

# **Inquiry into Waste and Resources by the National Assembly for Wales' Environment and Sustainability Committee**

## **Memorandum by WRAP Cymru (the Waste & Resources Action Programme in Wales)**

### **Executive Summary**

1. WRAP Cymru welcomes the opportunity to provide written evidence to the Environment and Sustainability Committee's Inquiry into Waste and Resources. WRAP Cymru was established in September 2008 and is the Welsh Government's delivery partner for waste and resource efficiency issues. As a member of the Waste Strategy Steering Group, WRAP has actively supported the development of the Welsh Government's overarching waste strategy Towards Zero Waste, One Wales: One Planet and has utilised its expertise in drafting several of the waste sector plans. WRAP Cymru draws on the extensive technical experience across WRAP and has advised the Welsh Government on diverse issues such as end of waste criteria and safety and use of anaerobic digestate.. Further information on WRAP Cymru's role and remit is at Annex 1.

2. WRAP Cymru's key priorities are to:

- Work with businesses in Wales to drive down the amount of unnecessary packaging and food waste
- Support the development of the infrastructure in Wales for recycling by helping businesses and markets to grow
- Increase the diversion of biodegradable waste into quality products such as compost and digestate

Our delivery is based on building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. WRAP works efficiently and cost effectively, always seeking to improve the quality of thinking, delivery and outcomes.

3. We hope that this evidence will be of use to the Committee, and would be happy to expand upon it further in oral evidence if that would be helpful.

### **Response to the Call for Evidence**

4. The Committee's call for evidence includes eight questions. We have responded to all of these in turn below.

***Q1. What contribution has WRAP made to developing Wales' recycling and reprocessing infrastructure and to developing, stabilising and promoting markets for recycled/recovered materials, and reuse of resources?***

5. In 2011/12, the activity of WRAP Cymru's Business and Markets team influenced £6.4 million sales growth in the Welsh resource recovery sector (Databuild, 2013). We estimate that this should have created 43 new green jobs<sup>1</sup>. An independent assessment and verification of the impacts during 2011/12 (the first year of the present business plan cycle) of WRAP Cymru's Business and Markets programme states:

*"The Programme has been successful in increasing capacity. Beneficiaries, predominantly SMEs in the recycling, reprocessing and manufacturing sectors, are using the support to take action as intended either to expand services and capacity through investment in tools, equipment or vehicles or to develop their business or by introducing new products and markets, with particular focus on recycled content and reduction of waste material in the production process."*<sup>2</sup>

6. The rural nature of Wales means that many businesses are small and dispersed, resulting in limited capacity for recycling and reprocessing in the more isolated communities in Wales, which are less commercially attractive to major waste management companies. The main objective of the WRAP Cymru Business and Markets programme is therefore to build capacity in Wales by supporting SMEs to be able to increase their collection service offering examples of which are capital grants for vehicles and specialist bins for source segregated collections.

7. A major criterion for success in terms of waste reduction in Wales is considered to be the creation of a closed loop economy. Alongside an increase in recycling and reprocessing capacity, the programme also aims to support businesses to improve segregation at source and thus the quality of recyclate available in the market, enhancing uptake of recyclate and so improving waste prevention and resource minimisation in Wales.

8. Evidence to support the points above is included in Annexes 2 to 4, as follows:

- Annex 2: GIS map showing delivery across Wales;
- Annex 3: WRAP Cymru's quantified impacts for 2008-2011;
- Annex 4: Projected WRAP Cymru impacts during the current Business Plan period (based on estimates provided by supported businesses);

***Q2. What actions has WRAP undertaken to address packaging and food waste in Wales?***

9. Four-fifths of food waste and associated packaging waste in the UK arises from four main sources: households, the manufacturing sector, the retail sector, and the distribution and hospitality sectors. In supporting the aims of both the waste and food strategies in Wales, WRAP is working with the relevant Welsh Government departments on a series of distinct but closely related initiatives:

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<sup>1</sup> Based on the HM Treasury assumption that for every additional £150k worth of business, one job will be created.

<sup>2</sup> Databuild (2012), Impact of activities undertaken in 2011/12: Communications, unpublished.

- The Love Food Hate Waste (LFHW) campaign – a national consumer campaign designed to promote behaviour change which addresses the issue of food waste in households;
- The Courtauld Commitment – a voluntary agreement aimed at improving resource efficiency and reducing waste within the UK grocery sector;
- The Hospitality & Food Service Agreement (HaFSA) – a voluntary agreement which supports this sector in working together to reduce food and associated packaging waste, and to increase recycling rates;
- The Hospitality, Tourism, Food & Drink (HTFD) Grant – Welsh SMEs working in the hospitality and food sectors can apply for grants of up to £50,000 towards waste prevention or recycling equipment, plus consultancy support worth up to £10,000.

10. In the last two years WRAP has worked in Wales to raise awareness of the issue of food waste and make it easier for the public and businesses to reduce their food waste. WRAP has:

- Developed and is now maintaining the consumer food waste website <http://wales.lovefoodhatewaste.com> ;
- Developed and is now maintaining the LFHW App (in English and Welsh);
- Delivered evidence, communications guidance and training for local authorities in Wales to maximise the amount of food waste collected with existing separate food waste collections;
- Started a kitchen and food skills pilot programme in Wales;
- Worked to support Courtauld phase 3 signatories deliver the target in Wales;
- Delivered 'out of home' consumer food waste research, recommendations and guidance for Welsh businesses;
- Carried out research into the food and drink wasted in Wales; and
- Embedded WRAP recommendations for shelf-life extension and food labelling changes in industry guidance around the new Food Industry Regulations, and supporting their implementation by the food industry in Wales.

11. WRAP is also working on new recommendations for engaging with single person households in Wales, and introducing the Love Food Hate Waste 'cascade' training programme in Wales, engaging with key stakeholders to 'pass on' the core messages and behaviours to consumers. This forms part of a new community-based social marketing pilot in Wales, using the proven Love Food Hate Waste 'Fresher for Longer' campaign, working alongside a key retailer, local authorities and communities. We have also just initiated a project to increase product life, extending usable time in the food loop and reducing waste in the supply chain and in the home.

12. Through the mechanism of the Courtauld Commitment, WRAP has been working with the major retailers and brands across the UK to deliver packaging reductions. Initially this focussed on the weight of packaging but in the last three years the emphasis has switched to the carbon intensity of packaging. The target for the second phase of Courtauld was to deliver a 10% reduction in the carbon emissions associated

with packaging by 2012 (from a baseline of 2009). The carbon impact was calculated using a methodology that took into account packaging weight, material recycling rates and the inclusion of recycled content in the packaging. Provisional data suggests that the Courtauld 2 target has been achieved; final figures for the 2012 recycling rates will be available in December. Since the Courtauld Commitment is a UK-wide initiative, the benefits will have been delivered across the grocery sector in Wales as across the rest of the UK.

13. In addition to the Courtauld Commitment, WRAP has been working on a number of technical projects to increase the recyclability of plastics. For example:

- The existing pigment (carbon black) used in black plastic trays is not generally detected by existing sorting equipment in Materials Recycling Facilities (MRFs), so the trays end up in the stream sent to landfill. WRAP has developed a range of alternative black pigments that can be 'seen and sorted' by MRFs and plastic reprocessors. We are hopeful that these will be adopted by retailers and brands in the foreseeable future, ensuring that such trays actually get recycled.
- At the present time, it is still not possible to recycle polypropylene used in food packaging in such a way that it can be used in food-contact applications again. WRAP has now developed a process that can produce food-grade recycled polypropylene (PP). For this to be rolled out, however, packaging that has been in contact with food needs to be clearly identifiable. WRAP is working on a solution (using a diffraction grating) which marks such packaging so that it can be automatically detected at end of life.
- These sorts of projects enable plastics reprocessors to maximise the economic value of the materials they receive by recycling it to the highest value end market, thus supporting the economic viability of the recycling sector.

These initiatives will help to create new opportunities for reprocessing industries in Wales

***Q3. How will the 'Recycling on the Go' initiative contribute to the 'Towards Zero Waste' objectives?***

14. The Recycle on the Go Wales grant scheme was launched in October 2012 since when just over £390,000 has been allocated to 19 successful applicants. The first of which to be launched was at Techniquist with the Minister for Natural Resources and Food.

15. These projects will lead to an additional 72 locations across Wales having over one thousand more recycling facilities, which we expect to divert an additional 1,590 tonnes of material to recycling over the three years of the project. The sites include two universities, six holiday parks and six local authorities, with a total of 29 new recycling sites, as well as a number of events and tourist attractions across Wales including the Hay Festival, the Millennium Centre, the Monmouth Festival and the Urdd. The project has funded three organisations to provide waste and recycling services to up to thirty

events across Wales, ensuring a consistent recycling message for the 6 million visitors these events receive annually.

16. A key part of this project has been communication tools to promote the availability and location of the new recycling containers. A range of templates are available, all using the National Recycle for Wales branding. The technical and communications guidance documents are free to download from the WRAP website<sup>3</sup>.

17. The main aim of Recycle on the Go in Wales has been to increase recycling in Wales by providing facilities for the public while they are out and about at a variety of locations. An additional expected benefit is that it should also encourage some people to recycle more at home, as well as 'on the go'.

***Q4. What work has been undertaken by WRAP to support companies working in the anaerobic digestion (AD) and compost sectors?***

18. WRAP has provided several different types of support for companies working in the AD and composting sectors in Wales. We have helped 4 companies to develop quality products through the provision of consultancy support around the requirements of the PAS 100 (compost) and PAS 110 (AD) quality standards and a further 2 companies with their business plans to develop AD facilities.

19. Using quality digestate and compost in agriculture can improve soil fertility and provides valuable plant nutrients. We are running the 'DC-Agri' (Digestate and Compost in Agriculture) field experiments programme<sup>4</sup> to demonstrate the benefits of quality compost and digestate. This programme will gather data which will enable these materials to be used more efficiently by farmers, helping to control costs and improve production.

20. A vital objective of the DC-Agri programme is to make the research results accessible to farmers and growers. A strong programme of knowledge exchange is being developed to deliver this through guidance tools, events and learning materials. A large number of agricultural colleges are directly involved, to provide both current and future farmers with the knowledge and skills to maximise the potential of quality digestate and compost to benefit their gross margins and the environment.

21. Since it started in 2010, the DC-Agri programme has so far delivered in Wales:

- Four experimental sites;
- Six training events for farmers (one in partnership with Aberystwyth University, two in partnership with Farming Connect, one in partnership with Coleg Lysfassi and Fre-energy, one with Monmouthshire Farmers Club, one for Wynnstay's team of farm advisers);

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<sup>3</sup> See [www.wrapcymru.org.uk/content/recycle-go-wales](http://www.wrapcymru.org.uk/content/recycle-go-wales) .

<sup>4</sup> For further details of the DC-Agri programme, see [www.wrap.org.uk/content/digestate-compost-agriculture](http://www.wrap.org.uk/content/digestate-compost-agriculture) .

- Four lectures for agriculture students (three in partnership with Bangor University and one with Aberystwyth University);
- Online resources for college lecturers to integrate into relevant courses; and
- Six project bulletins, providing updates on the latest project results.

22. We have also organised five 'farmer-to-farmer' training events since 2010 which are part of a programme of smaller events, aimed at supporting AD and compost operators' marketing activities to farmers.

***Q5. What has Local Authority uptake of the Collaborative Change Programme for Wales been, and is there more the Welsh Government could do to support local authorities?***

23. The Collaborative Change Programme (CCP) is a partnership between Welsh Government, the Welsh Local Government Association (WLGA) and WRAP. It is co-ordinated by a steering group consisting of the three partners. Its remit is to support local authorities to review services and put in place more sustainable and cost effective waste management services.

24. The programme has proved to be popular, with 16 of the 22 Welsh Authorities either already in receipt of, or soon to receive, support. Demand has been such that applications for support have had to be prioritised by the steering group.

25. If the Welsh Government wished to increase its support to local authorities, it might consider extending the bans that have been proposed on the disposal of certain materials (through landfill or incineration) to residual waste containers presented for collection by householders. This could result in the increased capture of target materials, leading to an uplift in recycling rates, increased income from the sale of materials for recycling, reduced disposal costs and improved efficiencies of collection. Such actions would help to accelerate the development of a circular economy in Wales.

26. Equally, the Welsh Government could indicate a firm commitment to full resourcing of the CCP for a minimum of 5 years from 2014/15, including both revenue and capital support. This would encourage all Welsh local authorities to become fully engaged with the programme; in turn, this would drive consistency, quality and efficiency of local service delivery whilst achieving national targets.

27. The support programme will be monitored and its effectiveness reported on. The Welsh Audit Office (WAO) could be invited to assess the value for money of the programme, including how much public money has been saved as a consequence of investments through the CCP.

***Q6. How is WRAP Cymru working within the wider waste prevention agenda set out by the Welsh Government in its draft Waste Prevention Plan?***

28. WRAP Cymru has been a key member of the steering group set up by the Welsh Government to develop the Waste Prevention Programme. In that role, we have facilitated several stakeholder engagement events as part of the Government's consultation process.

29. WRAP Cymru's programme is designed to support the Welsh Government's agenda on waste and resources, including waste prevention. As an example, our work has shown that 60% of Welsh households are storing unwanted clothing and shoes for later disposal or re-use, and that Welsh households dispose of 6,000 tonnes of working electrical items each year. WRAP's work on resource efficient clothing and resource efficient business models will demonstrate improvement opportunities and the case for alternative business models for these products. WRAP is also supporting the development of initiatives to increase re-use within Wales, and is discussing this with the Welsh Government.

30. The Welsh Government's draft Waste Prevention Programme also identified the food manufacturing sector as a priority. Our work suggests that food manufacturers could reduce waste by 10-15% through relatively simple, low cost changes. Our work with this sector, through initiatives such as the Courtauld Commitment, addresses this key waste stream, with potential cost savings to Welsh manufacturers of around £1,200 per tonne of food waste avoided. WRAP Cymru is also applying what we have learned from the food manufacturing sector to non-food products.

31. On re-use, our objectives for the coming year are:

- To encourage the development of markets and infrastructure for re-used and repaired products by increasing supply and quality of priority products for re-use markets from post-consumer, business and public sector waste streams;
- To encourage market demand for re-used and repaired products that have entered the waste stream; and
- To increase recycling and reprocessing infrastructure for electrical and electronic equipment (both through existing technologies and by developing new, innovative infrastructure).

32. To do this, we are undertaking the following projects:

- An outline assessment of the potential for increasing re-use in Wales under three different scenarios;
- Technical support to the Welsh Government to produce an implementation strategy on re-use and repair;
- Develop and launch UK re-use standards for priority products;
- Disseminate updated Recycled Products Guide, including Welsh-specific re-use & repair organisations, to key audiences in Wales;
- Encourage the increase in levels of re-use and repair activity for priority products;
- Encourage improvement in stock management for priority products within re-use organisations;

- Support pilot projects to encourage the increase in re-use and repair infrastructure across Wales;
- Commissioning Welsh trials on a geographical basis for mattress recycling and re-use;
- Integrating re-use into sustainable procurement work by Value Wales and others; and
- Working with the Welsh Government to promote the re-use and recovery of critical raw materials.

***Q7. What is the likely impact of Defra funding cuts to WRAP at the UK level on the capacity of WRAP Cymru to achieve its objectives?***

33. Defra’s funding for WRAP is over £15 million for the 2014/15 programme. This is a significant level of funding which will enable WRAP to focus its work on the key priorities in England regarding the future sustainable use of resources.

34. WRAP Cymru has received the Welsh Government’s strategic steer for 2014/15 and is currently drawing up a programme proposal for delivery which includes resource allocation from the central WRAP team in our Banbury headquarters for specific technical and professional expertise. A dedicated delivery team with the necessary skills and expertise will be based in Wales focussed on the delivery of the WRAP Cymru programme.

***Q8. How effective is WRAP guidance, dissemination of good practice, communications and customer interface?***

Our approach

35. WRAP works in partnership with government, industry and local authorities, sharing evidence-based, tried-and-tested good practice advice, guidance and communications materials. This low-cost collaborative approach means that the impact of our work is far greater than if we were to work in isolation or collaborate with one sector alone and enables us to reach many more people at a minimal cost.

36. We use a diverse range of channels for communicating with our customers, who include our funders, businesses, councils and individuals. We only undertake communications or engagement activity which contributes to the delivery of our organisational, and ultimately our funders’, objectives, and for which there is a clear business need.

37. We have an evidence-based approach to communications, and endeavour to place evaluation at the heart of our work. In particular, we regularly request customer feedback to help us in our aim of continuous improvement. We recognise that there are often multiple drivers to behaviour change, and that it is not always possible to attribute a change directly to communications alone.



## Our impact

38. Examples of the effectiveness of our guidance, dissemination of good practice, communications and customer interface include:

- Since its launch in March 2009, the On-Pack Recycling Labelling scheme<sup>5</sup>, which helps consumers choose the appropriate recycling method (developed using WRAP's Recycle Now brand and managed independently by OPRL Ltd), has been adopted by more than 75,000 product lines.
- In 2010-2011 the WRAP website supported £16 million annual cost savings to businesses UK-wide, and annual sales growth driven by information accessed from the website of £50 million<sup>6</sup>.
- In Wales we were charged with raising awareness of the benefits of recycled content and resource efficiency among manufacturing SMEs. We reached 1,485 direct contacts (against an external target of 306) and provided training to 98 (against a target of 22) as part of the European Commission funded ReMake eco-innovation voucher scheme<sup>7</sup>.
- Our work to change consumer behaviour and support local authority collections influenced an increase in the UK-wide recycling rate of plastic bottles from 5 per cent in 2000 to 48 per cent in 2011<sup>8</sup>.
- Communications activity around our WEFO funded Accelerating Reprocessing Infrastructure Development (ARID) programme of capital funding for SMEs in Wales' Convergence Region has been central to our over-delivery of the programme to date. A £39,000 communications and engagement spend has helped generate successful applications worth £4 million to end September 2013, which are estimated to create 139 new jobs and result in 464,000 tonnes of waste prevented, reused or recycled<sup>9</sup>.

## **Submitted by:**

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<sup>5</sup> See [www.wrap.org.uk/content/pack-recycling-label](http://www.wrap.org.uk/content/pack-recycling-label).

<sup>6</sup> Databuild (2012), WRAP Impact Model 2010-2011, unpublished.

<sup>7</sup> European Commission (2013), ReMake Final Publishable Report Summary.

<sup>8</sup> WRAP (2012), Closing the Loop: WRAP's Contribution to Economic Growth.

[www.wrap.org.uk/sites/files/wrap/WRAP%20contribution%20to%20economic%20growth\\_0.pdf](http://www.wrap.org.uk/sites/files/wrap/WRAP%20contribution%20to%20economic%20growth_0.pdf).

<sup>9</sup> WRAP estimates.

### About WRAP Cymru

39. WRAP (the Waste & Resources Action Programme) is an independent, not-for-profit company, recognised in the UK and internationally for our expertise in resource efficiency and product sustainability, our leading-edge evidence, our skills and knowledge and our ability to bring people together to solve problems.

40. WRAP's vision is: 'A world where resources are used sustainably.'

41. We occupy a unique space as a trusted interface between Governments, business, local authorities, communities and organisations working for more sustainable resources.

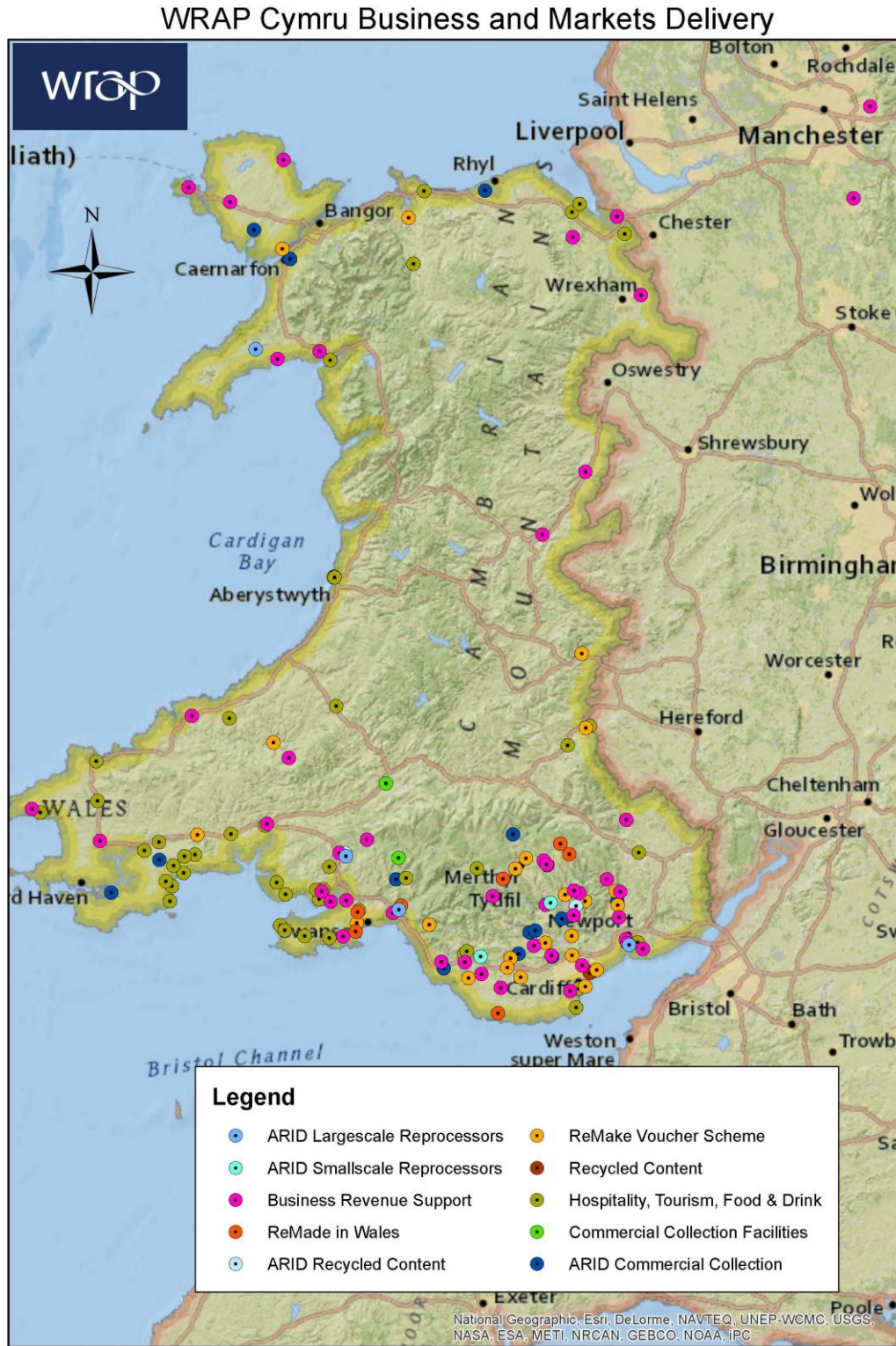
42. WRAP acts as a catalyst, accelerating change in the behaviour of business and communities in ways that neither governments nor individual companies can do, working on their own.

43. We do this through a combination of:

- Technical knowledge and the ability to apply that knowledge;
- An ability to forge partnerships and build alliances;
- Developing insights into business and consumer attitudes and behaviour;
- Research and a developing evidence base.

44. Our delivery is based on carefully building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. Tackling these, in the right order and cost effectively, is essential to effective market operation and is at the heart of the way WRAP operates.

GIS Map showing WRAP Cymru's delivery across Wales



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### WRAP Cymru's quantified impacts for 2008-2011

45. The achievements of WRAP Cymru in our first business plan period ending in March 2011 are shown in **Error! Reference source not found.** below. These figures have been assessed and externally verified. Impacts and targets are expressed as 'per annum at the end of the business plan period'.

**Table 1: 2008-11 Quantified annualised impact against targets**

<b>Indicator</b>	<b>Target</b>	<b>Impact (per annum)</b>	<b>Result</b>
Waste diverted from landfill	175,000	411,000	Exceeded
CO <sub>2</sub> e emissions avoided	90,000	280,000	Exceeded
Cost savings	£32 million	£78 million	Exceeded
Sales growth	£1 million	£7.6 million	Exceeded
Economic benefits	£33 million	£85 million	Exceeded

46. During this period WRAP Cymru's Business and Markets team worked directly with 48 businesses.

### WRAP Cymru's projected impacts during the current (2011-2015) Business Plan period

47. The table below shows WRAP Cymru's achievements during this business plan period to date. These figures are based on estimates, provided by supported businesses, of the likely impact of our support and must therefore be treated with caution.

**Table 2: Expected impact projected from Business & Markets work contracted to date (2011-2015 Business Plan)**

<b>Indicator</b>	<b>Expected Impact</b>
Waste diverted from landfill (biodegradable only)	625,770 tonnes
CO <sub>2</sub> e emissions avoided	786,000
Cost savings	£634,000
Sales growth	£63.4 million <sup>10</sup>

48. During this business plan period WRAP Cymru's Business and Markets team worked directly with 95 businesses (49 in 2011/12 and 46 in 2012/13). In the last five years, WRAP Cymru has worked with a total of 143 businesses.

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<sup>10</sup> Since this is a self-reported figure, we would expect it to be an over-estimate, but provide it here in good faith.