

Title: Review of Waste Policies Lead department or agency: Defra Other departments or agencies:	Impact Assessment (IA)
	IA No: DEFRA1332
	Date: 01/04/2011
	Stage: Development/Options
	Source of intervention: Domestic
	Type of measure: Other
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Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

As a country, England has made real progress over the last 10 years in how it treats its waste. Waste going to landfill has nearly halved since 2000 while household recycling has almost quadrupled over a similar period. However, there is still much more we could do and the Government is committed to going further and faster on waste, wanting to pursue new approaches to waste and delivery, wanting to work towards a 'zero waste economy'. At the same time the Government recognises that the economic climate has changed, and everyone needs to do more with less. The Review is necessary to review our progress on waste to date and refocus our current and future activities and ambitions in line with these new priorities.

What are the policy objectives and the intended effects?

The objectives of the Review of Waste Policies are to ensure that the right policies are in place to set a path 'towards a zero waste economy' and to set waste goals for 2014 and 2020 – two of the key actions in Defra's business plan. The intention of the Review is to take forward the Government's priorities for waste management and delivery more generally – these are to: undertake sustainable waste management, including waste prevention, to help protect the environment and preserve natural resources; contribute to tackling climate change; decentralise more decision making powers to local communities; ensure that the economic contribution of the waste management industry to the economy is maximised; and help tackle the fiscal deficit.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

The Waste Review proposes a wide range of actions. By and large the proposals put forward in the Review are either non-regulatory, de-regulatory or voluntary in nature. The Review has adhered to the Government's belief that it should only intervene through regulation where absolutely necessary, and where market failures or barriers are identified, act as a facilitator. By the very nature of the Review process, some of the proposals put forward are not yet sufficiently developed to allow an Impact Assessment to be prepared (although they will require an Impact Assessment at a later stage). These individual Impact Assessments will consider, in the necessary depth, the possible policy options. This Impact Assessment will provide an overview of the range of proposals put forward by the Waste Review, outlining where some policies are more developed than others and seeking to provide a broad assessment of the Review's proposals as a whole.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** Month/Year

What is the basis for this review? Not applicable. **If applicable, set sunset clause date:** Month/Year

Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?

Not applicable

SELECT SIGNATORY Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

Date:

Summary: Analysis and Evidence

Policy Option 1

Description:

Review of Waste Policies

Price Base Year	PV Base Year	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate:

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate			

Description and scale of key monetised costs by 'main affected groups'

Due to the differing stages of policy development of the proposals put forward in the Waste Review, producing an aggregate figure of all the known costs would not produce a meaningful picture of the total costs of the Review, especially as a number of the proposals are insufficiently developed for any costs to be estimated at this stage. However, where proposals require an Impact Assessment or a similar cost benefit analysis then detailed costs will be developed in due course.

Other key non-monetised costs by 'main affected groups'

There are no significant non-monetised costs envisaged on the main affected groups: households, businesses, and local authorities, although it is anticipated that many of the proposals put forward in the Review will ultimately lead to behaviour change by the main affected groups, so that more waste prevention activities occur, more material is reused and recycling, and less waste is sent to landfill.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate			

Description and scale of key monetised benefits by 'main affected groups'

As with costs, due to varying stages of policy development, an aggregate of the monetised benefits would not produce an accurate picture of the total benefits of the Waste Review. Benefits for individual policies will be calculated where separate Impact Assessments or similar analyses are required.

Other key non-monetised benefits by 'main affected groups'

Householders should find it easier to 'do the right thing' either at home or on the go, with recycling and waste prevention coming embedded behaviours. Businesses, especially SMEs should also find it easier to access good waste and recycling collection services as well as developing new models for producing less waste and introducing new services. Local authorities should have fewer burdens and more information and support from Government on delivering new services in line with best practice.

Key assumptions/sensitivities/risks

N/A

Discount rate (%)

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs:	Benefits:	Net:	Yes	OUT

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	England				
From what date will the policy be implemented?	14/06/2011				
Which organisation(s) will enforce the policy?	N/A for this IA.				
What is the annual change in enforcement cost (£m)?	N/A				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	N/A				
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded:		Non-traded:		
Does the proposal have an impact on competition?	No				
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	Costs:		Benefits:		
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	Micro	< 20	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
Statutory equality duties¹ Statutory Equality Duties Impact Test guidance	No	23
Economic impacts		
Competition Competition Assessment Impact Test guidance	No	23
Small firms Small Firms Impact Test guidance	No	24
Environmental impacts		
Greenhouse gas assessment Greenhouse Gas Assessment Impact Test guidance	No	25
Wider environmental issues Wider Environmental Issues Impact Test guidance	Yes	25
Social impacts		
Health and well-being Health and Well-being Impact Test guidance	No	25
Human rights Human Rights Impact Test guidance	No	25
Justice system Justice Impact Test guidance	Yes/No	25
Rural proofing Rural Proofing Impact Test guidance	No	26
Sustainable development Sustainable Development Impact Test guidance	Yes/No	26

¹ Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

References

Include the links to relevant legislation and publications, such as public impact assessments of earlier stages (e.g. Consultation, Final, Enactment) and those of the matching IN or OUTs measures.

No.	Legislation or publication
1	Review of Waste Policies (http://www.defra.gov.uk/environment/waste/review)
2	
3	
4	

+ Add another row

Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

Annual profile of monetised costs and benefits* - (£m) constant prices

	Y ₀	Y ₁	Y ₂	Y ₃	Y ₄	Y ₅	Y ₆	Y ₇	Y ₈	Y ₉
Transition costs										
Annual recurring cost										
Total annual costs										
Transition benefits										
Annual recurring benefits										
Total annual benefits										

* For non-monetised benefits please see summary pages and main evidence base section

Evidence Base (for summary sheets)

1. This overarching Impact Assessment has been developed to provide an overview of the rationale and cumulative impacts of the proposals put forward in the Government's Review of Waste Policies. This Impact Assessment identifies where market failures provide a rationale for intervention while recognising that much of the existing legal framework we have to work with comes from Europe. The Review sets out new proposals and actions and sets the framework for future policy development – it does not commit to any actions that would increase regulatory burdens.

2. Due to the nature of the Review – charting a course for future waste activity - most policies have not been sufficiently developed to allow individual Impact Assessments to be prepared in time to accompany the Review. Instead, it sets out the case for action in specific policy areas and where sufficient work has allowed preliminary figures to be prepared, brief reference to these estimates are made in the evidence base for this overarching Impact Assessment. Where development of a policy is still at too early a stage to allow any figures to be produced then this is highlighted in the evidence base, along with a brief description of how we intend to develop any assessments required.

3. Where proposals for future policy considerations in the Review eventually result in specific policy changes they will be assessed, where required, in separate Impact Assessments.

Overview

Problem under consideration

4. The resources we use are finite. Even renewable resources can only be replaced at a certain rate. However, as the economy grows, even under current economic conditions, consumption levels of many of our resources will increase, with inevitable environmental and economic implications. Despite consuming increasing quantities of material, we are still producing around 340 million tonnes of waste every year¹. While some of this material is recycled or reused, and although there have been marked improvements in this area, a significant quantity of it still ends up being sent to landfill. Reducing the amount of waste we produce and ensuring that all material resources are fully valued, both financially and environmentally, are central to the Government's ambition to move towards a "Zero Waste Economy". Moving towards a Zero Waste Economy, where material resources are re-used, recycled or recovered wherever possible, and only disposed of in landfill as the option of the last resort, will help ensure that we use and manage our natural resources in a sustainable way, to meet not only our current needs but the needs of future generations.

5. To ensure that our policies and mechanisms for delivering them are fit for this purpose, and to assist the Government to achieve its ambition to be the greenest ever, while seeing more powers devolved away from central government down to local communities, the Government has undertaken a fundamental **Review of Waste Policies**.

6. The two key objectives of the Review of Waste Policies are, as set out in Defra's Business Plan for 2011 to 2015, to ensure that we have the right policies in place to set a path 'towards a zero waste economy' and to set waste goals for 2014 and 2020. The Review will also enable the implementation of the Government's priorities for waste management and delivery more generally. These include: promoting sustainable waste management, especially focusing more on waste prevention, to help protect the environment and preserve natural resources; looking to waste to do more to contribute to tackling climate change; considering how we can decentralise more decision making powers to local communities; ensuring that the economic contribution of the waste management industry to the economy is maximised; and finally using waste to help tackle the fiscal deficit.

7. The Review of Waste Policies was launched by the Secretary of State for Defra, Caroline Spelman, at the Futuresource Conference on 15 June 2010. This was followed by a range of stakeholder engagement activities and a formal Call for Evidence that ran between 29 July and 7 October 2010.

Stakeholder engagement

8. To ensure that the Review took account of all interested parties views, we have undertaken an extensive range of engagement with a wide range of individuals, businesses and organisations across England, through a Call for Evidence which received over 300 submissions, an interactive website,

¹ Sustainable Use of Resources – Review of Waste Policies

online survey and numerous events. Although we received a wide range of differing responses on waste policy in England, we consistently heard a number of common views. These included:

The need to focus on preventing waste as a priority, as a key component of broader resource efficiency;

The importance of treating waste as a resource and embedding waste policies into wider resource and material security policy;

The need to remove barriers which prevent greater integration of household and business waste policy and service delivery;

The importance of policies which continue to promote high levels of high quality recycling; and

The need to further drive waste away from landfill.

Rationale for intervention

9. England has made real progress in recent years in how we deal with our waste:

- Waste going to landfill has nearly halved since 2000, diverting over 9 million tonnes of municipal waste a year in the process;

- Household waste recycling has increased from 11.2% in 2000/01 to over 40% in 2010;

- Waste generated by businesses declined by 29% between 2002/03 and 2009. During this period, the amount of commercial and industrial waste sent to landfill has decreased by 59%.

- The average annual household waste per person has reduced by 51kg since 2006/07 to 457kg/person;

- 211 (65%) local authorities are now collecting five or more recyclables at kerbside, and 99% collect at least two; and

- 50 local authorities now provide a dedicated food waste collection service to their households.

However, it is clear that we can do more and recoup even greater benefit by reducing waste arisings, and managing the waste we produce more effectively. The production of waste has always been a by-product of economic activity, with costs and benefits involved – costs in the resources used in production and benefits gained to businesses from adding value to the resource and to consumers from the use of the goods and services. It has always been important that we seek to ensure that the maximum value is extracted from a finite amount of resources, so that we do not produce excessive amounts of waste, and where waste is produced, it is handled in such a way as to ensure the net cost to society of dealing with the waste, including the environmental cost, is minimised. However, while the market will usually drive such efficiencies, there may be market failures and other barriers that prevent this ideal situation from occurring. Further detail on the economics of waste and waste policy is provided in the underlying background economic paper for the Review of Waste Policies.

10. Environmental externalities are the primary market failure here, where decisions to produce and consume do not take full account of the environmental consequences of waste generated as a result. There are several environmental impacts associated with waste management – greenhouse gases, air quality, water, noise, groundwater, and land use. Whilst there may be specific impact categories associated with particular waste types – for example, hazardous wastes – the preponderance of waste-related environmental impacts relate to greenhouse gas (GHG) emissions. Failing to price in the environmental cost and benefit of generating waste leads to inefficient production and consumption patterns, and excess waste being produced. It is better off for society to reduce waste as long as the benefits of doing so exceed the cost.

11. In addition to incentivising a lower quantity of waste at the aggregate level, markets alone may not ensure that the right amount of waste is going to each level of the hierarchy. The waste hierarchy, as set out in the Waste Framework Directive, ranks the various waste management options broadly according to their environmental desirability, although there are exceptions. Without government intervention, waste treatment options with better environmental performance may be penalised relative to treatments with poorer performance. Accounting for the environmental impact requires that the costs of various treatment options and levels of the hierarchy fully reflect the costs to society of each option.

12. For example, government intervention such as the landfill tax raises the cost of sending waste to landfill, reflecting the environmental externality of disposing waste in this way. However, it does not reflect the relative scale of the environmental impact of treatment and disposal methods further up the hierarchy; for example, the externality associated with incineration, recycling or re-use. Although the recycling rate has risen, further intervention is required to further move waste to an efficient level amongst the various management options.

13. Other market failures and barriers to an efficient waste management system may require government intervention. Prior to local provision of collection and disposal services, local environments were spoiled by the unregulated disposal of wastes. To overcome the nature of these problems government intervention has been necessary, and local governments have set up collection and disposal systems to ensure waste is properly disposed of by households, as well as regulating to ensure businesses dispose of waste properly.

14. Other market failures and barriers to an efficient waste management system include imperfect information, imperfect competition, or other barriers to efficiency such as excess planning costs, lack of access to credit, and long payback periods. Households and businesses can make better decisions about waste if they have more information on the direct and wider impacts of their actions. Currently, businesses do not take actions relating to reducing the amount of waste that is generated despite significant potential benefits of reduction in costs. Households may not be aware of the wider benefits of waste prevention, re-use and recycling when deciding what to do about their waste.

15. A further area of concern is around the ability of the market to deliver the necessary waste infrastructure. Issues such as capital market imperfections, lags in the investment coming on-line, a combination of uncertainty and long payback periods, and planning problems mean that infrastructure development may be insufficient and require government intervention to incentivise and support the appropriate level and type of investment. Further, as in the case of renewable energy, new technologies can require additional intervention to overcome innovation market failures.

16. Waste is one of many environmental sectors, and policy actions contribute to a transition to a green economy. The policy challenge lies in addressing the market failures and other barriers to the efficient consumption and use of resources in a way minimises the cost to the economy. In the waste policy context, this requires creating the right market conditions and incentives for business and households to invest and make more efficient choices – in their use and consumption of resources and in the disposal of waste. The optimal amount of waste generated is reached when the environmental and other costs of an additional unit of waste is equal to the economic benefits provided that extra unit of waste given current patterns of production and consumption generating that waste.

17. Waste policy has achieved a significant shift up the waste hierarchy. Waste going to landfill has nearly halved since 2000, while household recycling has increased from 11.2% in 2000/01 to over 40% in 2010. The aim of the review is to ensure that the policies we have in place are the most appropriate to deal with the problems associated with the production and disposal of waste.

Quantifying the impacts of policies to influence waste up the hierarchy

The rationale for interventions related to shifting waste further up the hierarchy are based on the benefit to society of using less resources. Some of these benefits can be monetised, such as the reduction in greenhouse gas emissions. As an example, the table below shows the emissions incurred from different waste treatments of plastics.

Average plastics	Waste Prevention (avoidance excl disposal)	Open Loop Recycling (excl avoided impacts)	Landfill
Emissions in kgCO ₂ e per kg treated	3,179	714	34
net CO ₂ saved compared to landfill	3,213	2,499	0

- A tonne of average plastic incurs 3,179kgCO₂e/kg in the raw material extraction and production process. If this is sent to landfill at the end of its useful life, it causes emissions of 34kgCO₂e/kg.
- If the material was recycled, the process would incur emissions of 714kgCO₂e/kg, but lower emissions in total by 2,499kgCO₂e/kg taking into account the avoided emissions from virgin material and landfill.
- Waste prevention would save the emissions in the extraction and production process and the avoided landfill impact, lowering emissions by 3,213kgCO₂e/kg.

Source: WRAP

Using the 2011 mid price of traded carbon for the waste prevention and recycling, and the 2011 mid price of non traded carbon, the value of those avoided emissions is over £35 for recycling and over £45 for waste prevention. This is an example of the emissions for a particular material, and the impact from other materials may differ, but the ranking of the benefits by type of treatment is similar for other commonly recyclable materials.

The example above illustrates savings from waste prevention generate the most benefit in terms of avoided emissions. There are additional financial benefits from waste prevention that are not included in the above analysis. A recent report published by Defra² estimates £23bn of financial savings to businesses from improved resource efficiency. £18bn is estimated to come from waste prevention in the form using of raw materials more efficiently and generating less waste. Implementing these measures is estimated to require very little or no investment. The main barriers to realising these benefits are identified as behavioural, financial and a lack of information.

Overarching Policy objectives

18. The Waste Review makes a number of proposals that the Government intends to pursue this Parliament – either by working with others or directly through delivery partners. These interventions, or actions, are described below. In proposing this array of actions, we have adhered to some overarching principles about the role of central Government. As mentioned above, the case here for further government intervention rests where the market, with the existing climate change and waste policies etc in place, is not producing the "best" outcome and benefits justify the costs. Interventions can enable change by households and businesses in the most efficient manner possible - choosing the most appropriate policy instruments so that they can change how they treat waste in the whole chain from product design to disposal decisions. However, the Government should only be involved where really necessary - where there are market failures and barriers - and act more as a facilitator or broker, acting as a regulator only as a last resort. It is this principle that has framed the thinking behind this Review, with much of the identified change needed being done through incentivising the right behaviours, providing people with the right information to make the best choices, and seeking agreements with businesses to do the right thing.

19. The Review proposes a number of possible measures, the majority of which are non-regulatory. The proposals are intended to shift waste further up the hierarchy and ensure that the appropriate treatment of waste is achieved in the least burdensome manner whilst achieving improved environmental outcomes. The main impacts of the Review proposals are detailed in the section following the assessment of proposals. The impacts on households, businesses and Local Authorities are outlined and discussed in qualitative and quantitative terms. At this stage it is difficult to monetise all the intended impacts as many proposals are not detailed enough to accurately quantify the individual impacts and then make assumptions regarding the overlap and cumulative impacts of policy proposals.

20. The proposals can be classified according to the type of problem that government intervention is expected to address:

2

<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&ProjectID=16943&FromSearch=Y&Publisher=1&SearchText=EV0441&SortString=ProjectCode&SortOrder=Asc&Paging=10#Description>

Externalities and public goods/bads

The environmental externalities and the public good/bad issues relating to the Waste Review are set out in the rationale for intervention. The environmental externalities relating to each waste treatment method are not currently taken into account when waste arises and is disposed. The improper disposal of waste can be considered a local public bad, where local environments are spoilt by illegal dumping.

Raising awareness for better decision-making

Where government intervention improves access and availability of information for households and businesses.

Capacity and institution building

As part of the process of widening the information and support available to all participants in the chain of production processes, there is scope to help the exchange of information at the local level. By initiating this process, government can enable local communities or businesses to build on existing knowledge and accelerate shifts to improved behaviour. In other cases building frameworks to enable collective action and cost-sharing can lead to better economic outcomes, provided there are limited distortionary impacts on competition.

Developing new markets and incentives

Incentives to encourage the right behaviour can be a cost effective way of achieving policy objectives, such as giving households incentives to shift their waste treatment up the hierarchy. New markets in waste management may need government intervention to encourage innovation and growth.

Better and less regulation

Better and less regulation will help enable a smooth transition to a green economy. Achieving policy objectives using a less burdensome approach improves the cost effectiveness of any government intervention. By reducing burdens on business and encouraging innovation, intervention can lead to a more efficient waste management sector.

Behaviour change

All policy interventions have the objective of changing behaviour and it is cost effective to do so in the least burdensome manner. Achieving behaviour change that then becomes embedded in day to day actions can result in better outcomes for society without government intervention. This process can take a long time, such as embedding recycling as a norm, but policy measures, through providing better recycling facilities can help speed the transition.

Initial assessment of individual Waste Review policy proposals

Summary of key actions proposed

From Design to Disposal : A Common Approach With Business

21. The Waste Review identifies that the greatest environmental benefits and cost savings to individuals, businesses, and local authorities will be delivered by producing less waste in the first place (see “Quantifying the impacts of policies to influence waste up the hierarchy” box, pages 7 to 8 above) However, for individual businesses it can often be difficult to identify waste within their own activities – many either believe that they are already doing all that can and that taking additional action to reduce waste will be expensive, or they see the waste as inevitable and do not have the expertise to identify the opportunities. The Review concludes that waste reduction and reuse needs to be easy for businesses to understand and to do, and that there is a lot more that Government and business can do. For business, the Waste Review proposes a series of Waste Prevention actions. Firstly, the Review proposes a series of actions that aim to **provide information and support to business**. This package of proposals include:

- creating a Waste Prevention Loan Fund - this will be a pot of £1m (managed by WRAP³ and to be ultimately self financing) to provide low-cost loans to SMEs, social enterprises and Local Authorities in order to undertake waste prevention activities (as this is a spending commitment we have not produced an impact assessment for this action, however, the commitment has been subject to the necessary business case approval procedures);
- encouraging and facilitating the expansion of SME Waste minimisation networks;
- enabling continued development of Waste prevention toolkits and training courses for particular sectors;
- providing guidance on how procurement can be used to encourage waste reduction and recycling in the supply chain; and
- helping with the development of ‘pioneer projects’ to demonstrate business models for waste prevention e.g. leasing, long-term maintenance.

22. These actions are ones that we have been identified as delivering benefits for businesses and the environment. This package of measures does not involve any new regulatory burdens on business, but involves providing support and information to business. As these policies are developed, further consideration will be given, depending on the type of information or guidance ultimately deemed necessary, on whether an Impact Assessment will be required. If Impact Assessments are required they will be produced in due course. Due to the early stage of the development of these proposals, costs and benefits have not yet been estimated

23. To further address the problems identified above, the Review also proposes a number of actions to help **improve resource efficiency by working with Design, Manufacturing and Retail businesses**. This package includes:

- exploring how mandatory standards for the design of energy using products might include some requirements which deliver waste prevention;
- developing product standards supporting many voluntary environmental labelling schemes, including the EU Ecolabel;
- looking at how to address the reuse barriers associated with fire and electrical safety;
- consider how government procurement standards can impact of resource efficiency through inclusion of waste prevention requirements;
- working with businesses to provide better information on optimum lifetimes of products; and
- supporting the development of systems that provide consumer services such as repair, buy back, or take back at end of life.

³ The Waste and Resources Action Programme

24. This package entails looking at how new standards and labelling could be used to help promote waste prevention. Impact Assessments will be developed as appropriate during the development of the policy. No costs or benefits for these proposals have yet been identified. However, it is expected that there will be transitional and ongoing costs to businesses alongside the environmental benefits.

25. The Waste Review also reiterates the EU requirement for Defra to produce a **Waste Prevention Programme** for England by December 2013. This programme may entail further actions that ultimately require Impact Assessments. A list of the possible further actions a Waste Prevention Programme might entail is included in the Waste Review. However, at this very early stage the preparation of any assessment is not possible.

26. The Waste Review recognizes that there are already a range of statutory Producer Responsibility schemes but, while they all seek similar outcomes, there are significant differences between them which increase cost and complexity for regulators and regulated businesses. To address this, the Waste Review commits the Government to working with the enforcement bodies to look at whether and how **existing Producer Responsibility regimes could be simplified by moving towards a common delivery model**. It has been suggested to Defra that such action could lead to reduced administrative burdens, lower costs and reduced risk of inadvertent non-compliance for regulated businesses, especially for smaller producers that fall with the scope of more than one of the regimes. An Impact Assessment will be developed alongside this exploratory work to fully estimate the potential costs and benefits.

27. The Waste Review reaffirms the Government's belief that, in many circumstances, better environmental outcomes can be delivered in a less burdensome way through a voluntary approach. Voluntary agreements can be more effective than other government interventions under certain conditions. In particular, when private benefits outweigh private costs or where there is an explicit threat of regulation, businesses may be incentivised to participate. In such cases, improved environmental outcomes can be achieved at a lower cost for both Government and businesses. A more efficient outcome is dependent on the coverage and design of the negotiated agreement⁴. Voluntary agreements may also encourage competition between those participating in the agreement in delivering targets which may stimulate growth and innovation, improving cost effectiveness. For businesses, they can help secure corporate commitment to specific targets that are enmeshed into business strategy. The Review identifies a number of sectors where the Government is keen to agree new voluntary responsibility deals. These sectors were considered the optimal ones for agreements as they cover products and materials that have high embedded carbon and the sector characteristics are appropriate for initiating effective voluntary agreements. Preventing waste in these areas could deliver more in terms of reducing overall carbon emissions, as well as those which arise directly from landfill. New deals are being investigated/considered:

- The **Hospitality Sector**: The majority of hospitality waste is made up of food and packaging. The hospitality sector accounts for 15% of the 20m tonnes of food waste generated in the UK. We will look to agree a deal that will focus on these waste types, and could potentially cover both prevention and sustainable use of the waste that still arises (e.g. greater composting or use of anaerobic digestion for food waste, more recycling for packaging). This is a large and complex sector, and voluntary initiatives will need to be tailored to the segment under consideration. Once an agreement has reached it is our intention to produce an Impact Assessment. However, it is too early in the development of this policy to produce a full Impact Assessment.
- **Extending existing agreements on paper, including:**
 - Direct Mail**: Discussions on a new deal with the direct marketing industry have begun. The discussions are looking at how best to target direct mail to recipients who value it, through the development of an easy to use opt out process which will help to reduce the amount of unwanted direct mail produced and delivered, and therefore becoming waste. An Impact Assessment will be developed in due course alongside the agreement.
 - Magazines and Newspapers**: Discussions are at an early stage with representatives of the Newspaper and magazine industries on whether and how to develop the existing voluntary agreements. Any impact assessment needed would be developed alongside any agreement.

⁴ Analysis of voluntary agreements is expanded further in the Economics of Waste and Waste Policy paper published alongside the Review.

Paper: Additionally, we will consider whether there is scope for future agreements that could look to how the wider paper industry can reduce the waste produced, and on the life cycle impacts of the manufacturing and use of paper products. Initial findings from a Defra project looking at the flow of paper through the economy indicate there are opportunities for improving the environmental performance of other sectors of the paper industry not already covered by an existing agreement, and the Government will look to initiate discussions with these sectors in due course. Once discussions have begun, we will consider the development of an Impact Assessment.

Packaging: Packaging waste constitutes about 10% of the commercial and industrial (C&I) waste stream and about 20% of the household waste stream in the UK. The Packaging and Waste Packaging Directive (94/62/EC as amended) sets minimum recovery and recycling targets. The avoided GHG emission benefits of recycling a tonne of packaging are illustrated in the box below. The costs of collection can vary according to material, but initial analysis indicates the benefits of recycling accrue even at levels higher than the targets set by EU. Net benefits from packaging waste prevention are even higher. Therefore the Review also commits Defra to continue working with business to identify and promote innovation which can reduce packaging, increase the amount of recycled contents used, or make more packaging recyclable by design. This will be delivered through responsibility deals, which will build on existing voluntary agreements. Packaging recycling and recovery rates can play a significant role in meeting municipal landfill diversion targets, increasing the diversion of commercial waste from landfill, meeting overall recycling targets, and recovering energy from waste. The Review highlights where we are considering changing targets in this area. A separate Impact Assessment on Defra’s proposals for packaging is being produced and will be published with a public consultation planned for late Summer 2011. As this policy is still in development stage, the costs and benefits associated with options will be detailed in the Impact Assessment to accompany the consultation later this year.

Carbon Factors (CO2 equivalent)⁵

Material	Carbon factor (Tonnes of CO2 equivalent / tonne of material recycled)
Paper	1.320
Glass	0.315
Aluminium	9.000
Steel	1.280
Plastic	1.167
Wood	0.303

28. As part of the process of developing options for packaging, analysis was conducted on a model for deposit refund systems (DRS) commissioned by the Campaign for the Protection of Rural England (CPRE). A DRS system requires paying a deposit for beverage containers that is then refunded back on proper return of the container. For implementation, the modelling calculates the costs and benefits for two different scenarios, a complementary system highlighted in the main CPRE report in which only the DRS collects beverage containers and a parallel system in which the DRS works in conjunction with the existing kerbside collection system. The main difference is the lower return rate estimated at 80% for the parallel system given that a higher proportion of consumers are indifferent to the loss of deposits (15-30p depending on size) and therefore continue to dispose the containers in either kerbside boxes or as part of their residual waste. Although the framework of the model is maintained, Defra undertook analysis to assess and highlight the different underlying assumptions and estimated the system would result in a total net cost to society. The report calculates a saving of £249m to producers from implementing the DRS but this has been challenged by industry on the grounds that the estimated set up and running costs are too low. It also takes into account an environmental benefit of £1,248m from reduced littering. The value of this national reduced disamenity benefit is based on a survey conducted in Australia based on the willingness to pay for a 1% reduction in litter. This calculation does not take into account differences in scale, tastes and impact of marginal change in the amount of litter and therefore the methodology is not considered to be robust. Furthermore this disamenity benefit is not included in

⁵ Source: “Making the Most of Packaging” Annex A, Table 4

Defra's analysis in order to be consistent with the treatment of disamenity impacts for all other options. Based on this assessment, the net present value of a DRS system is -£2,128m over the 2013-2017 period. A wider range of robust evidence on the disamenity costs of all types of treatment of waste treatment is required in order to consistently appraise this specific impact.

29. The Waste Review includes a proposal **to look at the waste currently sent to landfill from the Government Estate**. This enables the Government to act as an exemplar, improving efficiency by increasing the amount of waste diverted from landfill. As the proposal will impact on central Government Departments only, an Impact Assessment is not being proposed, however, the costs and benefits of the commitment will be examined.

30. To take forward the Government's commitment to help reduce burdens on businesses, we are keen to promote the principle of reducing inspections and enforcement of businesses that are compliant to agreed standards. The Waste Review recognises that small businesses view regulations as a key constraint to growth but that regulations and enforcement against those who flout the law can also benefit business by overcoming market failure and providing a level playing field. The Review concludes that it is often compliance with the regulations that imposes the burdens and where better regulation principles have already been applied significant impacts have been made. The Review highlights the **shared statement of action**, agreed between Defra, BIS and the Environment Agency, exploring the potential for standards and accreditation to play a greater role in regulation and enforcement. As this work is intended to reduce burdens on business that demonstrate compliance to agreed standards, a full Impact Assessment will be considered in due course. At this stage, no preliminary costs or benefits have been estimated.

31. The Waste Review commits Defra to a **review of waste crime offences**; including whether the current levels of fines and sentences are sufficient deterrents, whether successful prosecutions are sufficiently visible, whether there is greater scope for incorporation of the Macrory principles of restorative justice, and how to raise awareness amongst business of their obligations. No costs or benefits for these proposals are yet available. Should the review reveal that changes are required, then the development of an Impact Assessment will be considered (depending on the changes proposed).

32. To provide local authorities and the Environment Agency with stronger powers to tackle waste crime, the Waste Review proposes to bring into force powers to allow these authorities to **seize vehicles suspected of involvement in flytipping and waste crime**. The objectives of this change would be to improve and strengthen existing powers for local authorities and the Environment Agency to seize vehicles suspected of involvement in waste crime, would facilitate investigations, disrupt illegal activity and penalise those involved. We would expect the number of vehicle seizures to increase as a result of the introduction of these powers, contributing to a fall in the amount of fly-tipped waste, which in 2009-10 cost (local authorities and the Environment Agency) nearly £46 million to clear up and a further £19.1 million on enforcement action. An individual Impact Assessment that provides more details of the rationale behind introducing these powers as well as detailed costs and benefits will be produced later this year. A brief summary of the initial estimated costs and benefits of this change are provided below.

Seizure of vehicles suspected of involvement in flytipping and waste crime – Costs and Benefits

Costs

The average annual (constant price) costs have been estimated between £0.17m and £0.50m with a best estimate of **£0.33m**. The total costs (present value) over a 20 year time period have been estimated between £2.4m and £7.06m, with a best estimate of £4.73m. Some of the key monetised costs were estimated as: an increase in costs from additional seizures mostly to local authorities £0.19m - £0.47m; an increase in legal aid costs for increased prosecutions £0.06m - £0.12m and collection costs for waste disposed legitimately £2.16m - £6.47m. It was not anticipated that any of the costs to the public sector from extra enforcement activity would be passed onto legitimate businesses.

Benefits

The average annual (constant price) benefits have been estimated between £0.72m and £2.68m with a best estimate of **£1.70m**. The total benefits (present value) over a 20 year time period have been estimated between £10.25m and £38.11m, with a best estimate of £24.18m. Some of the key monetised benefits were estimated as: carbon benefits £0.36m - £1.07m; reduced cost on current volume of seizures £0.44m - £1.10m; reduction in legal costs to the courts (reduced Magistrate and Clerk time) £0.06m - £0.16m; and savings in clear up and enforcement fees (local authorities, the Environment Agencies and private sector)

£9.39m -£35.78m. The benefits assumed a reduction in fly-tipping of 2-5%.

The best Net Benefit (Present Value(PV) estimate produce by this policy change over a time period of 20 years was £19.45m. Net benefit Estimates ranged from a low value of £7.85m to a high value of £31.05m.

Empowering Local Communities

33. The Review states that Government will be working with local councils to **increase the frequency and quality of rubbish collections** and make it easier to recycle. Taxpayers, the Review states, have a reasonable expectation that household waste collection services should be weekly, particularly for smelly waste. The Review acknowledges that waste services are a matter for local authorities to develop fit for purpose local solutions, but that we believe that better procurement and joint working can improve the efficiency of collections while improving the frontline service for the public in an affordable and practical manner. The monitoring of service levels to understand whether and how they are changing will not require an Impact Assessment.

34. The Review also highlights the work Defra has done with WRAP and the Local Government Association on facilitating a new "**Waste and Recycling Services Commitment**". The revised commitment sets out how local authorities should seek to consult more, working with householders to make it easier for them to do the right thing. The Commitment will only be voluntary for local authorities, and it is likely that there will be no significant costs for local authorities of signing up to the Commitment which will showcase best practice already in place in some councils.. As the cost to the public sector will not amount to more than £5million annual costs, we are therefore not proposing to develop an individual Impact Assessment.

35. The Waste Policy Review also recognises that it is important that while householders do not feel that their civil liberties are being infringed by inappropriate and over-zealous enforcement practices, they do see bad behaviours that affect their local neighbourhood dealt with promptly and effectively, with enforcement targeted at those who deliberately and consistently break the law. Therefore we have reviewed **local authority enforcement powers and penalties** to check that they are appropriate and whether they need repeal or amendment. The Review outlines that we propose to remove criminal sanctions applying to householders who present their waste for collection incorrectly, and replace these with civil sanctions, and that we will ensure that level of fines are appropriate, and are in line with penalties for similar offences. Introduction of civil sanctions allows more proportionate and appropriate enforcement against offenders, better reflecting the costs incurred by such behaviour. The legislative changes will take time to implement but Impact Assessments will be produced (where required) as policy development proceeds.

36. The Waste Policy Review also explains the work Defra is undertaking with iESE (Improvement and Efficiency South East) and WRAP on improving partnership working between local authorities. As the Review explains, with local authorities facing strict funding constraints it is important that we work together to find efficiencies through better procurement, shared services, and combined decision-making. The Government wants to encourage and support authorities to form partnerships under which they can procure and provide services more effectively, as well as increase their bargaining powers when awarding contracts. Defra will assist by helping to develop a **route map to help local authorities through the stages involved in setting up waste partnerships**, including the legal issues. As the route map is providing guidance to local authorities to make it easier for them to set up waste partnerships it will not create any new mandatory burdens on local authorities and therefore we are not proposing to prepare an Impact Assessment for this work. Defra will also be supporting the work of iESE and WRAP in improving procurement skills. Again, this work will not require an Impact Assessment.

37. As well as encouraging joint working, the Waste Review reaffirms the Government's commitment to removing some of the bureaucracy and burdens that impact negatively on the delivery of front line services. As part of the Review process we have considered what burdens on local authorities could be reduced or removed. Firstly, we are proposing to **end the Landfill Allowance Trading Scheme (LATS)** at the end of the 2012/13 scheme year. Landfill Tax is now seen to be the more significant driver diverting waste from landfill, and LATS is judged to no longer be the most appropriate means of ensuring that England meets its share of the UK Landfill Diversion targets. In addition, the Call for Evidence for the Waste Review showed that LATS was perceived as a barrier to Local Authorities providing enhanced services to small businesses. An individual Impact Assessment ([Defra1362: Ending](#)

of the Landfill Allowance Trading Scheme) provides more details of the rationale behind ending the LATS.

38. The Waste Emissions and Trading Act 2003 contains a statutory duty to produce Joint Municipal Waste Management Strategies (JMWMS). The Act also exempted many authorities from producing them based on their performance in meeting recycling targets and obtaining an excellent in their Comprehensive Performance Assessment. However, a number of these criteria e.g. CPA and statutory recycling targets are no longer in existence. Therefore the Government has said that it will consider the options for the future of JMWMS. One of the options is the **removal of the statutory requirement to produce JMWMS** (although, we would continue to encourage authorities, through guidance, to produce them).

39. An initial light touch consultation with local authorities (they are the only sector affected by the requirement) showed that many wanted to have the wider context of the Waste Policy Review available before they commented on the future of JMWMS. Therefore we will be holding a further consultation with local authorities on this issue after the publication of the Review. An Impact Assessment will be produced to accompany this consultation, which will provide more details of the possible rationale behind removing the statutory duty. An initial estimate of the possible costs and benefits of removing the duty are provided below.

Removal of the statutory requirement to produce JMWMS – Costs and Benefits

Costs

There would be no direct costs or disadvantages to local authorities or businesses from removing the statutory JMWMS duty.

Benefits

Responses to a local authority survey carried out in 2009 indicated that the cost of producing the initial JMWMS cost between £100,000 and £150,000. The costs of reviewing strategies (every five years) was between £60,000 to £100,000. However, a number of authorities have indicated that they would continue to produce strategies without the statutory requirement anyway.

40. Finally, to further reduce burdens on local authorities the Waste Review highlights that Defra are looking to **reduce the amount of information we ask local authorities to report into WasteDataFlow (WDF)**. We will be doing this in full consultation with local authorities and other key users of WDF. The current estimated respondent burden for WDF as a whole is approximately £300,000 based on an estimated 8 hours per quarter for all local authorities (this 8hrs is borne out, on average, by a local authority survey Defra carried out in February 2011, asking them for the time it took to complete a quarterly return). At the stage, we have been able to produce an estimation of the possible costs and benefits of this action from looking at the compliance costs for local authorities balanced by the potential benefits realised from FOI requests averted from the 20,000 reports/year run by public users. These are provided below. Following further discussions with local authorities on the potential to remove more reporting burdens a full Impact Assessment will be considered.

WDF Reporting Burdens – Preliminary cost savings and benefits

Preliminary cost savings for reducing WDF reporting burdens

Defra has already made some initial suggestions for minor reductions to the WDF questionnaire that were implemented on April 1. We have estimated that these changes would save approximately 15-30 minutes in completing a return, which would amount to approximately a £10-20,000 burden reduction (at the clerical rate of £23.63/hr). Defra has also identified usability improvements and revisions to questions which will be incorporated into the WDF development program over the coming year. Possible savings are more difficult to quantify, but early estimates indicate a possible saving of up to 1 hour, equating to burden reduction of approximately £40,000.

Other benefits of WDF

As mentioned above, out of the 50,000 reports produced in 2010, 20,000 reports were requests from public users. If it assumed that each report would take 5 minutes to produce (at the clerical rate previously mentioned) this would assume an approximate benefit of at least £45,000. Other non-monetised benefits of WDF include having consistent data which can be used within local authorities for

local comparisons, and also having an established source of data in place potentially avoiding the cost to 358 local authority websites of having to publish this data (local authorities would need the information they supply to WDF for their own management purposes, regardless of the WDF report, so if there wasn't WDF in place to collect this information in one place nationally, it is possible they would have to publish their waste management data themselves under the transparency agenda).

41. The Waste Review highlights that while existing targets and data collection have focused on weight based measures of performance, it is increasingly the case that waste measurements are being considered in carbon terms, as this is seen accurate measure of environmental impact that weight. The Review commits Defra to promoting a **carbon metric reporting tool**. However, as we state in the Review, we do not anticipate this requiring any additional data collection or reporting (the tool working as a conversion calculator from existing reporting). An Impact Assessment is not anticipated for this work.

42. The Waste Review identifies the need to treat household and business waste, particularly from smaller businesses, as part of a single waste stream. Small businesses in particular find it difficult to recycle more, with many discovering that recycling their waste will actually increase their overall waste costs as they have to pay separately for recycling and residual waste collections. The Review concludes that all businesses, from the micro-business to the multi-national, should have access to regular, efficient and affordable waste collection and recycling services, whether provided by the private sector or their local authority. Defra will work with representatives of the waste management industry and with local authorities on a specific **Trade Waste and Recycling Collection Commitment**. This would provide best practice to local authorities on how to develop their trade waste business. As with the Waste and Recycling Services Commitment, the Trade Commitment will only be voluntary for local authorities, and the impact of the measures will unlikely cost the public sector more the £5million in annual costs. Therefore we are not proposing to develop an individual Impact Assessment.

43. Defra has also been working with the Environmental Services Association, the Federation of Small Businesses, Local Government Group and the Environment Agency to develop a voluntary **Waste Management Industry Responsibility Deal**. Under such an agreement, waste management companies would commit to help businesses to do the right thing by raising awareness of opportunities for waste prevention and resource efficiency, and improving the provision of recycling services for dry recyclates. Once an agreement has been reached we will consider whether a formal Impact Assessment is required. Discussions are also at too early a stage in the development of this policy to allow any preliminary figures for the costs and benefits of such an agreement to be estimated.

44. As any responsibility deal with the waste management industry would also have a strong focus on the quality of recyclates, Defra is also exploring with the Environmental Services Association and waste management industry the potential for a **code of practice for Material Recycling Facilities**. The code will include measurement of the quality of the input and output of the MRFs, with the intention of improving the overall quality of recyclate. Defra will be considering ways to maximise uptake of the Code, including options that could act to make the Code mandatory. A full Impact Assessment will be prepared to assist in the consideration of the possible options.

45. Finally for Empowering Local Communities, to further encourage people to do the right thing whether at home, work or out and about, the Review recognises we need to make it easier for them to do so. To support and recognise those communities that go further on addressing waste issues in their area we will offer local communities a toolkit of ideas, best practice and promotional material to use in their area to stimulate local action to assist in moving towards zero waste, supported with a tiered system of bronze, silver and gold awards. We will assess whether an Impact Assessment is needed for this guidance as it is developed.

Dealing with Food Waste

46. The Waste Review reaffirms that food waste should be treated as a priority waste-stream for action as it goes to landfill in considerable quantities, and accounts for almost half of all waste CO2e emissions. The total annual food waste arisings in Britain are estimated at around 16 million tonnes with at least 40% of this disposed to landfill. One of the Review's long term aims is to substantially reduce the amount of food wasted.

47. The Waste Review commits the Government to ensuring that the **public sector will lead by example across its own estate on food waste**. As part of this we have been developing minimum

buying standards for Government Departments and their agencies for the procurement of food and catering. As we develop the evidence base, we will look to raise these standards and roll out the lessons learned to the wider public sector. A further Impact Assessment will be considered as the policy is developed and the full range of possible actions considered.

48. Also on food waste, the Waste Review commits the Government to **exploring further the role of incentives** in both reducing food waste and ensuring it is managed in the most sustainable way possible. Likely costs and benefits will be developed during this exploratory work, but are not yet developed. Should any of the findings of this work require an Impact Assessment one will be produced as the policy development permits.

49. Finally, on food waste, the Waste Review commits the Government to exploring **successors to Courtauld 2** with business in the food retail and manufacturing sector as well as ways to **make it easy for business and consumers to reduce and manage their waste**, for example by working with industry sector bodies on food labelling, providing information and access to skills, and incentivising technological solutions such as user-friendly collection systems. Any proposals from this work that require an Impact Assessment will be assessed as appropriate.

Energy Recovery

50. The Government wishes to see an increase in energy recovered from waste through Anaerobic Digestion. Our evidence base shows that of the main options for the treatment of food waste, Anaerobic Digestion offers the greatest environmental benefit. Initial analysis carried out for the UK Renewable Energy Strategy 2009 suggests that the anaerobic digestion of food waste, livestock slurries, sewage sludge and crops could contribute at least 10-20 TWh of heat and power by 2020, representing 3.8-7.5% of the estimated renewable energy required by 2020 to meet the UK's obligations under the Renewable Energy Directive. Therefore, and due to close collaborative working between government, industry and a wide range of stakeholders, a new joint Government and industry **Anaerobic Digestion Strategy** has been published alongside the Waste Review.

Anaerobic Digestion Strategy – Comment on preliminary costs and benefits

Costs

The necessary Impact Assessments will be developed in due course. As the specific details of the policies are currently being agreed we are not in a position to provide preliminary costs at this point. However, we can say that as the AD strategy has actions for both industry and government, costs for implementing the actions will be shared by both. Most of the actions that are for government will be co-ordinated by WRAP.

Benefits

The AD strategy is expected to bring about a number of economic benefits such as growth in innovation and technical expertise to deliver and manage new anaerobic digestion plants. This area of waste may see higher growth in infrastructure and employment than other types of waste treatment. The AD strategy is expected to bring about a number of environmental benefits such as the reduction of GHG emissions from manure and waste management, an increase in renewable energy production, and the creation of renewable sources of critical resources such as phosphorus. AD also has a role to play in the management of manures and the control of diffuse pollution, and nutrient management. At this stage of the policy development we are unable to fully quantify some of the above benefits.

51. The Waste Review also identifies that proposals for energy from waste infrastructure can produce very emotive negative responses from local communities where such infrastructure is proposed and this is often re-enforced by public perceptions of energy for waste technology being shaped by outdated or incomplete information. The Review commits Defra to working with all involved to **identify commercially viable routes by which communities can be incentivised to host recovery infrastructure**. It is likely that the outcome of this work will be the further provision of guidance. If an Impact Assessment is required then one will be produced in due course.

52. To also help provide more up-to-date and complete information on the range of recovery technologies, the Waste Review also states that Defra will publish a **guide on the different recovery**

technologies. The purpose of the guide will be to provide information only. We will consider as we draft the guide whether an Impact Assessment is needed to accompany this work.

Landfill

53. While the Government has previously rejected general landfill bans previously, it is minded to examine the feasibility of specific **landfill restrictions**, where taking action on certain specific material streams may be appropriate to achieve a more efficient amount of waste being diverted from landfill. Restrictions enable a quicker and greater diversion from landfill than achievable through just the landfill tax approach. Immediate specific waste types for consideration include **wood waste**. A landfill restriction on wood waste would support increased diversion of wood waste above that delivered by the landfill tax on its own. The landfill tax incentivises a shift of waste away from landfill up the waste hierarchy to treatment such as recycling or waste prevention. The effectiveness of the landfill tax is dependent on the responsiveness to the tax rate but increasing the landfill tax to a sufficient level to divert greater amounts of specific materials away from landfill may require an inefficiently high tax rate, in which case a landfill restriction may be a better way of ensuring higher diversion from landfill. Maintaining an overlap of a landfill restriction with the landfill tax, which applies to a wider range of waste, may be efficient if the costs of monitoring and enforcing a landfill restriction on all wood waste are outweighed by the benefits. In addition to the greenhouse gas benefits generated from the additional diversion of wood waste from landfill such a ban or restriction would allow the recovery of energy from the diverted wood waste thus contributing to UK renewable energy targets. A consultation stage Impact Assessment – “Options to further restrict waste to landfill” - was published during a previous public consultation in March 2010 that examined the case for banning certain waste types from landfill. Some of the preliminary costs and benefits estimated for a specific wood waste landfill restriction are provided in the summary section below. We will also consider **other specific waste types** for action. Impact assessments for wood waste proposals and any other proposals for specific material type restrictions will be produced when policy development permits.

Wood waste landfill restriction – Preliminary Costs and Benefits

Costs

There would be costs associated with the introduction of landfill restrictions for wood waste comprised of additional collection and treatment costs, as well as enforcement costs and communications. A more detailed assessment of costs impacts would be undertaken as part of any consultation.

Benefits

It was estimated that where wood is assumed to be diverted from landfill into incineration with energy recovery the estimated savings are 1.340kg CO₂e per tonne. In total it was estimated that the GHG savings would be in the range of 2 – 2.3 Mt CO₂ equivalent over the period up to 2024 (for a restriction and ban on unsorted wood waste respectively). The net benefits to society (including costs) from a landfill ban on wood, for the period up to 2024, are estimated to be £0 to £-7 million for a ban without a sorting requirement.

Based on an estimate of 0.75 Mt of wood waste currently going to landfill the research indicated that, cumulatively, up to 1.75 Mt wood waste could be diverted from landfill, by a restriction between 2012 and 2024. This figure could be larger if higher baseline estimates of wood waste to landfill prove to be true.

54. The Waste Review identifies opportunities for increasing the amount of methane that is captured from landfill sites, which if exploited, could lead to greenhouse gas savings, contribute to the UK’s renewable energy goals, and help grow the green economy. To help ensure that this happens the Government has committed to exploring these opportunities, including by ensuring the right mix of incentives are in place as part of the broader energy from waste strategy and looking at removing barriers to the successful take up of new technologies and practices. Because of the early stage of this work, no costs and benefits have yet been developed. Should Impact Assessments be required for the work they will be developed as the policy process develops.

Infrastructure and Planning

55. The Waste Review cites the lack of information as a potential barrier to delivering the correct waste infrastructure mix. To help overcome this barrier, Defra has indicated that it will: **provide advice and support for local authorities on science and technology, including the full range of technologies**

available and their relative merits and work with the Environment Agency, local authorities and industry to draw together and **publish data on likely waste arisings and treatment capacity in future years**. As part of the development of this work we will consider, depending on how we decide this advice and information should best be presented, whether an Impact Assessment is required. Costs and benefits for this work have yet to be identified.

56. The difficulty in securing finance for new waste infrastructure technologies is also identified as a barrier to companies to building new waste infrastructure in the Waste Review. To help overcome this Defra will seek to expand capacity to treat Commercial & Industrial and Construction & Demolition waste through improved **information on waste supply and composition and developing further the supply chains for recyclates and solid recovered fuel**. Defra will also work with all parties to **help reduce commercial barriers to the effective financing of infrastructure** and in particular ensure that waste sector needs are considered in development of the Green Investment Bank's initial business plan. These policies are insufficiently developed to judge whether an Impact Assessment will be necessary. Should they be required then Impact Assessments will be developed as appropriate. No costs and benefits for this work have yet been identified.

Cumulative Impacts

57. As many proposals are at an early stage in the policy development process, it is not possible to monetise many of the costs and benefits of the proposed actions on waste prevention. The following sections aim to describe some of the expected impacts of the measures proposed in terms of costs and benefits on the main affected groups, such as householders, business and local authorities.

Impact on households

Raising awareness for better decision-making

58. An overriding priority of the Waste Review has been to make it easy for people to do the right thing, whether at home, work or on the go. The cumulative impact on householders of the measures set out in the Review will vary and depend on the precise circumstances of their local area and form of waste collection service their local authority provides. Overall, the measures in the Review are designed to improve the experience of householders. The Waste and Recycling Services Commitment will set out a series of principles which signatory local authorities commit to meet: as a result, some householders may experience changes to the design or frequency of the waste collection service they receive, but in line with the spread of best practice. The pilot reward and recognition schemes detailed in the Review may also lead to the wider introduction of innovative collection regimes over the next few years.

Better and less regulation

59. The proposed decriminalisation of certain household waste offences will ensure that householders are not prosecuted, or threatened with prosecution, for trivial matters such as putting their bin out at the wrong time. This will have a positive impact on householders. The accompanying introduction of stronger measures to tackle flytipping (e.g. seizure of vehicle powers), along with more targeted enforcement against those who persistently break the law with impact positively on the local environment.

Behaviour change

60. We expect that, over time, people will find it easier to dispose of and recycle their waste while out and about, particularly in urban areas where WRAP and Keep Britain Tidy are working with local authorities and food and retail service sector businesses to improve the provision of on-street waste disposal and recycling bins (with an accompanying fall in litter). The development of Responsibility Deals with industry – e.g. with the retail sector and hospitality sector, when added to separate initiatives on waste prevention and recycling, may also lead to small changes in the retail experience of householders when purchasing or leasing goods.

Capacity and institution building

61. The impact of waste infrastructure on householders will vary according to local circumstances. Landfill will continue to decline in the coming years and the number of landfill sites will fall, while the development of recycling or recovery infrastructure elsewhere will have impacts on other local communities. The Waste Review maintains the right of householders to have a say in the development of any local waste infrastructure and explores options for incentivising the acceptance by local community of infrastructure in their area.

Impact on business

Raising awareness for better decision-making, behaviour change and developing new markets and incentives

62. One of the key aims of the measures from the Waste Review are to make it easier for businesses to prevent and treat waste in a manner that reduces costs to society. In doing so, in many cases businesses may also gain from reducing the consumption and use of resources through reduced costs of production and expenditure on waste carriers. Businesses should be able to make better informed decisions as they will have greater awareness of the benefits of waste prevention in particular, with access to waste prevention toolkits, training courses and illustrative case studies. Behaviour change relating to waste prevention will be aided by the Waste Prevention Loan fund which will help reduce the barriers to changing business practices due to initial costs. As businesses have to pay for their waste treatment directly, any reduction in waste arisings should benefit businesses directly but there is a timing difference between the investment and time required to implement changes and the flow of benefits. As a result of these initiatives, businesses should find it easier to implement change and improve resource efficiency, cutting costs and improving competitiveness.

63. SMEs should be better informed and able to make decisions regarding their waste. Proposals to initiate a SME Waste minimisation network will support SMEs in particular and allow sharing of information and capacity and institution building. Collective action and partnerships can facilitate sharing of information and provide support to smaller companies that do not have the same access to resources as larger companies. Smaller businesses should also benefit from the waste management responsibility deal which would commit the waste management industry to raise awareness of opportunities for waste prevention and resource efficiency.

64. Proposals for measures relating to resource efficiency explore some ways of reducing informational barriers to change and working with businesses to deliver economic benefits. Research commissioned by Defra examining the potential financial and environmental savings of resource efficiency shows that businesses can make low or no-cost resource efficiency changes that could deliver £23bn of gains within a year. Proposal that address the informational and inertia barriers to business behaviour can free up resources in the economy and deliver growth at minimal cost. Further potential measures aimed at the design and manufacturing stage in order to reduce the externality of impacts embedded at the production stage will also lead to a lower environmental impact over the life cycle of a manufactured product. Businesses are likely to have better information on the benefits of design and production and may be better able to produce environmentally friendlier products. Other potential measures relating to standards and labelling may allow consumer to make better informed choices which could grow demand for these products.

Better and less regulation

65. Producer responsibility obligations are an important in making businesses take the wider impact of their actions into account. At the same time, the burden of compliance should be minimised and businesses should be able to be flexible in their actions. This is a key factor in enabling a smooth transition to a green economy incurring minimal costs in the process. The context of the green economy is discussed in an underlying background economic paper for the Review of Waste Policies. Responsibility deals in key sectors can be effective in allowing stakeholders to show responsibility and deliver without having the burden of further regulatory intervention. Responsibility deals allow a flexible approach and can be a cost effective way for government and businesses to achieve better environmental outcomes. To the extent that landfill restrictions are explored further, there may be costs to businesses which will be incurred and detailed in further analysis as options are considered.

66. The overall burden on businesses should reduce as a result of the consideration of non regulatory means of implementing waste policy where possible. The shared statement of action with BIS and the Environment Agency should result in a reduced burden on businesses that demonstrate compliance. A wider distinction between those businesses that are complying and those that are not should incentivise greater compliance and reduced costs incurred.

Impact on local authorities

Better and less Regulation

67. The Waste Review has sought to identify and where possible reduce burdens on local authorities. It is anticipated that the reduction of the amount of information local authorities have to report into WasteDataFlow combined with the possible removal of the statutory requirement to produce Joint Municipal Waste Management Strategies and the ending of the Landfill Allowance Trading Scheme (LATS) will result in a small reduction of cost burdens on local authorities.

68. The Review also proposes a review of local authority enforcement powers and penalties to ensure that the powers and penalties currently in place are appropriate for the seriousness of the actions they seek to prevent. The result of this review may be a more light touch regime making greater use of the Macrory principles of restorative justice.

To the extent that landfill restrictions are explored further, there may be costs to local authorities which will be incurred and detailed in further analysis as detailed options are considered.

Raising awareness for better decision-making

69. Other proposals included in the Waste Review will seek to support local authorities, either through providing clearer information or guidance or through providing access to financial support. Proposals to: provide a carbon metric reporting tool; a route map to help local authorities set up waste partnerships; advice and support to improve procurement of services and goods; a scheme to support a number of innovative reward and recognition schemes to encourage recycling; provide advice and support for local authorities on the full range of different recovery technologies available and their relative merits, as well

as publish data on likely waste arisings and treatment capacity in future years; and seeking to identify commercially viable routes by which communities can realise benefits from hosting recovery infrastructure, will all assist local authorities with their waste policy making without imposing any additional costs on them. The costs of providing this information and support will be incurred by central government.

70. Financial support will also be made available to help local authorities promote waste prevention activities through the proposed Waste Prevention loan fund.

Capacity and Institution Building and Behaviour change

71. There are a number of proposals in the Waste Review that require agreement from individual local authorities to act, which may result in an increased cost for them. These are the waste collection commitments (on household and trade waste). Meeting some of the standards in these agreements may incur a cost but they are entirely voluntary for local authorities to sign up to. Such agreements do allow local residents to see the standards they should expect from their local authority, and for authorities that sign up to the agreement they can demonstrate that they are meeting nationally agreed standards of service.

72. The Review also commits the public sector to lead by example across its own estate on food waste. Work on this is very early in development and it maybe there are some costs involved for local authorities (as well as Central Government departments). However, removing food waste from landfill generally is shown in the waste review to offer a number of benefits from reducing greenhouse gas emissions to local authorities having to pay less landfill tax. If local authorities can show that there are employing best practice in dealing with food waste, from prevention to disposal, then it will assist them in promoting better practice locally.

Specific Impact Tests

Statutory Equality Duties

73. An initial screening of the Waste Policy Review proposals has not revealed any statutory equalities impacts. The proposals put forward in the Review would be expected to impact equally on all affected people and there would be no impact on gender, race or disability equity. However, as detailed proposals are developed and implementation plans considered we recognise that it will be important for policy planners and service providers to consider whether there will be any effects on different local groups. Where separate Impact Assessments are developed then further assessments will be conducted.

Economic impacts

Competition Assessment

74. The market most directly affected by the Waste Policy Review will be the waste management industry. There will, of course, be a potential impact on all businesses that produce waste to some degree and, as one of the main objectives of the Review is to promote waste prevention, a potential impact on those businesses that provide goods and services. However, as we are not proposing any substantial new regulations or taxation it is unlikely that there will be any significant impact on the market. We have briefly addressed the four OFT competition filter questions below. Having considered the four filter questions, it is our view that these proposals will not have any significant impact on competition between suppliers. The proposals put forward in the Waste Policy Review though will be considered, as required, in more detail as part of the development of that individual policy.

Directly limits the number or range of suppliers

None of the proposals put forward in the Waste Policy Review will award any exclusive rights to supply, create a form of licensing scheme or introduce a fixed limit on the number of suppliers. Through the Review we want to encourage local authorities to form partnerships under which they can procure more effectively, and have proposed the development of a route map to help local authorities (see paragraph 36 above). We believe that there are benefits to be secured from encouraging local authorities to exercise collectively greater bargaining power when securing contracts, while also allowing greater economies of scale to be achieved. However, there will be no obligation on local authorities to procure services in such a way. When developing the route map we will consider further whether there may be any issues surrounding whether this would constitute procurement from a restricted group of suppliers.

Indirectly limits the number or range of suppliers

The proposals put forward by the Waste Policy Review will not indirectly restrict the number of suppliers. There are only a small number of regulatory proposals within the Waste Review, of which a number seek to remove perceived barriers to suppliers – such as the proposal to end the Landfill Allowance Trading Scheme (see paragraph 37 above). The range of producer responsibility deals we propose in the Review will be also only be voluntary, and it will be for businesses to decide whether they should sign up to any agreements.

Limits the ability of suppliers to compete

There are no proposals in the Waste Policy Review that control or substantially influence the price a supplier may charge. We are considering how mandatory standards for the design of energy using products might include some requirements that deliver waste prevention (see paragraph 23 above). We will consider whether these standards may control or influence the characteristics of products supplied as we explore the possible options. Otherwise, a number of our proposals seek to provide businesses and consumers with more information to allow them to make more informed decisions (i.e developing product standards supporting voluntary environmental labelling schemes, working with businesses to provide better information on optimum lifetimes of products and product care).

None of the proposals limit sales channels a supplier can use, restricts the ability of suppliers to advertise or imposes restrictions on supplier's production processes. Neither do any of the proposals limit the scope of innovation to introduce new products. In fact, the Review has considered whether there are any barriers to the introduction of new technologies, particularly in areas such as energy recovery.

Limits suppliers' incentives to compete vigorously

A preliminary assessment of the proposals in the Waste Policy Review do not indicate that any of the actions will: exempt suppliers from general competition law; require or encourage the exchange between supplier, or publication of information on prices, costs, sales or outputs; or increases the cost to customers of switching between suppliers. Where we are proposing to work with business on the provision of more information (such as on optimum lifetimes of products or on likely waste arisings and treatment capacity) we will consider during the development of the actual proposal whether there are any possible competition issues.

Small Firms Impact Test

75. One of the key findings of the Review is that we need, as a country, to be doing more on dealing with business waste, especially from SMEs (small and medium sized enterprises). The Review finds that we have not focussed enough on the environmental and efficiency benefits that could be gained if we treated household and business waste – particularly from smaller business – as part of a single waste stream. The 2010 Defra survey of Commercial and Industrial waste producers showed a recycling rate (including reuse) of 52%, an increase from 42% in 2002 (compared to a household waste recycling rate of approximately 40% today). The SME recycling rate stands at 49% for businesses with fewer than 10 employees, but for those who do not work at home, access to a recycling service that is convenient and affordable can sometimes be difficult. Further, in the survey, 13% of smaller businesses claim that “there is no service available” as a reason for not recycling, and many also often discover that recycling their waste will actually increase their overall waste costs as they have to pay separately for recycling and residual waste collections. During the Call for Evidence stage of the Review we heard repeatedly from SMEs and their representative organisations (including the Federation of Small Businesses) about the difficulties they can face in this area.

76. The majority of the proposals put forward in this Review do not seek to impose new mandatory costs on businesses, but do seek to make it easier for businesses, especially SMEs to ‘do the right thing’. Some of these proposals include:

- Agreeing a new **Trade Waste and Recycling Collection Commitment** that will seek to improve the experience and access of SMEs to cost-effective recycling services
- Agreeing a series of **voluntary responsibility deals** to promote waste prevention and greater recycling, specifically including one with the Waste management industry to improve the excess of SMEs to cost-effective recycling services.
- Working with local authorities, Local Enterprise Partnerships, Chambers of Commerce and local trade associations to encourage SMEs to participate in **collective recycling contracts**.
- Ending the **Landfill Allowance Trading Scheme (LATS)**, which is perceived as a barrier to Local Authorities providing enhanced services to small businesses, at the end of the 2012/13 scheme year.
- Creating a **Waste Prevention Loan Fund** to provide a small pot of low-cost loans to SMEs, amongst others, to encourage waste prevention activities.
- Encouraging the expansion of **SME Waste minimisation networks**
- Helping to develop ‘**pioneer projects**’ to demonstrate business models that benefit from waste prevention.
- Taking forward action on **better waste regulation and enforcement** including reducing the burdens of inspection on businesses that are already demonstrating agreed standards.
- The Review will also seek to **raise awareness** amongst businesses, particularly SMEs, of their obligations to pass their waste to a legitimate and registered waste carrier (Duty of Care) so as not to inadvertently facilitate fly tipping.

77. Where full Impact Assessments are required for any of these proposals a further Small Firms Impact Test will be conducted to assess in more detail the impact of that policy on small businesses.

Environmental Impacts

Greenhouse Gas Assessment

78. The terms of reference for the Waste Policy Review make clear that one of the key objectives of the Review is to ensure that we “maximise the contribution that waste management in England can make to UK energy and climate change goals, both renewable energy targets and the long term goals for greenhouse gas emission reduction by 2050.” (Waste Review Terms of Reference June 2010).

79. Many of the proposals in the Review are expected to reduce emissions of greenhouse gases, either by reducing the amount of methane gas emitted from landfills (a key source of emissions from waste) or more generally across the economy through preventing waste, increasing recycling and extracting energy from waste.

80. However, the range of proposals put forward in the Review are at differing stages of development and providing any meaningful impact on greenhouse gas emissions due to the Review as a whole would be impossible at this stage. Full greenhouse gas assessments will be provided for each individual policy, where full impact assessments are required, as the individual policy is developed.

Wider Environmental Issues

81. Wider environmental impacts may be assessed in the context of ecosystem services. These impacts include climate change (see above), water including flood risk, waste management, air quality, noise, landscape and biodiversity. The review will, inter alia, impact on the way waste and resources are managed in England. One of the wider environmental issues checklist questions does specifically pose the question as to whether the policy option will lead to a change in the financial costs or the environmental and health impacts of waste management. Clearly, the purpose of the Waste Review is to change the amount of waste produced, as well as affecting the use of recycled materials, the type of waste produced or collected as well as changing how waste is managed. The intention of the Review though is to drive waste back up the Waste Hierarchy, so more waste is prevented in the first place, with more waste prevention and reuse of materials encouraged as well as the growth in recycling maintained. It is not, therefore, anticipated that the Waste Review will have any negative environmental or health impacts. Due to the wide range of waste policies proposed, however, individual Impact Assessments (where required) will be completed that will provide a specific assessment of the Wider Environmental Issues of that individual policy. Such assessments will be informed by appropriate evidence, which may be drawn from new or existing research, such as Life-Cycle Assessment (LCA), Cost-Effectiveness Analysis or Multi-Criteria Analysis (MCA).

Social Impacts

Health and Well-being

82. An undertaking of the Department of Health’s health and well-being screening questions for the health impact assessment does not show that the proposals put forward in the Waste Review will have any significant impact on human health, related lifestyle variables or the demand on health and social care services. We do not therefore propose to undertake a full health impact assessment for the Waste Review. However, individual health and well-being screening assessments will be undertaken individually, as required, for policies contained in the Waste Policy Review as they are taken forward.

Human Rights

83. There are no human rights issues raised by these proposals.

Justice System

84. For the majority of the proposals in the Waste Policy Review there will be no impact on legal aid, courts and tribunals, prisons and probations services, prosecuting bodies or the judiciary as the proposals themselves do not entail any criminal or civil sanctions (being mainly voluntary or advisory). However, a number of the proposals do entail a review of waste criminal sanctions and enforcement powers (for example, see paragraphs 30 to 32 above). Where any proposal will impact on the justice system an individual assessment will be carried as and when required.

Rural Proofing

85. The proposals that have been put forward as part of this Waste Policy Review are unlikely to have a different or disproportionate impact on rural areas due to particular circumstances or needs. However, one of the key objectives of the Review is to ensure that more decision making powers are decentralised to local communities. As policies are developed, further assessments will undertaken, as required, to ensure that individual policies do not have a different or disproportionate impact on rural areas, and where proposals allow for future policies to be developed locally, we recognise that it will be important for local policy planners and service deliverers to consider any impacts on different local groups.

Sustainable Development Impact Test

Stage 1

1. Environmental Standards

1a. Are there any significant environmental impacts of your policy proposal (see Wider Environment Specific Impact Test)?
Yes <u>No</u>
If the answer is 'yes' make a brief note of the impacts below:
N/A

1b. If you answered 'yes' to 1a., are the significant environmental impacts relevant to any of the legal and regulatory standards identified?
Yes No
If the answer is 'yes' make a brief note of the relevant standards below:
N/A

If you answered 'yes' to 1b, have you:
1c. Notified the Government Department which has legal responsibility for the threshold and confirmed with them how to include the impacts appropriately in the analysis of costs and benefits?
N/A
1d. Informed ministers where necessary?
N/A
1e. Agreed mitigating or compensatory actions where appropriate?
N/A

2. Intergenerational impacts

2a. Have you assessed the distribution over time of the key monetised and non-monetised costs and benefits of your proposal? This assessment can be included in your Evidence Base or put in an annex.
Yes <u>No</u>
Full intergenerational assessments will be conducted, as required, on an individual basis for the proposals put forward in the Waste Review.

2b. Have you identified any significant impacts which may disproportionately fall on future generations? If so, describe them briefly.
Yes <u>No</u>

One of the main purposes of the Review is to ensure that we have the right waste policies in place to help deliver an economy that will use and manage our natural resources in a sustainable way - to meet not only our current needs but the needs of future generations.

If you answered 'yes' to 2b. , have you:

2c. Informed ministers where necessary? If so, provide details.

N/A

2d. Agreed mitigating or compensatory actions where appropriate? Provide details.

N/A

Stage 2

3. The purpose of the second stage is to bring together the results from the impact assessment with those from the first stage of the SD test. The following questions are intended to reflect the uncertainties in the cost benefit analysis and help you consider how to proceed in the light of further evidence from the first stage of the SD test.

3a. Indicate in the appropriate box whether the balance of monetised costs and benefits is:

Strongly positive	Moderately positive	Roughly neutral / finely balanced	Moderately negative	Strongly negative
N/A	N/A	N/A	N/A	N/A

3b. Indicate in the appropriate box whether the balance of non-monetised costs and benefits is likely to be:

Strongly positive	Moderately positive	Roughly neutral / finely balanced	Moderately negative	Strongly negative
N/A	N/A	N/A	N/A	N/A

3c. Indicate in the appropriate box whether the results of the SD questions 1-3 are, on balance, likely to be:

Strongly positive	Moderately positive	Roughly neutral / finely balanced	Moderately negative	Strongly negative
	✓			

3d. Indicate in the appropriate box whether, overall, the balance of the monetised and non-monetised costs and benefits and the sustainability issues is considered to be:

Strongly positive	Moderately positive	Roughly neutral / finely balanced	Moderately negative	Strongly negative
	✓			

3e. Provide an explanation of the final result from 3d, explaining, for example, how you have compared monetised and non-monetised costs and benefits and how you have resolved any conflicts between the cost-benefit results and the SD results.

Due to the varying stages of policy development for the proposals put forward in the Waste Policy Review it was not possible to undertake a meaningful summary of all the monetised and non-monetised costs and benefits. Where formal Impact Assessments are required for individual proposals then cost and benefit summaries will be prepared. However, one of the main purposes of the Waste Policy Review is to ensure that we have the right waste policies in place to enable us to use and manage our natural resources in a sustainable way, meeting not only our current needs but the needs of future generations. We therefore anticipate that the Waste Policy Review, as a whole, will have a broadly positive impact on sustainable development in England.

Annexes

Annex 1 should be used to set out the Post Implementation Review Plan as detailed below. Further annexes may be added where the Specific Impact Tests yield information relevant to an overall understanding of policy options.

Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. If the policy is subject to a sunset clause, the review should be carried out sufficiently early that any renewal or amendment to legislation can be enacted before the expiry date. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

<p>Basis of the review: [The basis of the review could be statutory (forming part of the legislation), i.e. a sunset clause or a duty to review, or there could be a political commitment to review (PIR)];</p> <p>Defra's updated structural reform plan commits the Department to undertake an assessment of the progress against the commitments made in the Waste Policy Review by March 2012. A more formal review of the outcomes of the Waste Policy Review will be considered for 2014 (3 years after the publication of the Review) or 2016 (5 years), whichever is most appropriate. In addition, the separate policies that form the Review will each be considered for a PIR in their individual Impact Assessment.</p>
<p>Review objective: [Is it intended as a proportionate check that regulation is operating as expected to tackle the problem of concern?; or as a wider exploration of the policy approach taken?; or as a link from policy objective to outcome?]</p> <p>The objective of the progress assessment review will be to ensure that the appropriate progress is being made on the commitments set out in the Waste Policy Review. The objective of any more formal review will be considered when appropriate.</p>
<p>Review approach and rationale: [e.g. describe here the review approach (in-depth evaluation, scope review of monitoring data, scan of stakeholder views, etc.) and the rationale that made choosing such an approach]</p> <p>An initial assessment will be made of the progress of each commitment against the target deadline outlined in the Waste Policy Review.</p>
<p>Baseline: [The current (baseline) position against which the change introduced by the legislation can be measured]</p> <p>Not applicable</p>
<p>Success criteria: [Criteria showing achievement of the policy objectives as set out in the final impact assessment; criteria for modifying or replacing the policy if it does not achieve its objectives]</p> <p>Success criteria for the Review will be whether the deadlines for each commitment are being met. Success criteria for each individual policy will be decided separately.</p>
<p>Monitoring information arrangements: [Provide further details of the planned/existing arrangements in place that will allow a systematic collection systematic collection of monitoring information for future policy review]</p> <p>Not applicable</p>
<p>Reasons for not planning a review: [If there is no plan to do a PIR please provide reasons here]</p>