



Our ref: JRB/
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Dear Anne-Marie Benoy

RE: Supporting the delivery of a Circular Economy in a post-Brexit environment: Joint Waste Disposal Authorities (JWDAs)

The JWDAs (the Joint Waste Disposal Authorities of Greater Manchester, Merseyside and four covering some two-thirds of London) deal with around 16.1% of England's local authority collected waste.

The EU vote to leave the UK has left the waste and recycling sector in a quandary. Our sector is rooted in European regulation, and whilst the plan for engagement with Europe may be 'business as usual' until the exit negotiation process is complete, there is still much that we do not know about what this will mean for us.

Over recent years we have worked resolutely towards our 2020 European's waste targets, and with just over 3 years remaining, there is still a lot to do. Naturally, the industry will be uneasy about making changes or justifying further investment when it no longer knows if these targets will apply. Moreover, the long term is even more uncertain since it isn't clear whether the UK will voluntarily sign up to the EU's proposed Circular Economy legislation, or decide to forge its own path towards resource efficiency.

Undoubtedly, the Circular Economy concept at the heart of the proposals being brought forward by Europe is at the very forefront of global waste and product policy, and has the potential to bring significant environmental as well as economic benefits. However, outside of the constraints of the existing EU Framework, and without the same need for political conciliation, we believe that the UK can lead the world in product sustainability.

- Based on our joint knowledge and experience the JWDAs would propose developing an **English Resource Strategy** that outlines a joint and shared vision across all stakeholders, to provide a long term framework that informs future investment infrastructure and market opportunities.

This English Resource Strategy should consider a suite of measures to drive action right across the value chain of all sectors from the point of specifying a product right through to its disposal by the customer to give resources the best chance of being returned to the economy. Those measures should include:

- A product policy that enables the UK to be at the forefront of product design and efficiency, by fully incorporating material eco-design.
- Developing markets for recycling materials to increase recycling rates through supporting secondary material prices to enable competition with virgin material, and through rewarding recycled content and eco-design.
- Reducing the trading risks that are leading to a high failure rate in the recycling industry, and in turn lowering investment along the value chain. This requires price stability to allow private sector investment, and as such may need an innovative model of public sector support/profit sharing to be developed.
- Developing capacity to recycle materials within the UK, so that we have long term sustainable markets to support the value chain.
- Recognising the contribution that waste can make to energy security, and encouraging the development of UK capacity to generate more energy from waste that cannot be recycled viably.
- Designing a more practical approach to waste targets based on environmental and economic benefits rather than amounts of waste.
- Harmonising collection systems over a period of time, by converging to a system that is driven by market potential and technology.
- Being able to fully exploit the potential opportunities of having a low carbon economy outside the EU, creating economic activity and jobs for the nation.

Yours sincerely

John Bland
Treasurer and Deputy Clerk
Greater Manchester Waste Disposal Authority