



We need to make more of the reuse opportunities in household recycling centres, says **Andrea Pellegram**, as she looks at the issues that were raised at CIWM's recent Rethinking Reuse conference

The waste prevention programme for England was published at the end of 2013, aiming to encourage a more sustainable approach to the use of materials and management of waste throughout society. CIWM has recently published its research findings on the circular economy; there is clearly a will to reuse more... but there is also a great deal of uncertainty about how to do this in practice.

There is a thriving reuse sector in the UK already: the charitable and voluntary sector has been taking donations from homes and businesses for decades and there is an excellent track record of keeping goods in circulation in the wider economy. Donated materials are, of course, not "waste".

Household waste recycling centres (HWRCS) are full of reusable materials. However, unlike donated materials, they are

"...the impact of the Social Value Act is disappointing. Though it was widely welcomed upon its introduction, it has proven to be a 'toothless tiger' because there is no requirement other than to consider the social value of a contract"

"waste" and, as such, they are subject to regulation and red tape under the duty of care. There is therefore little progress made in the waste management industry to protect the value of these materials. More likely than not, reusable items in HWRCS are recycled and, in this process, rendered almost valueless.

The Rethinking Reuse conference, which took place at the end of last year, discussed the issues around reusing more material from HWRCS, and both delegates and conference speakers put forward a number of views that could help decision-makers to help us all to reuse more.

Definition of Waste

THE DEFINITION of waste was widely perceived to be a barrier to reuse. It is too strategic and its reliance on the intent of the owner to discard is unhelpful because this does not address the intrinsic usefulness of the item itself. Greater clarity in the definition, moving away from intent to discard and towards a consideration of the utility, benefit and reusability of the materials themselves is called for. Reusable items should never be designated as "waste" and the definition, or guidance applied to the definition, should facilitate an item's movement from one owner to the next outside the waste stream.

There is a poor understanding amongst the general public that much of what is reused through Ebay, or "skip diving" (the practice of taking items discarded in skips and giving them a second life via reuse or selling them on) is actually currently contrary to the waste regulations. According to the regulations, Ebay sellers should be issuing waste transfer notes! People who are trying to do the right thing may actually be doing the opposite in terms of the word of the regulations, though not necessarily the intent of the waste hierarchy. This is clearly nonsense. We need to maintain environmental protection, but the definition of "waste" should relate more closely to the risks.

The definition of waste relies on "intent", which is difficult for a regulator. The Environment Agency (EA) can do more to boost the circular economy and is eager to enter into a discussion about this. Regulators must rely upon interpretation to avoid unforeseen implications. They require a clear and published approach to enforcement. There is a continued need for regulation because there remain individuals who seek to take advantage of the

system, but our industry must find better ways to manage risk whilst facilitating the growth of the circular economy.

Guidance from the EA that sets out when reusable material is either exempt from regulation, or is exempt from the definition of waste, is required. This would provide a level playing field between reusable materials, recovered from HWRCs, and donated materials – neither would be subject to duty of care and the costs that imposes.

Local Government Commissioning

ESTABLISHMENT OF a successful HWRC reuse scheme is a slow and costly process that will struggle, whilst the better established (and therefore more reliable and cost-effective) recycling alternative is available. There is a requirement for local authorities and waste producers to consider the waste hierarchy, but no means of enforcing that they take steps to move waste from recycling to reuse.

Local government, as the major commissioner of new waste management services and methods, has a key role to play in incentivising the market to create new reuse schemes. Local government contracts are generally long-term and of sufficient scale that reuse schemes can have the certainty they need to start up.

The Social Value Act should enable local government to use its procurement powers to create schemes that might not be the most profitable, but which do deliver social benefit. Local government procurement should meaningfully consider how contracts might improve the economic, social and environmental well-being of the relevant area. The focus should not only be on cost, the conference speakers and delegates concluded.

In this context, the impact of the Social Value Act is disappointing. Though it was widely welcomed upon its introduction, it has proven to be a "toothless tiger" because there is no requirement other than to consider the social value of a contract. To be successful, more demanding and enforced targets are required. Experience from Leicestershire and Wiltshire, to name but two, showed that whilst local government waste tenders included requirements to show how social value would be added, the overall scoring of tenders on this area was relatively minor. Across the country, local authority procurement policies were much more heavily weighted towards financial outcomes than social or environmental ones.

Delegates commented that it is a common experience that waste tenders are designed and managed by the procurement departments that are concerned with value for money, but have a poor understanding or appreciation of other



The panel, chaired by Nigel Mattravers and featuring Dan Rogerson MP, and delegates at the conference discuss the issues surrounding reuse

council objectives, such as the waste hierarchy, job creation and support for residents on low income and environmental management. Other benefits, such as volunteering and work experience, may also be absent from procurement objectives and they have no direct locus in local government service delivery.

With continuing budget cuts, there is a danger of entrenchment in traditional procurement methods and objectives, and a focus on individual departmental budgets, rather than a cross-discipline approach to overall value and benefit. This is a major impediment to the growth of reuse partnerships that target HWRCs.

Targets

A KEY element to the growth in recycling has been government targets, which have been applied with penalties for failure and benefits for achievement. At present, the only targets for reuse are subsumed within the recycling targets. This important incentivising tool is therefore unavailable to encourage the development of reuse schemes. The 2020 50 percent recycling target in the Revised Waste Framework Directive should be refined so that it addresses (separately) the need to increase recycling, composting and reuse as a percentage of total household waste. Until this happens local authorities are strongly incentivised to move into higher echelons. ■

The conference produced a wide range of potential solutions to the issues discussed in this article, and Andrea will address these in the next issue. Andrea's full report on the conference is available at <http://bit.ly/1FS0rA4>



The Author

Andrea Pellegram is an independent consultant specialising in waste management, community development and engagement, business improvement and town planning. She is a member of the CIWM special interest group on reuse and has worked in the private sector, for Hills Waste Solutions, and in the public sector as director of development services for Cotswold District Council, amongst others.