensuring this investment is coordinated across the whole value chain to deliver the best overall outcomes, nor does it appear that Defra intends to actively manage this or provide bankable circumstances; instead, Defra appears to be leaving it to the market.

➤ A clear and realistic plan for driving investment across the value chain by both the public and private sectors is required, backed up by appropriate regulations that give investors (including local authorities) the certainty they need to justify capital outlay and revenue commitments.

Links to other strategies

There is little mention made in the R&WS of the interim municipal waste arisings reduction targets to be achieved by 31 January 2028. These were announced through Defra's five-year Environmental Improvement Plan as a first revision of the 25 Year Environment Plan but get virtually no mention. It's also the case we now have government policy positions that directly counter the aims of waste reduction targets, e.g. the position in Simpler Recycling that residual waste should be collected no less frequently than fortnightly. There is clear evidence here of a lack of joined-up, complementary policy making.

From a household / municipal waste perspective, actions at the top of the hierarchy have continued to receive far too little focus / support in any of the strategy-related commitments. Whilst waste reduction has been subject to consultation in England as a nation, it is lagging far behind where Wales is, in relation to circular economy. The whole issue of resource efficiency, joining up secondary commodities with manufacturing, seems to have been forgotten about. External factors linked to global supply chain disruptions have done more to motivate change than any Government strategy in this space.

Impacts on regulation

CIWM believes that the Environment Agency (EA) remains severely under resourced, particularly in terms of front-line staff, which makes it difficult for them to regulate effectively in some cases. This means that there is a danger that illegal waste site numbers are higher than the sector and the regulator want them to be. Illegal waste exports have been a challenging area for the EA, particularly when it comes to having to repatriate illegally exported waste.

The creation of the Joint Unit for Waste Crime has been one of the successful deliverables from the R&WS. It shows that investment in good regulation is required and that by providing resources, progress can be made on removing criminality from the sector.





Issues for local government

Finance

The current approach to new burdens does not appear to fully cover the costs of implementing new collection arrangements for food waste. The system needs to ensure that it does not leave any local authorities worse off as a result of national changes; this is especially true for food wastes but will apply to other wastes/changes too.

The R&WS contained a commitment to the “polluter pays” principle and for producers to pay the “full net cost” of their products through their whole life cycle, including recycling and disposal. The emerging approach to EPR payments appears to not fully implement those ambitions and will leave local authorities having to fund some aspects of packaging collection, recycling and disposal. Local authorities award all waste contracts as the best available in the market at the time and will have been subject to internal and external scrutiny/audit of this at the time. It is not reasonable for EPR payments to reassess this retrospectively. It is essential that local authorities are now able to specify new contracts that align with the new EPR, DRS, Simpler Recycling and ETS regimes. For example, in East London over the next six months they are preparing residual waste contracts to commence in late 2027 and run

for 10-15 years. Going forward, the interests of producers and local authorities will be aligned strategically, as both will want to see value-for-money for themselves, consumers and residents; but producers cannot additionally be second-guessing the outcome of properly run local authority procurements.

- Overall, local authorities would benefit from a clear and stable policy and legal environment so that they can procure in good time with fair and value-for-money risk allocations so the private sector can invest in a timely way.



Operations

Local authorities (and others) require a clear line on if/when a DRS will be implemented and what the precise scope of it will be. This is important as it has the potential to make a significant difference to recycling and residual waste contracts, due to changes in both waste volumes and composition (which will in turn affect throughput and value to relevant contractors).

A key issue is Government needing to provide a clear policy and legal environment that recognises the real-world practical lead times for change. In the meantime, contracts are expiring and having to be replaced, but local authorities cannot specify with any precision what their needs will be and when, which undermines value-for-money to the public purse. It appears that business-to-business services will also have the same difficulties, but if they are free to procure in a nimbler way, this may not have quite the same impact on them.

Having different implementation years for changes to commercial waste collections and household waste collections creates potential issues for local authorities (and their contractors, collection and treatment) who often combine these for economies of scale.

Behaviour change

EPR and ETS both represent a commercialised approach to driving a more circular economy, but there has not been sufficient recognition that local authorities have statutory duties with regards to waste and recycling as well as limited powers to enact behaviour change. A comprehensive new set of powers is likely to be required to drive up participation in recycling services, particularly in multi-occupancy developments. This should include more powers under the planning process to require new developments are designed to encourage higher levels of recycling, both now and in the future as services evolve. CIWM would like to see Defra consult with local government about either the restoration of enforcement powers in this area, or the design of new enforcement powers to accompany the new pEPR environment and subsequent EPR regimes.





Views from the resources and waste sector

CIWM contacted a cross-section of members as part of undertaking this review and sought their views on the progress of the R&WS. Some of their thoughts are outlined below.

“Some credit must be given to the progression of various consultations and the general ‘mood’ that there has been much more to talk about as a result of the R&WS. However, my headline conclusion is that it has probably hindered short-term progress (e.g. towards higher recycling) because the delays getting clarity on measures such as Consistency, EPR have meant decisions have been postponed (on changes to collection services etc.)”

“Time will tell whether the political ‘wind-back’ on comingled collections will prove to deliver high quality recycling and resources for a locally (UK) sustainable circular economy; technology developments, e.g. AI, image recognition, robotics, probably has the greatest potential to salvage the situation. I see too many really badly contaminated recycling bins from flats, businesses, recycling on-the-go etc. to think that just carrying on as we are now (as is pretty much proposed in England) will lead to a better outcome.”

“Moreover, the politically motivated move back from multi-stream collections, due to the perception of too many containers, and restrictions on the frequency with which local authorities can collect residual waste goes counter to all of the evidence around what is needed to achieve higher, better-quality recycling. Defra has lost credibility in this regard and the messaging I hear from local government is that officers within the department lack the domain knowledge needed to build confidence that the right decisions are being taken.”

“I have worked on various local authority options appraisals and strategy reviews over the past 6 years that have ‘gone through the motions’ or have subsequently sat on shelves waiting for clarity that never came. It is interesting to observe that in our options evaluation exercises cost was being given a much lower weighting in the period when new burdens and other measures were first mooted. That has now reverted given that the reality of local government financial positions has come to the fore in the past 12-18 months.”



Conclusion

The past five years since the R&WS was published have been some of the most turbulent in recent times, with global events having local impacts.

Progress on delivery of the policies in the R&WS do need to be considered against this backdrop. The thoughts and conversation around resources, carbon and climate change have also progressed considerably in the past five years and the concept of the circular economy is now very much to the fore. In some respects, this makes the R&WS already look dated and perhaps not fit for what is now needed when it comes to keeping resources in economic use in the UK.

However, the R&WS promised a step change in resources and waste policy, a once in a generation shift. This means that the amount of change the waste sector is facing is the biggest in decades. There is feeling amongst some in the sector that it feels rushed and ill thought through, with a lack of clarity or guidance and yet timescales coming thick and fast. There is a danger these ever-changing and often condensed timetables will not be deliverable. Industry will be reluctant to invest without the certainty that the detail brings and this leaves us in a precarious position.

➤ CIWM believes that a number of key policies from the R&WS are still relevant and need to be seen through and implemented. If they are not then recycling rates will not increase and the sector will become less attractive to investors and so less able to play the key role it has in moving the UK to a circular economy.



PART TWO

> The future

The need for a Resources Resilience Strategy

Moving from a Waste Strategy to a Resources and Waste Strategy in 2018 was seen as ground-breaking during its development, but the planet's natural resources have become more finite since then, with advances in technology and war-torn areas limiting access.

CIWM members believe, as a sector, there is a real need to move the UK to become a resource resilient country. The current Resources and Waste Strategy does not go far enough and does not contain the policy levers to achieve this. That means developing a new strategy for the sector, a Resource Resilience Strategy that is aimed at facilitating a move to a circular economy, that keeps resources in economic use and brings about a change in the way products are designed and used. This change in perspective for the policy drivers impacting our sector will ultimately help to mitigate climate change.

But it is not just about producing a new strategy full of good policies, there must be full implementation of these policies, moving forward any objectives with robust action plans and effective monitoring of progress. We must learn the lessons of previous strategy implementation so that meaningful outcomes are delivered.



INTRODUCTION

When the Resources & Waste Strategy (R&WS) was published in December 2018, it was met with a high level of support from the sector.

However, implementation over the succeeding five years has been both partial and slow, as outlined in part one of this report. In addition, the resources and waste agenda has continued to develop and has moved on since 2018.

The 2018 Strategy was primarily focused on waste, i.e. what can be done to improve things around the middle of the waste hierarchy. All of the areas of traction / media attention over the past few years have still been focused on recycling, e.g. Consistency / Simpler Recycling / DRS. Whilst Extended Producer Responsibility (EPR) starts to shift thinking and emphasis on to producers, and should ultimately lead to product design changes, this policy continues to use recycling costs and the existing recycling systems as the driving force behind it. This has been a long time in coming and still remains a few years off before calibrated modulated fees start to make an impact.

As a starting point, CIWM is calling for a new Resource Resilience Strategy (along with a higher-level Circular Economy Plan) and has chosen nine policy measures which should be priorities for inclusion in the new Strategy.

They are briefly summarised below, and set out in more detail in Annex 2 of Part Two:



➤ CIWM is therefore calling for Government to commit to a new strategy – a Resource Resilience Strategy – which continues to drive forward the best elements of the existing R&WS, but integrates further policy asks into an updated narrative reflecting the key strategic and political drivers of action in this area in 2024 and beyond.



Objectives of a new Resource Resilience Strategy

If a new Strategy is to drive the right policies and actions, it will need to have the right objectives. In CIWM's view, these objectives need to be stated clearly upfront and everything that follows should link back to them, to ensure that there is clarity of focus.

In 2024, there are two high priority objectives for action in our area:

Objective 1



Delivering a circular economy; and

Objective 2

Ensuring our sector plays a full part in helping the UK achieve net zero



Objective 1: delivering a circular economy

The objective of delivering a circular economy has nominally been the focus of UK government policy for at least the last five years. However, in practice, there has been very little attention paid – in England, at least – to achieving genuine circularity, and most policy measures have been focused on the more traditional issue of improving recycling rates. As is clear from Defra's own statistics, these efforts have failed, with household waste recycling rates having broadly flatlined since 2010. Indeed, as per the January 2024 statistics report, recycling rates are now falling slightly⁵.

The fact that most of those target dates have been missed and/or there has been no feedback on how things have progressed versus the strategy, tells its own story. Looking at that timeline, there's very little in the R&WS that really gets to the heart of what is needed to enable a circular economy. It is also concerning that key targets such as the interim residual waste reduction targets set for 2028 get very little mention in policy circles. If this was a target with some teeth, it could really drive progress around a circular economy. EPR is driving circular economy innovation around packaging, but nothing more.



CIWM believes that a new Resource Resilience Strategy should include an explicit objective to deliver a **genuine** circular economy, preferably by a set deadline (e.g. 2040). In terms of advancing the circular economy, the Resources and Waste Strategy has not had a lot of impact. Whilst in Wales and Scotland there have been dedicated funds linked to enabling circular economy initiatives, no such funding exists in England. Other 'drivers' have been more influential, e.g. wider R&D supported by the likes of Innovate UK and the circular economy

hubs that have been set up. As materials and businesses do not stop at borders, initiatives in neighbouring devolved nations have inevitably had a 'ripple' effect, prompting businesses across the UK (and stretching beyond) to explore circular economy business models, etc. No attempt was made to develop an indicator of circularity, to help understand if the UK economy is getting more circular or not. A Strategy that has achieving a circular economy as one of its objectives will need to address these points.

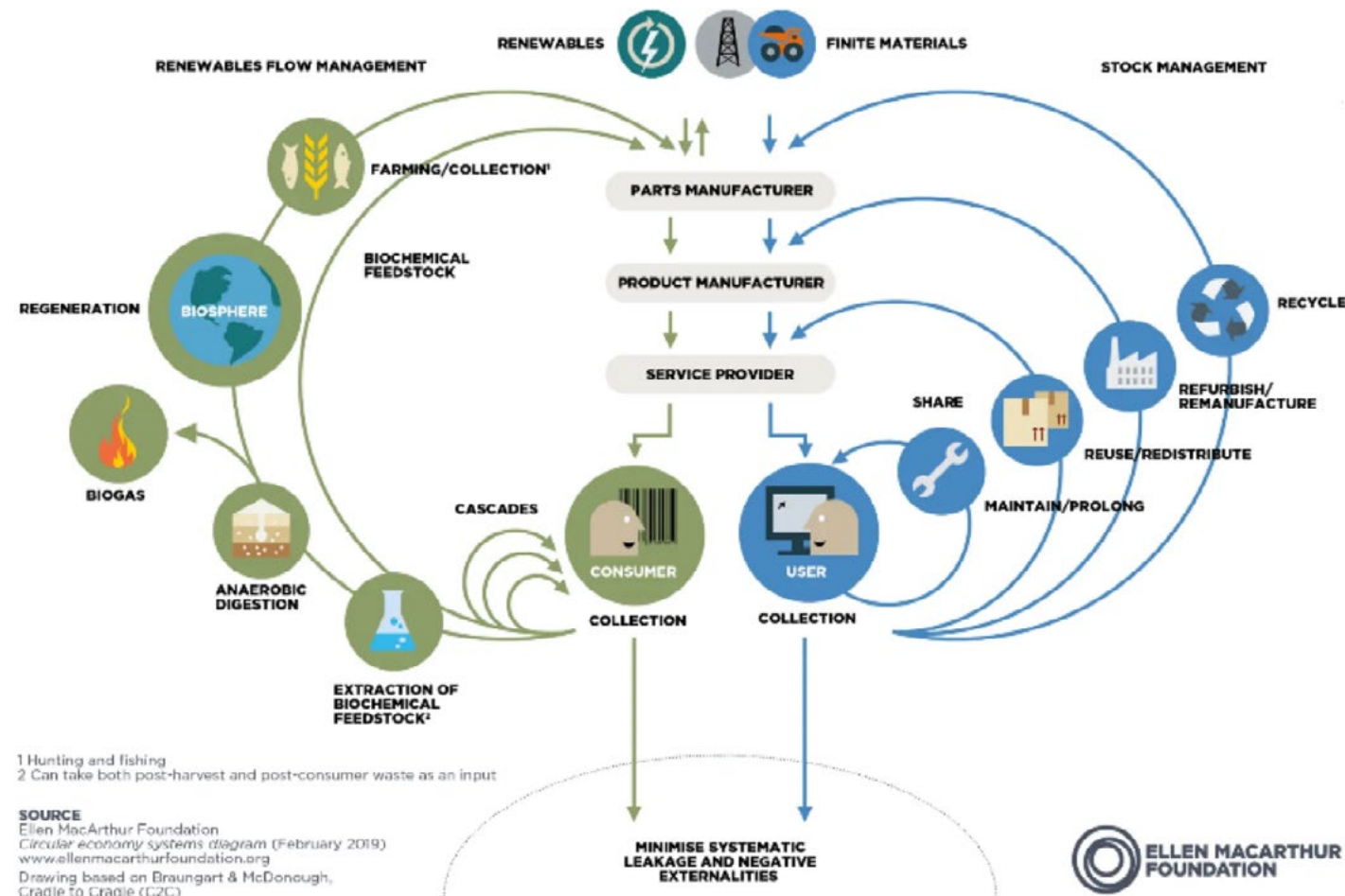


According to the **Ellen MacArthur Foundation (EMF)**⁶, "The circular economy is a system where materials never become waste and nature is regenerated. In a circular economy, products and materials are kept in circulation through processes like maintenance, reuse, refurbishment, remanufacture, recycling, and composting. The circular economy tackles climate change and other global challenges, like biodiversity loss, waste, and pollution, by decoupling economic activity from the consumption of finite resources."





The EMF have produced a helpful ‘butterfly diagram’ for visualising what is involved in implementing a circular economy⁷. This is reproduced below.



➤ As can be seen from the definition and diagram, delivering a genuine circular economy goes way beyond recycling, and requires an entirely different approach to the previous paradigms of “waste management” and “resource efficiency”. However, the delivery of a circular economy also promises to generate substantial economic and social, as well as environmental, benefits. These include job creation and economic growth, both of which will appeal to political decision-makers.



Objective 2: helping the UK achieve net zero

There is broad agreement that climate change is one of the most serious environmental threats facing humanity at present. For example, in October 2023, shortly before the COP28 climate conference, a coalition of climate scientists declared that “climate change poses an existential threat to life on Earth”⁸.

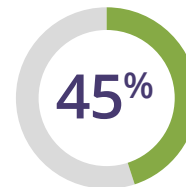
For the last 20 years, up until the last 12 months, the UK has played a leadership role globally on the issue of climate change, having been the first major economy to put a target of achieving net zero by 2050 into domestic legislation in June 2019⁹.

Our use of resources, and the different ways in which we deal with the waste that results, requires energy, generates greenhouse gas (GHG) emissions, and contributes to climate change.

➤ CIWM therefore believes that the second main objective of the new Resource Resilience Strategy should be to ensure that our sector plays a full part in helping the UK achieve net zero.



Indeed, according to WRAP, “With **45% of GHGs** arising from what we make, sell, and use... the circular economy is crucial in addressing the climate crisis”¹⁰.



Other strategic issues to consider in the new Resources Resilience Strategy

Prioritising eco-design, waste prevention and reuse

If the new Resources Resilience Strategy is to drive progress towards a genuine circular economy, it will need to include a particular focus on promoting those aspects of circularity that have received insufficient attention to date. Three early priorities here are eco-design, waste prevention and reuse, which are key approaches to building circularity into products and services from the beginning. A new Resources Resilience Strategy needs to integrate eco-design, waste prevention and reuse from the start, reflecting their importance at the top of the waste hierarchy.

To achieve this focus, CIWM recommends that the issues of eco-design, waste prevention and reuse should be prioritised in the new Resources Resilience Strategy – for example, by forming the first substantive chapter of the new Strategy, or, if the document is structured in a different way, by being the first sub-section in each chapter, so that every chapter focuses first on these issues, before moving on to other topics, such as recycling.

In a truly circular economy, products and materials are kept in use throughout their product lifecycle and waste is eliminated. Systems built with an emphasis on reuse, repair, refurbishing, and (when a product can no longer be of use) recycling are necessary for such an approach to work. That entails altering both the products we make and the processes by which we produce them. It may entail using modular design¹¹, utilising renewable materials, making repairs and disassembly simpler, and creating new products with backward compatibility in mind to extend the useful life of components. Such as shifting from an emphasis on fast fashion and from textile blends that can't be separated towards natural fibres or blends that lend themselves to be cycled.





Priority waste streams

Although the new Resources Resilience Strategy should be applicable to all major resources and all major waste streams, some may deserve additional focus. CIWM believes that the following three waste streams are deserving of this additional attention:



FOOD: (not food waste, but food):

Food production and consumption are responsible for around 30% of global carbon emissions¹², so if the new Strategy is to contribute to achieving the UK's net zero target, it needs to prioritise food. WRAP does good work in this area, but it is now clear that a solely voluntary approach to the prevention of food waste, from food production, is not sufficient. Mandatory food waste reporting by businesses should be introduced as an early priority, with regulatory requirements to follow.



TEXTILES:

The clothing and textiles sector is carbon and water intensive, and the growth of fast fashion is leading to increasing volumes of textile waste. As with food, WRAP is doing good work, but the voluntary approach has proved insufficient. The 2018 R&WS promised a consultation on introducing EPR for textiles by the end of 2022, but this was cancelled in 2023. This policy should be reintroduced and implemented.



PLASTIC:

Plastics are increasingly ubiquitous, but they are largely manufactured from fossil fuels and create ever larger volumes of waste, including microplastics, whose negative impacts on human and animal health are only starting to be understood. Given that a Global Treaty on Plastic Pollution is currently under negotiation at the United Nations, the UK's piecemeal approach to tackling plastic is unlikely to prove sufficient. A much more ambitious and holistic approach is needed.



Support and funding

More support for businesses is needed if we are to embed true circularity. There should be grander ambitions to develop further hubs for circular innovation, that facilitate more collaboration across the value chain and across industries. Fundamentally, we need a new approach to goods and services.

There needs to be more funding to local government to effect behaviour change and influence consumption attitudes. This need to go beyond the potential funds that packaging EPR is intended to provide for national and local communications. Incentivising repair will require changes in consumer mindsets, manufacturing approaches and incentives from governments. Increasing circular expertise and skills and making it easier for the general public to 'do the right thing'.

Regulatory barriers

Regulatory revisions or conflicting regulations can create uncertainty for businesses and investors. When the regulatory landscape is unclear, it becomes difficult to plan and invest in circular economy initiatives.

Legislation that hinders the use of 'circular materials' in production processes is one of the biggest barriers. The rationale behind such legislation is frequently motivated by aspects of health and consumer protection and often undermines opportunities and benefits of circular approaches.

There is currently a lack of legislation setting parameters around reuse and repair in product design. The plastics packaging tax shows that setting minimum levels can bring about change in product design and use of secondary resources and materials.

Emissions Trading Scheme

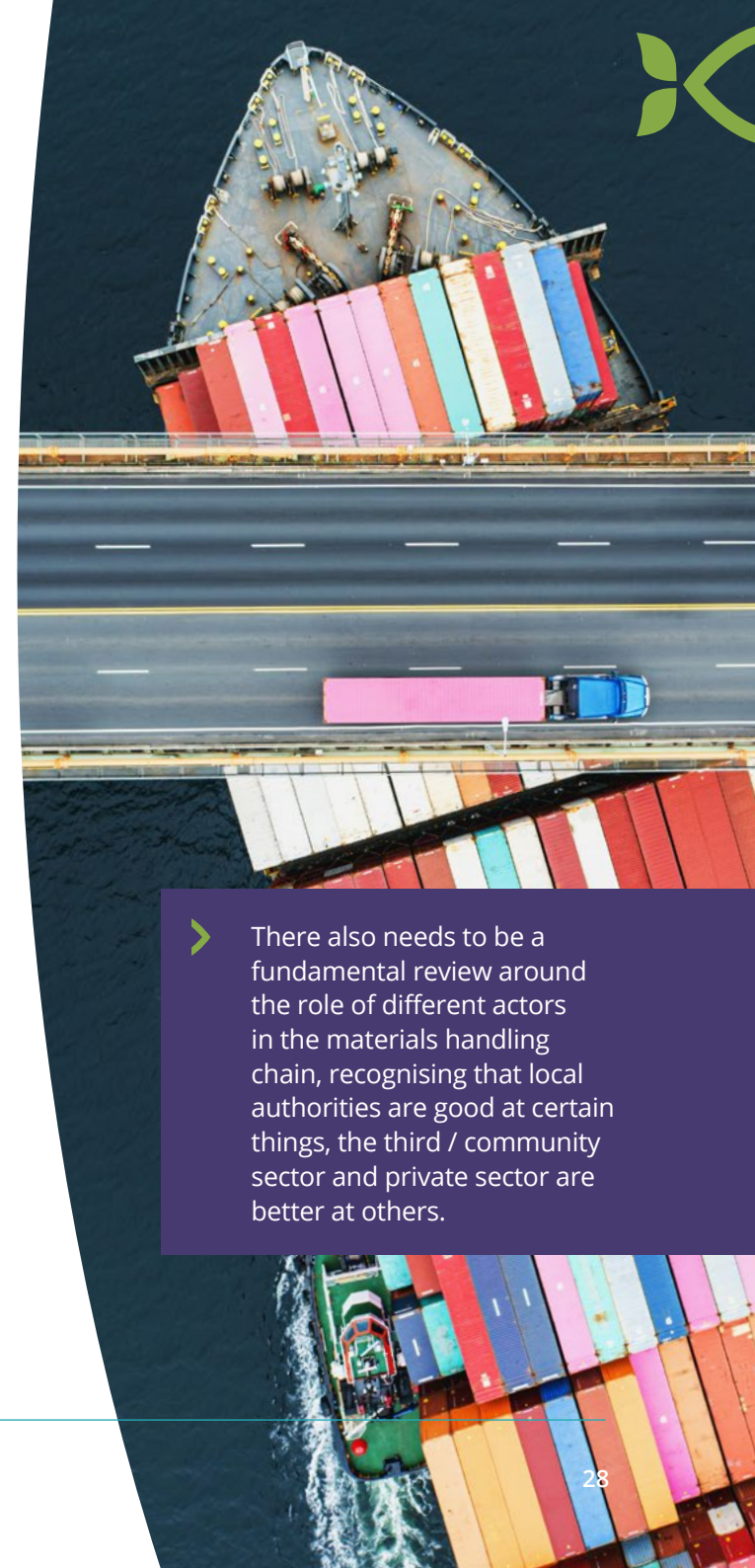
The move to include Energy from Waste (EfW) in the Emissions Trading Scheme (ETS) could have the kind of transformative impact on the way we deal with residual waste as the landfill tax did in driving the sector away from landfills to the use of modern EfW plants. It is also likely to bring additional costs onto local authorities at the same time as they look to implement changes brought about by EPR and simpler recycling. It is unclear if ETS is complimentary, separate or contradictory to these policies.

There is also the Carbon Border Adjustment Mechanism (CBAM) to consider as the previous government indicated that it would be implemented in 2027.

There is recognition that tradable allowances may not always be the best way to drive investment. Modelling may conclude that they are the lowest cost way of driving change, but when investment decisions need to be taken over ten, twenty or more years, they do not give as much confidence as a guaranteed payment over a substantial time period.

A clear line on how ETS costs will be managed is important. At present it appears that in contract terms these costs will be a Qualifying Change in Law, so local authorities will have to pay through their contracts, despite having no control about the nature of wastes arising in their areas.





What was missing, and needs to be included

Although the 2018 Resources & Waste Strategy represented a significant advance on previous strategies, there were still several issues that were not tackled. Some were important issues at the time, but were not priorities for Defra, while others have come to prominence more recently. In both cases, CIWM believes that the successor to the R&WS should include them.

What should be included next time:



There should be a move to get to the heart of what is needed to drive better product stewardship, e.g. widespread carbon taxation, relaxation of VAT on reuse, more work on product standardisation.



Better alignment with other policies / strategies, e.g. industrial strategy, development of clean-tech, building domestic supply chain resilience, alignment with Advertising Standards Association position on green claims, etc.



Focus on consumption not production, not just counting domestic raw material usage and climate emissions, but incorporating those associated with our imports of products and services from abroad, to be used by UK consumers. This urgently needs to change if we are to get an accurate view of the actual impact of the UK on global resource use and circularity.

> There also needs to be a fundamental review around the role of different actors in the materials handling chain, recognising that local authorities are good at certain things, the third / community sector and private sector are better at others.



ANNEX 1

PART ONE

> Implementation review of the Resources and Waste Strategy

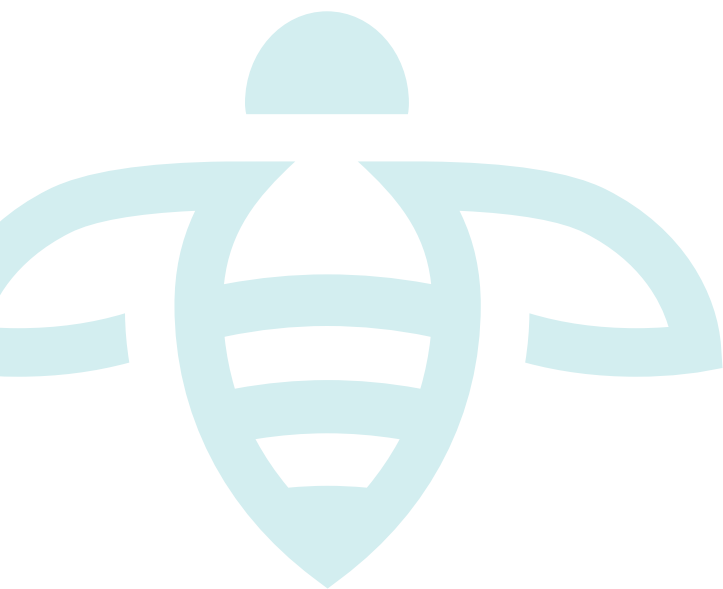
This annex lists the policy measures proposed in the 2018 Resources & Waste Strategy for England, and indicates for each whether, by the end of 2023, it had been fully implemented, partially implemented, or not implemented. It provides the data that underpins Part 2 of the paper.



1A: Five strategic ambitions of the R&WS

These are listed in the graphic on p.13, and the list on p.17, of the R&WS.

- Double resource productivity by 2050: Red. No measures taken to implement.
- Eliminate avoidable waste of all kinds by 2050: Red. Very few measures.
- Eliminate avoidable plastic waste by 2042: Amber. Some measures.
- Work towards eliminating FW to landfill by 2030: Amber. WRAP work.
- Work towards all plastic packaging being recyclable etc. by 2025: Amber. UK Plastics Pact.



1B: Major policies

POLICY	REF	STATUS	NOTES
Plastic packaging tax	p41	●	Treasury was lead department – has been increased since initial introduction. Appears to be driving change in packaging
EPR - packaging	p31-35	●	Late, reduced in scope (e.g. business packaging) and still unclear whether it will work
EPR – other streams	P38-39	●	No progress – work focused on packaging under Thérèse Coffey
DRS	P60-61	●	Late. Scottish scheme collapsed and latest indication is no scheme UK wide until 2027 – has created problem of credibility with stakeholders
Consistent collections	P68-70	●	Late, and the Simpler Recycling proposals are weaker and unlikely to solve the problems. In particular, consistency for business collections was crucial to reaching 65% recycling by 2035, yet the latest proposals are very weak on business consistency
Weekly food waste	p70-73	●	Late, and the proposals in the Simpler Recycling package are weaker than originally planned



1C: Other policies

POLICY	REF	STATUS	NOTES
Greening Gov Committees	p64-65	●	In operation with some strong targets in place: www.gov.uk/government/publications/greening-government-commitments-2021-to-2025/greening-government-commitments-2021-to-2025
Bans	p54	●	Some piecemeal bans have happened, but not on anything important
Taxes	p52	●	Doubled to 10p and extended to all shops, but there's no enforcement leading to instances of small shops that continue to give out free carrier bags
Coffee cup recycling	P61	●	Action by industry but no mandatory collections in place yet
Eco-design	p40	●	Legislated for through Part 3 of the Environment Act 2021, but no further progress
Management of chemicals	p46	●	UK Chemicals Strategy due 2023, signed up to Global Framework on Chemicals. Impact of Stockholm Convention for POPs high for the sector
Improving reuse at HWRCs	p56	●	LAs making progress but it is not driven by the strategy or a resultant action plan
Other ways of encouraging reuse	p57-59	●	Limited action seen in this area
Research and innovation projects	p122-132	●	Some projects have been funded (e.g. WRAP, UKRI). Their real-world impact is so far unclear
ONS national materials datahub	p143	●	Behind schedule
Work on monitoring and evaluation	p133-144	●	Lots of activity, but has any of it had any impact? E.g. we have no indicator for circularity yet
Development of RE clusters	p44	●	Case study research by WRAP in 2019 https://www.wrap.ngo/sites/default/files/2020-08/WRAP-Clusters-research-report%20.pdf
RE construction	p45-46	●	Green Construction Board task group on waste and sustainability take consideration of reuse, material efficiency
Extended warranties	p55	●	Not aware of any action
Green public procurement	p63-65	●	Green paper published in 2020 but no further actions taken or plans in place https://www.gov.uk/government/consultations/green-paper-transforming-public-procurement
Improving EfW efficiency	p77	●	32 operational plants with R1 status https://wiki.monksleigh.com/R1_Recovery_Facility
International leadership	P110-121	●	EU exit has reduced our international influence. CCOA fell apart during COVID. GPAP hasn't done much. UK aid money has been cut from 0.7% of GNP, stopping projects
Promote resource productivity	p130-131	●	No substantive action since the Industrial Strategy was abandoned



1D: Food waste policies (other than weekly collections p98-109)

POLICY	REF	STATUS	NOTES
Publish new food waste hierarchy	p103-104	●	Achieved
Appoint a food waste champion	p103	●	Achieved
Food labelling	p107	●	Achieved, although impact is unclear
Plastic free isles	107-108	●	Some instances, but take up very low level
£15 food waste reduction fund	p100-102	●	Impact unclear
Support WRAP Courtauld 2025	p104	●	Now Courtauld 2030, impact unclear
Food waste reporting by business	p103	●	Consultation undertaken but remains voluntary despite support for mandatory reporting in the consultation responses
Supporting WRAPs food waste reduction strategy	p108-109	●	Food Waste Reduction Roadmap, progress report for 2023

1D: Waste crime policies (p84-97)

POLICY	STATUS	NOTES
Strengthen intelligence gathering	●	
Create a Joint Unit for Waste Crime	●	EA have also introduced its new Economic Crime Unit which is all about tackling money laundering
Increase awareness of waste regulations and publicise positive work of enforcement bodies as they tackle waste crime	●	
Improve the transportation, management and description of waste by reforming existing regulations	●	
Prevent illegal activity being hidden through waste exemptions by reforming the existing regime	●	Consultation was undertaken but has not yet been implemented, date moved to autumn 2024
Mandate the digital recording of waste movements	●	Consultation undertaken but long delay in response to this being issued by Government
Tougher penalties for waste criminals	●	



ANNEX 2

PART TWO

> Policy asks

The following nine policy asks of the UK government have been developed by CIWM members to help move the UK to a resource resilient country, to facilitate a shift to a circular economy, and ultimately to mitigate climate change. They should be incorporated into a new Resource Resilience Strategy. They are split into policies needed in the first two years of the next Parliament and policies to be delivered in years three to five.



Years one and two

● **Policy 1: Implement the existing Resources & Waste Strategy policies**

As a matter of priority, the key policies contained in the Strategy but currently part way through implementation should be fully implemented. In particular, EPR, consistent collections in England (now known as Simpler Recycling) and digital waste tracking. We would welcome DRS for packaging being held in reserve until the impacts of the other reforms are determined. However, DRS or similar on batteries would be most welcome as this would help address one of the biggest risks in our sector right now: fires.

● **Policy 2: Create a cross-government resource resilience task force**

The next Government must take a serious cross cutting approach to resource resilience, net zero and climate change. By building a resource resilient UK, we can move more quickly to a circular economy, which in turn plays a huge role in climate mitigation.

With responsibilities currently spread across multiple government departments, a task force is needed to bring urgency and focus to facilitate the joint working needed to take forward critical policies to bring about the circular economy. This should bring together Defra, DESNZ, DHLUC, DSIT and DBT as a minimum.

Keeping resources in economic use is at the heart of the circular economy and the resources and waste sector is the catalytic nucleus to doing that.

● **Policy 3: Focus on Green Skills**

The next Government should support CIWM and other professional and industry bodies in championing the green credentials of our sector and encourage people to seek a career in it. There should be a Green Skills Fund created to pump prime the transition to a greener and more circular sector that not only the resources and waste sector could access but also other heavy carbon and rapidly decarbonising sectors.

There should be adoption of the recommendations of the Skills Commission's Skills 2030 report, with a particular focus on using the full Apprenticeship Levy, diversifying its use across a broader range of training and qualifications, and increasing access to lifelong learning through high-quality funded provision that meets the needs of employers and provides wider societal benefits.

Most importantly, the Government must release the draft Green Jobs Delivery Plan and extend the tenure of the Green Jobs Delivery Group to help fashion a compelling cross sectoral campaign to attract investment into sector training, careers mapping and careers advisory education support.

● **Policy 4: Introduce targeted Extended Producer Responsibility (EPR) for several key product types**

With EPR for packaging underway, attention needs to be focussed on other products where end of life management can be challenging, and producers should be held accountable for the subsequent net costs of turning these products back into resources. We propose Waste Electrical and Electronic Equipment (WEEE), batteries, textiles, and mattresses a good starting point. In each case, producers should face modulated fees which are lower for more circular products or services, and higher for more linear products and services, to drive product innovation and resource resilience.



- **Policy 5: Introduce targets across the top half of the waste hierarchy**

Introduce new targets across the top half of the waste hierarchy, i.e., for prevention, re-use, and repair. These should start as UK Government targets, but should subsequently be devolved down to business, the public sector, and households. They should start at an achievable level, but increase over time, to drive innovation and improvement.

- **Policy 6: Regulating for the new reality**

Strong regulators are key, and drive standards and professionalism, but they are currently under funded and asked to enforce regulations that are out of step with current thinking. We are still regulating 'waste' when we need to be facilitating the capture and use of 'resources'.

There needs to be an injection of funding and resources into the Environment Agency, and other regulators, alongside a wholesale change in how we determine the 'end of waste'¹³ and we need to stop defining resources as waste.

Years three to five

- **Policy 7: Price raw materials so that prices include negative environmental externalities**

This policy would ultimately aim to reduce the use of resources, and particularly those that create the most damaging environmental impacts across a product's lifetime. The recent introduction by the EU of a Carbon Border Adjustment Mechanism could provide a useful starting point.

- **Policy 8: Introduce targeted economic instruments**

Consideration should be given to introducing further economic instruments (similar to the introduction of the Plastic Packaging Tax in 2022) to drive focus and activity away from the bottom of the waste hierarchy and towards more sustainable circular activities and processes.

For example, targeted subsidies should be introduced to encourage the creation or development of 'circular' products, paid for by taxes on 'linear' products.

CIWM would welcome the accurate inclusion of externalities in the costing of products and services (not just carbon) to drive new business models that are focused on refill, repair and reuse, as well as encouraging alternative consumption patterns like leasing and sharing.

- **Policy 9: Strengthen eco-design and waste prevention**

Introduce stronger drivers for product eco-design and waste prevention, including a right to repair. The ideas underpinning the latest revisions to the EU Eco-design Directive could provide a template for this.

CIWM would like to see the production of a new and much stronger Waste Prevention Programme for England by the end of 2025. CIWM would encourage the devolved governments to do the same and would like them to be mandatory. They should contain key actions and targets for the relevant sectors of the UK economy and openly consider how we curb over consumption of resources.



Thanks to Patrick Mahon in assisting, along with the Task and Finish group of CIWM members.



> SOURCES

- ¹ Review up to 30 April 2024
- ² ‘Government’s programme of waste reforms’, Committee of Public Accounts, HC 333, 1 December 2023. Available at <https://publications.parliament.uk/pa/cm5804/cmselect/cmpublicacc/333/summary.html>
- ³ ‘Progress in improving the natural environment in England 2022/2023’, OEP, 18 January 2024, Chapter 6. www.theoep.org.uk/report/government-remains-largely-track-meet-its-environmental-ambitions-finds-oep-annual-progress
- ⁴ Review up to 30 April 2024
- ⁵ www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results
- ⁶ www.ellenmacarthurfoundation.org/topics/circular-economy-introduction/overview
- ⁷ www.ellenmacarthurfoundation.org/circular-economy-diagram
- ⁸ <https://phys.org/news/2023-10-life-earth-existential-threat-climate.html>
- ⁹ www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law
- ¹⁰ <https://wrap.org.uk/blog/2023/11/circular-economy-prejudiced>
- ¹¹ https://www.circularonline.co.uk/wp-content/uploads/2024/06/Root_CIWM_PresidentialReport_Final-Issued_v4.pdf
- ¹² IPCC (2019), Special report on climate change and land, Chapter 5, Food security. www.ipcc.ch/srccl/chapter/chapter-5/
- ¹³ <https://www.circularonline.co.uk/wp-content/uploads/2022/06/Presidents-Report-on-the-Regulation-of-Circular-materials-vFINAL-v3.pdf>



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