

# ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

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## Response to the UK resources Council consultation on a Resources & Waste Sector Deal

### Executive Summary

1. The EPF welcomes the creation and work of the UK Resources Council and the opportunity to respond to the UK Resources Council's consultation on a proposed UK Resources and Waste Sector Deal.
2. The EPF supports the UK Resources Council vision as set out in the document to design out waste wherever possible and capture and utilise all remaining recoverable resources and the headline mapping of the contribution that sustainable resources and waste management can make to clean, low carbon economic growth, environmental protection and social wellbeing. The EPF believes that it would be helpful to include a strong statement about the potential contribution that the sector can make across a range of important agendas – from environmental protection and pollution prevention through to net zero carbon, natural capital preservation, resource security, energy, clean growth and the bioeconomy – at the beginning of the Sector Deal document.
3. This contribution, however, is dependent on a wide range of actors across the material and product life cycle and therefore on how the resources and waste sector is defined. While the draft Sector Deal acknowledges this in the section entitled 'Stronger Together', the detail in the subsequent chapters suggests that the Deal is focused primarily on the 'treatment' part of the resources and waste sector. While it is understandable that a Sector Deal needs to be clearly focused, this relatively narrow perspective does not acknowledge or seek to strengthen the role played by other actors that are critical to achieving many of the objectives; e.g. local authorities, materials reprocessors and remanufacturers, the third sector, etc. In addition, it is limited to England only. This is consistent with the political scope of Sector Deals, but since the document refers to the opportunities offered up by an industrially-embedded resource sector, and that the sector operates broadly at a UK level in terms of the main opportunities and challenges covered in the document, the EPF feels that this is a potential weakness. Some acknowledgement could be included regarding the additional benefit of acting at a UK -wide level.
4. Aligned to this, the Sector Deal makes reference to the need to work collaboratively with UK plc across a range of industries to make circular economic business models and resource productivity a reality, but offers little detail on how this

might be achieved. In addition, wider industry representation from key 'client' sectors – e.g. chemicals, construction, etc – on the UK Resources Council itself is also limited.

**5.** The professional bodies that make up the EPF cover a wide spectrum of industries – including chemicals, energy, water, agriculture, building, ecology, material sciences, etc – with an interest in sustainable resource and waste management, environmental protection and the Circular Economy. The EPF would be interested in supporting and being involved in the work of the UK Resources Council as it develops its proposals further.

## Responses to questions in Sections 1 to 5

### Section 1: Role of the UK Resources Council

Ambitions:

- To advise the sector on the highest value opportunities for the UK's secondary resources;
- Improve and transform how we do our job today, while setting a clear and ambitious set of outcomes for our role in the future;
- Decarbonise our sector by designing processes to achieve a 30% reduction by 2030 and a fully decarbonised resources and waste sector by 2050;
- Enable and facilitate others to unlock a cleaner economy to improve resource productivity, and deliver a decarbonised economy;
- Identify the barriers to unlocking greater value to the economy;
- Build deeper and on-going collaboration between those who produce, consume and reuse resources;
- Accelerate investment in resource management and recovery processes; and
- Act today to start the journey.

**6.** EPF agrees broadly with the ambitions of the UK Resources Council but would expect them to be SMART with tangible outcomes, clearly mapped out against proposals developed in the subsequent chapters and the 5 Foundations for a Sector Deal and linked to a circular approach to materials and resources with explicit reference to waste prevention as well as resource recovery. In addition, they should reflect the sector's contribution not just to the successful delivery of the Government's Resources & Waste Strategy but also to the wider environmental objectives in the Defra 25-year Environment Plan (25YEP) and the recently published Environment Bill.

**7.** With regard to the ambition on plastics leakage, EPF appreciates that there is a current policy and media focus on plastics, but the future vision for the sector should be to ensure resource productivity across all material streams, including critical raw materials that underpin clean growth, and eliminate the leakage of any waste into the environment.

**8.** In light of 6. and 7. above, EPF would suggest that a further two ambitions be considered around developing a natural capital approach and contributing to environmental net gain as articulated in the 25YEP and around building the UK's capacity and resilience to manage and derive value from its secondary resources

and reduce reliance on the export. In addition, EPF would suggest changing the following ambitions as shown in red:

- Building deeper and on-going collaboration between those who **design, produce, consume, repurpose** and reuse resources **in line with circular economy principles**
- **Eliminating the leakage of waste materials into the environment, focusing on plastics as an immediate priority**

9. The ambitions are all of equal importance to long term success, but present different levels of challenge and lead time. Therefore, those that will deliver maximum impact but will take longer to achieve and present more barriers could be prioritised.

## Section 2: Defining our Sector

10. In addition to the points made in 3. regarding how the sector is defined, the summary of the key functions and activities of the sector presented in Section 2 does not include the education and behavior change role of the sector – variously undertaken by local authorities, material specific organisations and reprocessors, NGOs and private sector waste companies. These have traditionally played a key role in raising consumer awareness and driving change across a range of behavioural areas including littering, recycling, waste prevention, etc. Unless waste and resources are to become the focus of a sustained awareness campaign by UK governments in the future, EPF believes this important role must be acknowledged as part of both current and future scenarios.

11. The consultation includes a clear summary of 'business as usual' but does not address how this may have to change to adapt to future trends, particularly the drive for greater waste prevention. The roll out of Extended Producer Responsibility frameworks, further progress towards more circular economy business models by manufacturers and retailers, heightened consumer awareness and behavior change (i.e. on single use plastics), resource constraints and changing global markets, will all affect the sector, change its relationship with the consumption supply chain and impact on the shape of future services and infrastructure. Some assessment of these factors is therefore necessary when considering what elements of the sector's current business model should or shouldn't be included in the Sector Deal. At the very least, the role, dominance, and efficiency of the technologies currently deployed is likely to change over time.

## Section 3: Stronger Together

12. EPF welcomes the summary of headline benefits of an industrially embedded resource sector and the mapping across to the key Government strategies. However, the Section does not put forward a vision of how the sector as defined in the Sector Deal will develop the supply chain relationships that are acknowledged as being important to success – see paras 11 and 14.

**13.** With regard to indicators, EPF supports the proposal for key indicators on GVA, carbon and social profit but would suggest that the range of metrics deployed to measure the success of the Sector Deal should also cover:

- the benefits to the economy of waste prevention as well as resource recovery
- contribution to natural capital preservation

#### **Section 4: Five Foundations for a Sector Deal (Capturing the challenges)**

**14.** With regard to identifying the challenges ahead, one of the most pressing ones for the resources and waste sector is building new relationships with producers as the latter seek to control and/or retain stewardship of materials as they move through the economy. Meeting this challenge is essential if the sector is to position itself as an 'enabler', operating at the centre of material resource flows through the economy in the future. It will require a step change in approach, including diversification, strategic alliances and joint ventures, and innovation in services and technology, and EPF suggests that this step change should be more clearly addressed both in the Sector Deal and through wider industry representation on the UK Resources Council itself.

#### **Section 5: Analysis & Outputs of the Working Groups**

##### **Business Environment**

**15.** EPF supports the objectives set out in Section 5.0, namely:

- investment in high quality and granular data, that is mandatorily supplied by the relevant organisations, publicly owned, and openly available to all interested organisations across the broad resources & waste sector;
- ensuring that all relevant stakeholders have meaningful input to regular reviews of the policy and regulatory regime, to ensure that it is fit for purpose and achieves its objectives; and
- developing effective cross-sector frameworks to champion and support high levels of compliance, competency, professionalism, and best practice.

There is insufficient detail, however, to comment on the specific proposals set out under these objectives.

##### **Infrastructure**

**16.** EPF agrees with and supports the proposal to develop an infrastructure road map to underpin a more strategic national approach to resource and waste infrastructure planning and delivery. This must deliver the 'whole-system inspired UK waste and resource infrastructure' proposed at the beginning of the Section, be resource-led to maximise the benefits to the future UK economy, and aligned with key policy objectives on resource productivity and security, zero avoidable waste and environmental net gain.

**17.** As already noted, it should take account of major developments in the policy framework that are shifting behavior toward increased Producer Responsibility and

circular economic business models, and infrastructure needs related to reuse and remanufacture as well as recycling and recovery.

## Place

**18.** Maximising the resources and waste sector's economic, environmental and social contribution in the future requires action at a local, national and international level and EPF agrees with the proposal for an approach that combines local and regional economic development opportunities – through collaboration with LEPs and other organisations and networks – and a national materials priority matrix.

**19.** In addition, EPF would expect the Sector Deal to articulate and support the key role that the sector can play in the future in reducing the impact of the UK's resource consumption and waste generation on an international scale, including on the reduction of marine plastics pollution.

## People (Skills & Competence)

**20.** The professional bodies that are part of the EPF champion proven professional competence, skills and continued professional development right across the environment sector, including skills that are critical for the resources and waste sector. Developing the skills base to move to a low carbon, clean growth economy is a priority for all EPF members and the Forum supports the proposal for increased investment in skills for the future. The EPF would be keen to contribute as appropriate to the development of a sector skills plan and to work with the UK Resources Council on its delivery.

## Ideas (Innovation & R&D)

**21.** EPF supports the commitment to bringing forward innovation that enhances resource productivity and efficiency and reduces the impacts associated with the consumption and disposal of materials and products. The R&D strategy developed for the resources and waste sector should be aligned to and complement the infrastructure road map discussed in the consultation and be explicitly forward looking. The strategy should identify priority areas, products, materials and chemicals that currently pose a challenge, as well as those coming through the product pipeline in the future for which recycling and treatment capacity does not yet exist and/or has clear barriers in terms of development and commercialisation (e.g. carbon fibre, lithium batteries, etc).

**22.** In addition, innovation in areas such as logistics, digitalisation, robotics, and data sciences have a considerable contribution to make to resource recovery and productivity, as does behavioural science to ensure that the sector continues to play a key role in terms of driving behaviour change towards more sustainable, circular models.

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## Notes

1. The Environmental Policy Forum (EPF) is a membership group established to provide the opportunity for collaboration, learning, dialogue and debate amongst professionals across the environmental disciplines. We work together to influence environmental policy and its formulation by ensuring that environmental sustainability is high on policy agendas.

<https://www.envpolicyforum.org.uk/>

2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing around 6,000 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues.

[www.ciwm.co.uk](http://www.ciwm.co.uk)

3. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making.

[www.the-ies.org](http://www.the-ies.org)

4. The Institute of Fisheries Management (IFM) is an international organisation of people sharing a common interest in the modern management of recreational and commercial fisheries.

[www.ifm.org.uk](http://www.ifm.org.uk)

5. The Institute of Materials, Minerals and Mining (IOM3) is a major UK engineering institution whose activities encompass the whole materials cycle, from exploration and extraction, through characterisation, processing, forming, finishing and application, to product recycling and land reuse. It exists to promote and develop all aspects of materials science and engineering, geology, mining and associated technologies, mineral and petroleum engineering and extraction metallurgy, as a leading authority in the worldwide materials and mining community.

<https://www.iom3.org/>

6. The Society for the Environment (SocEnv) is comprised of 24 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism.

[www.socenv.org.uk](http://www.socenv.org.uk)