



## Mayor & Cabinet

### Draft Waste Strategy

**Date:** 8th December 2021

**Key decision:** Yes.

**Class:**

**Ward(s) affected:** All

**Contributors:** Wendy Nicholas, Strategic Waste & Environment Manager

### Outline and recommendations

The purpose of this report is to present the final draft Waste Management Strategy following the public consultation that was held during July - October.

It is recommended that Mayor and Cabinet note the contents of this report and adopt the Waste Management Strategy 2021/31

### Timeline of engagement and decision-making

- |  |                          |
|--|--------------------------|
| • Report to Sustainable Development Scrutiny Committee   | June 2021                |
| • Report To M&C on draft waste strategy and approval to consult with the public                  | July 2021                |
| • Launch Public Resource & Waste Strategy consultations and engage with residents and businesses | July to October 2021     |
| • Waste Management Policy Development with Members   | July to October 2021     |
| • Collate feedback from consultation and events  | October to November 2021 |
| • Equality Impact Assessment following consultation  | October to November 2021 |
| • Report back to Mayor and Cabinet with findings   | December 2021            |
| • Adoption/Rollout of Waste Strategy and Delivery Plan   | January 2022 onwards     |

## **1. Summary**

- 1.1. This report presents the Council's Waste Management Strategy 2021-31, (appendix A) for approval by Mayor and Cabinet. It details the Council's priorities and sets the future direction for waste and recycling across the borough.

## **2. Recommendation**

- 2.1 It is recommended that Mayor and Cabinet:
- Note the results of the public consultation carried out on the draft Waste Management Strategy
  - Adopt the Waste Management Strategy 2021/31

## **3. Policy Context**

- 3.1. The Government's Resources and Waste Strategy published in 2018 builds on the commitments detailed in the 25 Year Environment Plan. The Strategy contains five strategic ambitions:
- to work towards eliminating food waste to landfill;
  - to double resource productivity;
  - to work towards ensuring all plastic packaging placed on the market is recyclable, reusable, or compostable;
  - to eliminate avoidable waste of all kinds;
  - to eliminate avoidable plastic waste.
- 3.2 In May 2018, the Mayor of London published his London Environment Strategy (LES). The Strategy sets out objectives, targets, and policies for the effective management of London's municipal waste and to accelerate the transition to a circular economy. The Strategy's waste objectives, targets, and minimum service levels for London are:
- Objective 7.1 - Drive resource efficiency to significantly reduce waste focusing on food waste and single-use packaging
  - Objective 7.2 – Maximise recycling rates
  - Objective 7.3 - Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants)
  - Objective 7.4 - Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

London-wide targets:

- To cut food waste and associated packaging waste by 50% per person by 2030
- To achieve a 65% municipal waste recycling rate by 2030, including a 50% recycling rate for local authority collected waste (LACW) by 2025, 75% recycling rate for commercial waste by 2030 and 45% recycling rate for household waste by 2025
- To send zero biodegradable or recyclable waste to landfill by 2026

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- London to manage net 100% of all the waste it produces by 2026
- 3.3 Strategy Proposal 7.2.1.a (LES) sets a minimum level of service for household waste recycling that waste authorities should deliver by 2023, being that all properties with kerbside recycling collections are to receive a separate weekly food waste collection service and all properties to receive a collection of, at a minimum, the six main dry materials, glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs, and trays).
- 3.4 All waste authorities in London have a legal duty to perform their waste functions in general conformity with the waste provisions of the Mayor's 2018 London Environment Strategy (LES). Whilst Lewisham's Waste Strategy is a non-statutory document, it seeks to guide future action. The Mayor of London had previously signed off Lewisham's first Reduction and Recycling Plan (RRP) in 2019/2020 as being in general conformity with the waste provisions in the LES. That RRP (the submission and mayoral approval of which, is a requirement of the LES) laid out household waste recycling targets in line with both the LES and what independent modelling suggests is the upper limit of what is achievable in Lewisham as well as service provision in line with both the LES's minimum service requirements and indeed broader good practice.
- 3.5 The Council's corporate strategy 2018-2022 details seven priorities, one of which is to ensure that we contribute towards making Lewisham greener so that everyone can enjoy our green spaces and benefit from a healthy environment as we work to protect and improve our local environment. Efficiently dealing with the waste produced within the borough will help the Council to deliver this outcome.
- 3.6 In February 2019 Lewisham Council declared a climate emergency. The Council must take action to achieve its goal of carbon neutrality by 2030. This requires looking at all aspects of the Council's work, including waste management.

## 4. Background

- 4.1 The Council's previous waste strategy expired in 2010/11 and since that time the legislative framework surrounding waste management has changed considerably with the UK Government and the Mayor of London driving the agenda towards a more sustainable and circular economy. This has resulted in challenging targets being set at both regional and national levels.
- 4.2 Moving towards a circular economy would have huge benefits to our environment, communities and the local economy. Circular economies use less energy, water and non-renewable resources; produce less pollution and greenhouse gases. A circular economy model has the intention of designing out waste and is based on the idea that there is no such thing as waste. In order to achieve this, products are designed to last and optimised for a cycle of disassembly and reuse that will make it easier to handle and transform or renew them.
- 4.3 Although 'recycling' is cited as the key activity in relation to sustainable waste management, Lewisham operates within a broader regulatory framework. The Waste Hierarchy (shown in this diagram) dictates how we should structure our services and focus attention on those activities at the top of the diagram, with the least amount of waste going for disposal at the bottom of the upturned pyramid.

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- 4.4 Development of this Waste Strategy follows Lewisham's Reduction and Recycling plan which was approved at Mayor and Cabinet December 2019 and by the Mayor of London February 2020, and includes local reduction and recycling targets that contribute to the Mayor's London wide targets for 2022 and 2025. It also links to the Medium Term Financial Strategy saving proposal of £250,000, F-16, which was approved by Mayor and Cabinet on 9<sup>th</sup> December 2020
- 4.5 The overall objective for the Waste Strategy is to manage waste sustainably and to contribute to the Council's priorities, one being to successfully make Lewisham greener, which involves taking better care of our local environment and the planet.
- 4.6 The Strategy sets out six aspirational key policies and service changes that are needed to support the delivery of the improvements as well as behavior change and incentives that are required. The key policies are set out in detail in section 6.
- 4.7 A draft Waste Management Strategy was presented to Sustainable Development Select Committee in June 2021, where several recommendations were raised. Officers responded to the recommendations the Committee raised in October 2021. The recommendations and responses are set out in section 14 of this report.
- 4.8 Approval was sought at Mayor and Cabinet in July 2021 for the commencement of the public consultation on the Waste Management Strategy.

## 5. Consultation

- 5.1 The public Waste Strategy consultation commenced on Friday 23<sup>rd</sup> July 2021 and ran for 14 weeks closing on the 29th October 2021. Following the closure of the consultation three focus groups were held. The consultation aimed to present the key priorities set out in the Waste Management Strategy and obtain feedback from as many stakeholders as possible.
- 5.2 A comprehensive communication strategy was put in place to support the consultation exercise. Listed below are some of the communication methods that were used to promote the Waste Strategy and consultation:
  - Posters were displayed around the borough on the Council's JC Decaux boards.
  - Additional JC Decaux boards were rented in high footfall areas such as Lewisham Shopping Centre, Lewisham rail station, and Hither Green station.
  - Posters were also displayed at areas such as park entrances, shops, and restaurants.

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- Social media activities – The consultation portal was promoted online through the Council’s website and social media channels.
- Staff promoted the consultation through email signatures.
- E-newsletters were sent to over 35,000 residents at different times during the consultation period

### 5.3 Waste Management Strategy Consultation Results:

- 5.3.1 The results of the online consultation and the focus groups are detailed below. The full results of the consultation can be found in Appendix B.
- 5.3.2 We received comments from more than 1,700 respondents and the overall response was positive and supportive, and we now have a clearer idea of what people who use our services want.

Of those that responded to the survey and provided the relevant information:

- *Approximately three-quarters (74.62%, 1270) were of White ethnicity (58.17% were White British)*
- *Over 58% were female (1004)*
- *Over half (61.16%, 1041) were aged between 30-54 years*
- *Over 10% (10.16%, 173) considered themselves to be disabled*

5.3.3 Detailed below are key questions from the consultation and responses from stakeholders.

- **Response:** Over 79% of respondents agreed with the 45% recycling/reuse/composting target for household waste.
- **Action:** The 45% target is included within the waste strategy, and in the Council’s Reduction and Recycling Plan.
- **Response:** 74% of respondents disagreed or strongly disagreed with providing smaller bins for general waste.
- **Action:** The Council will not be looking to provide smaller bins for general waste at this time.
- **Response:** 80% of respondents feel that we should continue to promote home composting.
- **Action:** This has been included within the waste strategy under Priority 2, the Council will “ensure that recycling and composting is easy” by “providing user-friendly services”.
- **Response:** 92% of respondents feel that the Council should minimise the waste produced from its office buildings.
- **Action:** Council buildings will be required to develop responsible waste management action plans as part of the safe return to the office after the pandemic, as included under Priority 1.
- **Response:** 94% of respondents felt that businesses should separate waste for recycling.
- **Action:** The Council will ensure that businesses have access to appropriate waste disposal services, and will work to develop, implement and publicise a waste management policy as described under Priority 3.
- **Response:** 91% of respondents felt that there should be a greater range of acceptable materials collected for recycling at the CA Site.
- **Action:** The Council will commit to carry out a search of potentially available Council-

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owned land/properties to see if there is anywhere available to set up another reuse and recycling site. There is currently no financial resource to support this but if anywhere suitable is found, a feasibility study will be undertaken. By increasing the size of the reuse and recycling centre, the Council will be able to accept more items for disposal.

- **Response:** 69% of respondents felt that the council should develop and promote initiatives or reward schemes.
  - **Action:** The Council will look to investigate opportunities as the waste strategy develops over the next 10 years to introduce incentive schemes.
  - **Response:** 92% of respondents believe that there should be more information on what can and cannot go in the bins.
  - **Action:** The Council will review how we can improve distribution of relevant information and guidance on responsible waste management to residents and businesses, as described.
  - **Response:** 78% of respondents disagreed or strongly disagreed that residual waste collections should reduce to collections every three weeks.
  - **Action:** The Council is not considering reducing the frequency of collections at this stage. The waste strategy will have periodic reviews that will include any potential service developments or changes. These will be presented to Mayor and Cabinet where appropriate.
  - **Response:** 53% of respondents felt that it was very important/important that penalty notices were issued to residents that continually contaminated their bins.
  - **Action:** The Council will look to target through engagement, education and enforcement to improve recycling and reduce contamination, as described under Priority 2.
  - **Response:** 84% of respondents felt that it was important/very important to run more promotional campaigns to schools and households to encourage waste reduction.
  - **Action:** The Council will review the methodology and strategy used for promoting waste reduction to ensure engagement, education and encouragement with those who use the Council's services is appropriate.
- 5.4 The key findings gathered from the public consultation have been incorporated into the final version of the strategy by re-working the priorities to accommodate resident and member views. The Council's intentions are set out in the final version of the strategy.
- 5.5 The Council will review the methodology and strategy used for promoting waste reduction to ensure engagement, education and encouragement with those who use Council services is appropriate. We will develop a policy for the collection of waste and recycling from individual properties and flats that will provide education and encouragement to help reduce waste and boost recycling. The policy will also highlight the potential for warnings and fines for those who continue to put rubbish into recycling bins. We will explore affordable options to collect other recyclable items such as textiles and small electrical items. We will also review how we can improve the distribution of relevant information and guidance on responsible waste management to residents and businesses.
- 5.6 The Council's Waste Strategy takes a progressive, long term and incremental approach over the next decade with periodic reviews to enable us to consider what might need to change. As set out in the waste strategy, the Council will periodically review our services with the support of the Sustainability Development Select Committee to help us identify challenges and opportunities to improve performance – particularly in waste reduction and recycling. In particular, the Council will review the Waste Management Strategy annually, and carry out a review every four years (or as required) with the view to present any changes to Mayor and Cabinet.

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## 6. Waste Management Strategy

- 6.1 The Council's ambition is to seek out and work with all partners in Lewisham to limit waste to a minimum, be innovative and show leadership to move towards a circular economy and regenerative economy that benefits the environment, local businesses, and communities.
- 6.2 The Council wanted to understand the level of participation and the composition of materials in Lewisham kerbside collections. Earlier this year, Lewisham commissioned M-E-L Waste Insights to carry out a compositional survey and participation monitoring to assess the set-out and participation rate of the dry recycling, food waste, and garden waste collection and evaluate the number of specific materials collected in the kerbside bins that could potentially be collected separately for recycling at the kerbside.
- 6.3 The compositional survey finished May 2021. The survey identified that in total 57.7% of residual waste collected could have been recycled alternatively at the kerbside, with food being the main material in the residual bin. Over the survey, 74% of households presented their mixed recycling bin for collection. 27.7% of recycling waste collected from all properties was classed as contamination.
- 6.4 The participation monitoring for organic waste finished October 2021, recycling finished November 2021. Overall, 75% of householders participated in the food waste collection. This means that 75% of householders set out their bin or caddy at least once during the monitoring period. Only 21% of households set out their food waste bins for each weekly collection.
- 6.5 Participation in the garden waste collection was much lower. However, it should be noted that this may be due to seasonal factors in gardening behaviour. Around one-fifth (19%) of households participated in garden waste collection over the monitoring period, Only 11 households (1%) participated in weekly collection.
- 6.6 The Council has defined six priorities for its waste management service, which are set out below with a summary of the work we aim to achieve to meet these key priorities:

		What we intend to do
Priority 1	Leading the way forward	Establish a team of Green Champions, including staff and community volunteers to become waste and recycling ambassadors to support waste reduction.
		Demonstrate leadership to influence others through using circular economy principles in the way we manage our estates, facilities, and public spaces.
		Achieve the targets set in the Lewisham Reduction and Recycling plan that will help contribute to the Mayor of London's Environmental Strategy targets
		Enforce against the minority who engage in anti-social behaviour including irresponsible waste management to the detriment of local people/neighbourhood
Priority 2	Shaping services to	We will continue to seek and apply for new funding to support new initiatives and innovation

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	<b>follow the Waste Hierarchy</b>	<p>We will develop, implement and promote a responsible waste management policy that will explain why waste reduction, recycling, and reuse are so important in helping to reduce the impacts of climate change, reduce cost, and what action may be taken to tackle irresponsible waste management.</p> <p>We will improve and promote opportunities for increased recycling and reduction of illegal dumping to businesses within the borough. We will look into the feasibility of offering a food waste collection service.</p> <p>We will review the opportunities for signage attached to street furniture/columns advertising the correct collection/disposal method for flats above shops and businesses and the penalties for breaching the requirements.</p> <p>We will continue to work with landlords and partners who manage private and social housing estates/blocks to improve waste management.</p>
<b>Priority 3</b>	<b>Working together for an improved local environment</b>	<p>Using a combination of service design, education, partnership working, and enforcement, where necessary, to encourage positive behaviour change with regards to responsible waste management and cleanliness</p>
		<p>Improve the presentation of waste on collection days through the creation of new service standards, to prevent littering, the prompt removal of waste containers after collection to aid safe passage along the public highway</p>
		<p>We will provide engagement, education, encouragement before proportionate enforcement action is taken against those who are responsible for continued contamination of recycling containers, untidy front gardens, and poorly managed bin areas.</p>
		<p>Collaborate and support local community groups and relevant organisations to discuss, develop and implement projects that underpin working together to improve local environmental quality and responsible waste management.</p>
		<p>Develop performance indicators for local environmental quality and conduct periodic audits to assess the cleanliness of the street environment and report findings.</p>
<b>Priority 4</b>	<b>Using waste as a resource following the Circular Economy Principles</b>	<p>We will investigate the possibility of opening a reuse shop/stall to help reduce the amount of waste being disposed of.</p>
		<p>We will apply for funding to improve doorstep collections for items such as Waste electrical and electronic equipment (WEEE), coffee pods, and textiles.</p>
		<p>We will continue to support national and regional efforts through increased reuse activities, encouraging the use of recycled goods, composting and food waste recovery with the continued generation of energy from residual waste.</p>

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		Investigate the possibility of introducing community composting and will undertake a feasibility study to determine the best approach and suitable locations.
Priority 5	<b>Reducing carbon emissions, decreasing energy waste, and improving air quality</b>	To contribute to better air quality in Lewisham and London by adhering to the Lewisham Air Quality Action Plan and reducing net carbon emissions from waste management activities by reducing vehicle movement, utilising cleaner fuel options, and reducing the overall carbon footprint of our waste management activities.
		To meet the Council's target to be a carbon neutral borough by 2030
		Comply with the Mayor of London's vision to become a zero-carbon city by 2050
		Seek to ensure that municipal waste is managed within the London region, wherever appropriate facilities exist, to mitigate the impacts of climate change from the transportation of our waste.
Priority 6	<b>Adding Social Value</b>	We will continue to deliver and promote responsible waste management through local outreach events and the Cleaner Lewisham/responsible waste management behaviour change programme, and working with partners, residents, and the voluntary sector, add to the social cohesion and sense of community in schools, estates, and communities.
		Offer temporary placements within the Street Environment Services support team at Wearside Road Depot under the Councils Kick-start initiative – The purpose of the Kick-start initiative is to get unemployed 16–24-year-olds into employment so that they can gain work experience to better prepare them for work opportunities
		Signpost our contractors to local businesses for goods and services, encourage them to promote apprenticeships, vacancies, and opportunities for local employment, and promote networking opportunities for mutual benefit

- 6.7 An increased focus on improved engagement, communication, and education with residents, businesses, and visitors to the borough is essential to encourage positive behaviour change. The need to work closely with registered social landlords, managing agents, private landlords, and housing associations is key to encouraging waste reduction and the correct disposal of waste where applicable.
- 6.8 A key and early priority for the Waste Strategy is an early review to reflect on and incorporate the large-scale changes coming through the requirements of the government's consistency package through the new Environment Bill.
- 6.9 The Strategy covers the period 2022-32, with the expectation to review every four years. Due to the number of actions arising within the plan and Strategy, officers will develop a reporting tool, extracting the relevant measurements from the Strategy to outline progress on the work undertaken.

## 7. Risk Management Implications

- 7.1 As detailed in this report the Council's previous Waste Strategy expired in 2010/11.

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Since that time the legislative framework surrounding waste management has changed considerably with the UK Government and the Mayor of London driving the agenda towards a more sustainable and circular economy. This has resulted in challenging targets being set.

7.2 The key areas of concern:

- The Government launched its 25 Year Environment Strategy in January 2018. This was followed by the Resources and Waste Strategy in December 2018. The Resources and Waste Strategy is an ambitious document requiring significant change. As part of the strategy, DEFRA launched consultations into three key areas
  - o Consistency in Household and Business Recycling Collections in England.
  - o Reforming the UK Packaging Producer Responsibility System (EPR)
  - o Introducing a Deposit Return Scheme (DRS) in England, Wales, and Northern Ireland

At the same time, Treasury launched a consultation into a Plastic Packaging Tax.

- 7.3 Though consultations closed June 2021, it is still not clear what impact these may have on the Council's proposed strategy and waste management services. However, ensuring the focus of the Strategy remains on the waste hierarchy, sustainable good practice, cost efficiency, and meeting the needs of the local community, the service can somewhat mitigate the potential impacts of changes to the legislation.
- 7.4 The anticipated population growth will result in increased total annual tonnages on municipal waste arising, increasing pressure on future services and the resources needed to deliver these services and the Council's budget. To help mitigate the impact of population growth on the quantity of waste the Council will have to manage, the Strategy incorporates a greater focus on waste minimisation and behaviour change.
- 7.5 It is generally accepted that recycling is more difficult for residents in flats and there is a high proportion of flats in the borough. The number of flats expected to be developed over the coming years means that achieving recycling levels comparable with outer London boroughs with a lower proportion of flats will be challenging. To help mitigate the issue Lewisham have created a waste management guidance document for architects and property developers. The Council encourages sustainable building and retrofitting whenever possible. The new Lewisham Local Plan that was recently subject to consultation reflects this approach through three policies: Section 2 (Sustainable Design), Section 11 (Reducing and managing waste) and Section 12 (Design to support the circular economy).

## 8. Financial implications

- 8.1 This report is asking Mayor and Cabinet to adopt the 2021/31 Waste Management Strategy.
- 8.2 The implementation of the strategy and any communication campaigns will be managed within existing budgets and there are no additional financial resources required. The implementation of this strategy is directly linked to the delivery of budget savings in 2023/24, approved by Mayor and Cabinet in December 2020.

## 9. Legal implications

- 9.1 The Strategy is a non-statutory document that details the Council's priorities and sets the

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future direction for waste and recycling across the borough. The Council has a variety of legal duties and powers in relation to waste and recycling. The legal implications of taking implementing measures set out in the strategy will be addressed at that time.

- 9.2 In taking this decision, the Council's public sector equality duty must be taken into account. It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 9.3 In summary, the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; foster good relations between people who share a protected characteristic and those who do not.
- 9.4 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made bearing in mind the issues of relevance and proportionality and understanding the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 9.5 The Equality and Human Rights Commission (EHRC) has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance. The Council must have regard to the statutory code in so far as it relates to the duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found on the EHRC website.
- 9.6 The EHRC has issued five guides for public authorities in England giving advice on the equality duty. The 'Essential' guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice.

## **10. Equalities implications**

- 10.1 An Equalities Analysis has been carried out in relation to the Waste Management Strategy to identify any evidence or views that suggest that different equality or other protected groups could be adversely and/or disproportionately impacted by the proposal.
- 10.2 The majority of the proposals will make a positive impact on the Borough, which will be beneficial for all, regardless of their background.
- 10.3 The Assessment is attached to this report in Appendix C

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## **11. Climate change and environmental implications**

- 11.1 The Council's waste management services contribute to the protection of the environment and protecting human health through the effective management of waste arising in the borough.
- 11.2 Moving waste up the waste hierarchy i.e. by ensuring a greater quantity of waste is re-used or recycled as opposed to being disposed of as residual waste, contributes to the Council's efforts to mitigate the impacts of climate change by reducing the carbon footprint of the Council's waste management services.
- 11.3 Through the implementation of the Waste Management Strategy and delivery of future waste management services the Council will ensure the in-house service contributes to the Council's sustainability agenda by ensuring the vehicle fleet meets the latest emissions' limits specifications and detailed improvement plans are in place for contributing to a greener environment.

## **12. Crime and disorder implications**

There are no direct crime and disorder implications associated with this report.

## **13. Health and wellbeing implications**

There are no direct health and wellbeing implications associated with this report.

## **14. Background papers**



SDSC  
Recommendations.pdf

## **15. Glossary**

No specialist language is used in this report.

[Link to Oxford English Dictionary here.](#)

Term	Definition
Circular Economy	An economy where we keep resources in use for as long as possible, extract the maximum value from them while they are in use, then recover and create new products and materials when they are no longer used.
Waste Hierarchy	A ranking system used for the different waste management options according to which is the best for the environment. The most preferred option is to prevent waste, and the least preferred choice is disposal in landfill sites.
WEEE	Waste electrical and electronic equipment

## **16. Report author(s) and contact**

Wendy Nicholas, [Wendy.Nicholas@Lewisham.gov.uk](mailto:Wendy.Nicholas@Lewisham.gov.uk), 020 8314 2194

## **17. Appendices**

Appendix A – Draft Waste Strategy

Appendix B – Consultation Results

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## Appendix C – Equalities Analysis

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