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Making ends meet Maximising the value of waste

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The government has set itself the goal of delivering a ‘zero-waste economy’, in which all waste resources are fully valued – financially and environmentally. Aligning these two outcomes within the current waste policy review will be key to delivering the long-term certainty business needs to play its part in meeting waste policy objectives for 2020 and beyond. But the government risks missing the full potential of this opportunity.

The UK has binding targets to reduce municipal waste to landfill by 35% and to recycle at least 50% of household waste by 2020. These drivers alone will require an estimated £10bn investment in around 2,000 new waste management plants, as 300 of the UK’s largest landfill sites have to close. The waste policy we choose could also unlock new opportunities for example by helping councils reduce their budgets and share their workloads.

This is an area where the government can demonstrate greater integration of policy, recognising waste as a valuable resource and at the same time showing how tackling one problem in the right way can deliver the solution on a range of fronts to deliver a green economy.

The recent CBI brief *Going to waste: making the case for energy from waste* argued that waste has a significant role to play in the UK’s response to demanding targets to reduce greenhouse gas emissions and increase the contribution of renewable, low-carbon and secure energy sources. We also need the waste policy review to embrace this level of ambition.

This brief identifies the main challenges to achieving a ‘zero-waste economy’ and offers recommendations to deliver on the zero-waste objective. It argues that:

- Only a fully integrated approach to waste policy will deliver a zero-waste economy
- Planning and finance barriers must be tackled
- Achieving zero waste requires smarter regulation and fairer and better enforcement.

Only a fully integrated approach to waste policy will deliver zero waste

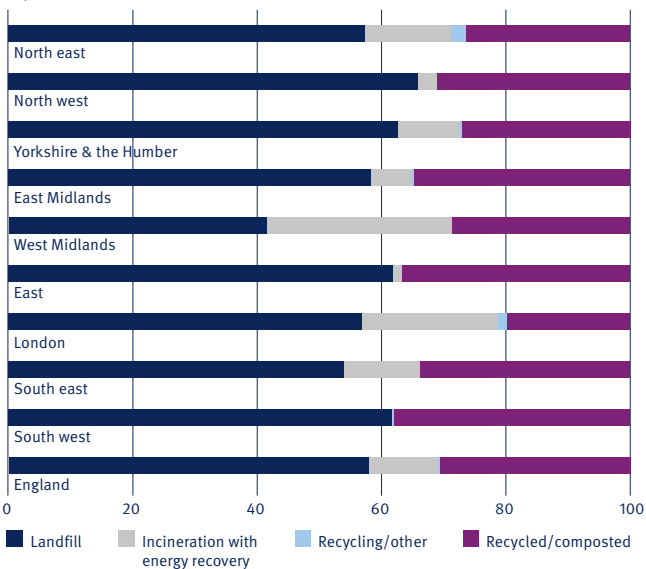
The review of waste policies is a real chance for England to harness the value of waste as a resource

There have been substantial improvements over the last decade in how we manage waste in the UK, particularly municipal waste. In 2000-01, households were on average recycling around 14% of their waste. In 2008-09 this had increased to around 37%. Over the same period, the amount of municipal waste sent to landfill fell from 78% to 50%.¹ And there have been improvements in other sectors: for example, some 28% of all construction aggregates used in 2009 were recycled materials – an increase from 10% in 2000.²

But at a sub-national level the picture is much more diverse with some areas of the country doing better than average – such as the West Midlands, and others falling below average – such as the north east (Exhibit 1). While the Welsh and Scottish devolved administrations have both recognised the need to do more and have developed zero-waste plans, the government’s response to delivering waste policy objectives in England and across the UK more broadly is increasingly complex and difficult for businesses to manage.

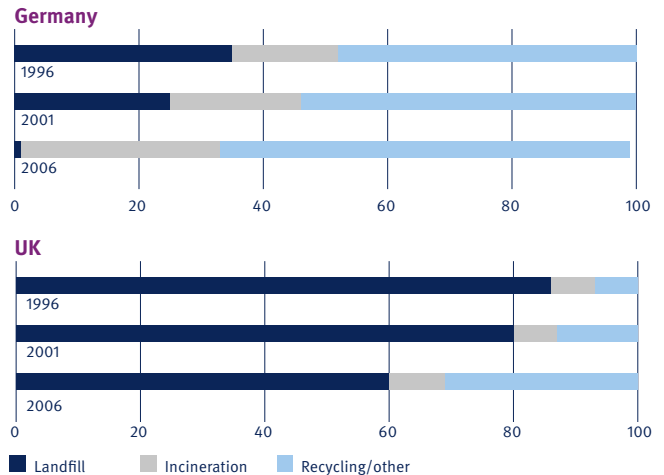
The government’s commitment to review waste policies in England to achieve a zero-waste economy is therefore welcome – especially if we look at UK performance compared to others in Europe. Germany had a 66% recycling rate in 2006, with 32% comprising residual waste put through energy recovery treatments and the remaining 1% being sent to landfill (Exhibit 2).

Exhibit 1 Method of municipal waste management by region, 2006/07 (%)



Source: Eurostat Statistics yearbook 2008/2009

Exhibit 2 Germany and UK waste management statistics (%)



Source: Eurostat statistics yearbook 2008/9

Approaches to waste management in other countries may not be appropriate for the UK, but it is clear we have a great deal of potential to harness.

The waste review should be coordinated across government and focused on delivery

There are a number of EU and national policy drivers, originating at EU and national level, that will continue to drive change. As the government looks to review England’s waste policies, existing waste policy drivers and targets should not be seen in isolation though. It is widely recognised that waste policy must play a role in meeting our commitment to a 34% reduction of greenhouse gas emissions by 2020, as well as the UK’s 20% renewable energy target for 2020. In addition, there is a growing debate about resource efficiency and sustainable materials management that will become increasingly central to waste management. The aim of the waste policy review should therefore be to deliver a progressive, integrated strategy on waste policy, with shared understanding and greater coordination between waste policy and the government’s other strategic objectives.

The CBI believes that with a technology-neutral policy environment, it is feasible to quadruple the current percentage of UK electricity produced via energy from waste, from 1.5% of the UK’s total electricity requirements to 6% by 2015, without affecting the UK’s ability to deliver high levels of recycling. With this in mind, and in line with government’s review of National Planning Policy Statements, the waste review should determine an appropriate level of ambition for energy generated from waste. Government departments must work closely as conflict and ambiguity between waste policies and national renewable energy policies will damage our ability to deliver the broader energy and resource efficiency agenda.

This will require determination from the government, with DEFRA, DECC, BIS, DCLG and HMT working together to deliver a more integrated approach. We very much support the initial cross-governmental nature of the review so far and recommend this dialogue is strengthened and continues beyond the lifetime of the review.

Another measure of success for the review will be the delivery of a progressive National Waste Management Plan, as required by the revised 2009 EU Waste Framework Directive. The Waste Strategy for England 2007 did not result in robust concrete action. To ensure this review builds on the momentum of the coalition government's ambition to be the 'greenest government ever', a coherent delivery plan will be essential for the waste management sector to understand how the future policy framework will be shaped.

Only this level of long-term and detailed thinking will ensure we have the right investments to deliver on all the government's ambitions on waste, climate change and resource and energy security. In particular, it will enable industry to make immediate decisions about the waste processing infrastructure required over the coming decades.

Achieving zero-waste means implementing a diverse range of waste and resource management options

The appropriate route to achieving the government's ambition of a zero-waste economy depends on the physical make-up of waste. The options for delivering maximum resource value from organic, biodegradable waste (such as energy recovery) should be clearly distinguished from hard recyclables which are more easily applied to preventative design, reuse and recycling.

In all cases, extracting the maximum value from waste can depend on several factors – including the composition and quality of the waste, climatic conditions and the collection and transport facilities available. For example, anaerobic digestion (AD) has an important role in turning organic waste into a valuable resource, but it is the appropriate technology for only a portion of the total residual waste produced. The CBI urges an approach that promotes the most appropriate technology or solution on a case-by-case basis, so that waste management treatments offering greatest overall environmental and economic value are implemented. For more information on the family of energy-from-waste technologies, see the CBI report *Going to waste: making the case for energy from waste*.

Understanding our waste better will help deliver zero waste

The 2007 England Waste Strategy highlighted the importance of reducing the amount of waste generated by commerce and industry (C&I), and the government has since identified that a key part of future waste policy development should be in achieving greater convergence in policy between C&I waste and household waste.³ The CBI encourages this

approach, as C&I waste accounts for some 60 million tonnes of waste a year, compared with around 27 million tonnes of household waste and generally remains under-utilised in terms of recycling and recovery. But recognising the difference between waste sources is still important.

Although data on municipal waste is currently improving, the lack of good quality data for C&I waste in particular means there is limited evidence for policy implementation in this area. Without clear information on C&I waste, it is difficult to identify measures that will address the most valuable waste management strategy. In December 2010, DEFRA published results of its 'survey of commercial and industrial waste arisings 2010'. The results provide estimates of the amount of waste that businesses generate and how it is managed.⁴ This is useful, but there was a significant time lapse between this survey and the previous national survey of business waste in 2002-03. It therefore does not reflect any long-term trends regarding quantities of C&I waste in the UK.

More comprehensive data is required to understand and analyse waste and to quantify and prioritise action plans to manage C&I waste most effectively. Only then can convergence in the management of waste streams really be addressed. Business is required to share a great deal of information to meet regulatory and permitting obligations; DEFRA and the Environment Agency could explore innovative ways of utilising this information more effectively to get a more useful picture of the C&I waste produced.

Recommendations

- The review of waste policies should result in a practical delivery plan to support waste management over the next decades. In particular, the plan should provide long-term clarity about the future of waste policy to offer certainty and confidence for investors.
- Effective waste policy requires cross-governmental cooperation. DEFRA, DECC, BIS, DCLG and HMT should strengthen and continue cross-departmental dialogue on waste and resource policy beyond the lifetime of the review, taking joint ownership of the delivery plan.
- The waste review should identify the differences between waste streams and how this requires flexibility when considering the most appropriate waste management option, to get the maximum environmental and economic value from waste.
- DEFRA should avoid picking 'technology winners' and allow the market to develop the most appropriate solution for the available waste streams.
- DEFRA should work with business to deliver consistent and regular reporting on different waste streams, particularly on C&I waste. DEFRA and the Environment Agency should explore innovative ways of using the information they collate, particularly via environmental permitting and duty of care notes.

Finance and planning barriers must be tackled

Effective infrastructure delivery requires a new approach to finance

Waste infrastructure in the UK requires significant investment over the next decade. By the middle of the 2010s, around 300 of the UK's largest landfill sites will close as a result of the 1999 EU Landfill Directive. This policy driver alone will require around 2,000 new waste management facilities to be built by 2020⁵, including material and energy recovery facilities. It is estimated that by 2020 some £10bn will need to be invested in new waste management infrastructure, mostly by the private sector. We therefore welcome the assurances from ministers that they fully grasp the scale of investment necessary for new waste infrastructure.

In the context of the government's priority to reduce the fiscal deficit, and in particular the commitment of DEFRA to cut its budget by 29% over four years, the private-finance initiative (PFI) will no longer be the only public procurement model available. DEFRA expects capital investment savings of 15% by 2015 and has announced it will no longer fund seven of the 18 waste PFI projects in the pipeline before the spending review.

At the same time, securing private investment for long-term waste management projects remains difficult. This is particularly the case for smaller waste management projects needing less than £2m investment where returns for investors are less clear, or where new energy recovery technologies have a limited track record of commercial application. All too often developers have to ensure input demand for new waste recovery facilities remain for the duration of the contract – perhaps for as long as 20 years. Debt pricing for such projects is high and this makes them a financially challenging investment prospect.

But as the 2009 CBI report *World-class public services: meeting the delivery challenge* argued, there is now an array of financing models, developed in response to changing service and infrastructure needs, that could provide the blueprint for future waste infrastructure projects. The 'integrator model' is one example where a private company is chosen to run the PFI process from start to finish, taking the role of the delivery partner and managing the whole supply chain (see *World-class public services: meeting the delivery challenge for further models*). Uncertainty for investors and finance providers in the current climate requires quick thinking from government, working with industry to explore these sources of funding to renew investor confidence. The CBI also encourages Infrastructure UK to continue to assess how these new models may work in practice.

To further address the potential financing gaps, the government should recognise waste infrastructure when developing financial levers to support green investment.

The Renewable Obligation, Feed-In-Tariffs and the Renewable Heat Incentive should be aligned with waste policy to ensure a long-term stable environment for investment, carbon and waste reduction. We also encourage the government to explore the potential for the Green Investment Bank to support waste management facilities.

Shared services will deliver more investment in the sector

As officials think about meeting this challenge, it will be important to consider infrastructure delivery across geographical boundaries. The average amount of landfill space in England still available is estimated to run out in eight years, but the situation in individual areas may be very different. For example, there has been a particular shortage of landfill in the south east. If sufficient new waste recycling or recovery infrastructure is not built in these areas of landfill scarcity, waste will have to travel from here to areas of landfill surplus. With this in mind, even greater investment may be required to deliver the effective waste management choices the UK needs.

To understand this situation in more detail, the government should work with business to build an outline of England's waste infrastructure needs. Some work of this nature has been done. For example, the regional development agency Advantage West Midlands undertook a mapping exercise of the best sites for waste management infrastructure, taking into account proximity to waste sources, waterways and potential industrial heat users. DEFRA's Waste Infrastructure Development Programme, has previously planned to undertake a similar exercise. Prescribing the location of facilities is not the role of central government and businesses will logically look for the optimum locations for development, but it should be recognised that since the abolition of English Regional Spatial Strategies, government needs to identify an alternative framework for understanding our national waste infrastructure needs, if we are to meet our 2020 ambitions and beyond.

The 2010 CBI report *Shared services in local government: this is the time*, argued more broadly that wider adoption of shared services across local government offers one of the most compelling ways to transform the services delivered by authorities across the country. In line with the government's localism agenda, it is vital that each authority is empowered to find waste management solutions tailored to the needs of their community. Shared services should be part of the solution, since cross-local authority economies of scale can be the most efficient way of securing greater value for local citizens and small businesses.

Standardising local authority recycling services, with recognition of the needs of local people and communities, could therefore be a useful tool to promote financial savings, as well as investment.

Opening up development of larger-scale waste treatment facilities, where there is potential to cater for joint municipal and merchant markets, can also provide value-for-money solutions.

A joined-up approach to planning is also required

The government's response to the waste review should be fully coordinated with the current overhaul of the planning system. As mentioned in the recent CBI brief *Going to waste: making the case for energy from waste*, planning is a major obstacle to increasing the number of waste management facilities in the UK. On average it has taken seven years for a waste management company to get a plant running, of which four years are typically spent in the planning process.

Some waste management projects qualify as 'nationally significant infrastructure projects' under the 2008 Planning Act. The CBI recognises the government's intention to replace the Infrastructure Planning Commission (IPC) with a Major Infrastructure Planning Unit within the Planning Inspectorate, requiring formal sign-off from the environment secretary of state for all major infrastructure projects. This could work if the sign-off timeframe is limited and the single consent regime of the IPC system – established in the Planning Act – is retained. DEFRA must communicate with DCLG the potential impact of any changes to the planning system on the delivery of new waste management facilities.

For smaller facilities, the local planning provisions in the government's Localism Bill could create additional uncertainty at the local level, where waste management facilities often already suffer severe delays. Delivering the right technologies and economies of scale requires leadership at the national level, and with the abolition of regional strategies, provisions should be made to secure robust strategic planning at a sub-national level in the new planning system. We welcome the 'duty to cooperate' clause in the Localism Bill, which requires constructive, active and ongoing engagement between local planning authorities and other prescribed bodies. But this clause should be tightened to more clearly set out how the 'duty to cooperate' will work in practice and be enforced.

To offer investors sufficient long-term confidence and stability to fund the infrastructure we need, it will be necessary to speed up the local planning process. As part of this, the government should consider the benefits of defining waste recovery facilities as sustainable development within local development frameworks. In October, the government white paper *Local growth: realising every place's potential to grow* proposed the introduction of a national presumption in favour of sustainable development, which would apply to decisions on all planning applications.⁶ Treating waste management recovery and recycle facilities in this way will go some way in helping local authorities to adapt to changing local circumstances with regard to its waste management and respond more quickly to waste infrastructure needs.

A presumption in favour of sustainable development should be provided for in the upcoming National Planning Policy Framework.

Another key aspect of the local growth white paper is the government intention to create 'powerful incentives' for local communities in support of local growth, which the CBI welcomes. Providing direct encouragement to communities to give the go-ahead for waste management facilities is likely to improve the local planning process. One idea outlined in the white paper is to review options for Councils to retain locally-raised business rates from new waste infrastructure. As part of the review, DEFRA should therefore consider how business rates raised from waste treatment facilities could be directed back to local communities, as an incentive and a source of funding for future waste infrastructure. This approach should be recognised within the waste review, where there is an opportunity to demonstrate how this might work in practice. The CBI also supports the use of the Community Infrastructure Levy (CIL) as a further incentive for communities in favour of local development.

Recommendations

- As part of the waste delivery plan, DEFRA should identify an alternative framework for understanding our national waste infrastructure needs, in line with meeting our 2020 and 2030 ambitions. DEFRA should work with business to build an outline of England's waste infrastructure needs and promote this across government.
- DEFRA and HMT should ensure the waste review delivers clarity on future funding of public procurement models for municipal waste management facilities.
- Local authority leaders should explore with business shared waste management services across local authority areas to make it easier for business investments to cross boundaries.
- As part of the planning reforms set out in the Localism Bill, the local planning process could be made more efficient by defining recovery facilities as sustainable development within local development frameworks.
- Provisions should be made to secure robust strategic planning at a sub-national level in the new planning system. The Localism Bill should set out how the 'duty to cooperate' clause will work in practice and be enforced.
- DEFRA and DCLG should implement innovative ways to incentivise local communities, such as through the retention of extra business rates from waste management facilities, as part of its proposals to encourage local authorities and communities to accept local economic development.

Achieving zero waste requires smarter regulation and fairer and better enforcement

Identifying the right policy instrument is key

It is clear that the complexity of the current policy system is a barrier to a zero-waste economy. For businesses – particularly SMEs – waste management decisions are often logically based on the most economically viable option. At present, waste policy – particularly the incentives associated with different waste management options – does not always enable the best environmental and economic outcome. For example, an independent retailer will pay for waste disposal via business rates, with little incentive to pay additional costs to use recycle facilities. This is particularly the case for businesses producing relatively low levels of recyclate materials, which may need to be stock-piled in order for the recycling of the material to be a more economically viable route.

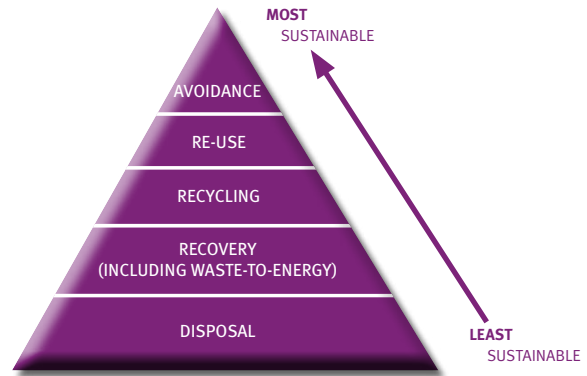
The waste review is an opportunity to realign existing policy drivers and incentives with other strategic goals. The waste policy review should therefore include a full audit of policies in England to ensure existing policies are based on sound impact assessments and cost/benefit analyses. Waste reduction measures deliver greatest resource efficiency when they are evidence-based and proportionate to the problem. They should be avoided if they could have negative implications on the environmental benefit of other waste treatments. This will go much further in retrieving the maximum environmental and economic value from our waste – for example, business would benefit from greater certainty on the future of landfill tax beyond 2020.

Introduced in 1999, the EU Landfill Directive and the supporting landfill tax escalator have led to a dramatic change in the waste management sector, acting as a positive driver in landfill diversion and increased recycling and recovery. But recent consultations on landfill bans complicate the policy landscape. Already under review in Wales and Scotland, bans undermine the landfill tax. In this instance, rather than introducing more regulation, the government should focus on making the existing mechanisms more effective. For this reason, the CBI welcomes the government's floor price in the landfill tax and would welcome further certainty beyond 2020.

The waste hierarchy should be a central pillar of waste policy

At the heart of waste policy should be the waste hierarchy, the guide by which waste producers are penalised and/or incentivised to manage waste according to its environmental desirability (**Exhibit 3**). The waste hierarchy provides businesses with a good model on which to base waste management programmes and businesses know that in the first instance prevention, re-use and recycling are the best means to reduce quantities of waste. The revisions to the EU waste framework directive, which from 2011 will recognise the waste hierarchy as a priority order in UK law, will work to embed this approach.

Exhibit 3 The hierarchy of waste



But a rigid translation of the waste hierarchy into policy can exacerbate trade-offs in strategic objectives. Policy levers and targets that concentrate on relatively small sectors or material types can distract companies from managing their waste in the most efficient way. For example, measures recently suggested – such as bottle deposit schemes to incentivise recycling and toy packaging initiatives to prevent waste at design stage – could work to reduce waste. But cost/benefit analysis and a level of lifecycle thinking is required to ensure measures represent the right focus to deliver maximum environmental and economic benefits. They should be targeted to deliver results in areas representing the greatest environmental gains, over the shortest possible time.

With smart regulation industry can find smart solutions

Making it easier for businesses to use by-products and waste material from their business processes, or those of others, provides an opportunity for business to explore smart solutions to help deliver a zero-waste economy. An oft-quoted regulatory barrier is the need for a business, which would like to use a waste material from another business as a raw material, to have a permit from the Environment Agency to register as a waste management facility. As a legal requirement, the Waste Framework Directive requires legal registration of waste carriers who 'normally and regularly' transport waste. A rigid interpretation of this rule, requiring small businesses that transport waste on the odd occasion and for no commercial gain to register as waste carriers for example, could result in the reuse of waste materials costing more than using raw materials. This is not the intended consequence of the legislation and should be approached pragmatically, in support of risk-based regulation which appropriately reflects environmental risks.

The CBI supports the work of the government-funded National Industrial Symbiosis Programme (NISP), which enables company partnerships to identify where a company's waste, energy or by-product can be sold to others that might use it as a valuable resource.

This programme represents a productive exchange of potential waste materials and should be encouraged and further developed.

In line with the de-regulation agenda, the government should also consider non-regulatory approaches in the waste review. Without placing undue burdens on business, voluntary initiatives can be a highly effective policy lever, driving green innovation and growth. The CBI supports responsibility deals, collaborative agreements between government and business sectors to achieve agreed targets, as they have proven an effective and low-cost means of reducing waste and increasing recycling.

Responsibility deals are most effective when implemented through relatively closely defined sectors, where they have full commitment of the businesses involved. The Courthauld Commitment is a well-known best practice example. Launched in 2005, the agreement represents over 90% of UK grocery retailers with a common aim of reducing the carbon and environmental impact of the grocery retail sector.⁷ The commitment has prevented an estimated 1.2 million tonnes of food and packaging waste over the last five years.⁸ In contrast, responsibility deals where there is a limited business case, can actually be little more than additional regulation, which could have perverse effects, as the responsibilities distract from other routes to maximising resource efficiency.

Such policy drivers are most cumbersome in very diverse sectors, where participation is sparse and where there is little incentive to report progress, since the measurement and publication of performance is essential for determining success. However, the Ashdown Agreement is a good example of regular measurement and reporting in practice, a voluntary agreement between UK plasterboard manufacturers to reduce the amount of plasterboard to landfill.⁹ Signed by all UK plasterboard manufacturers, the agreement is evaluated annually on performance against its objectives.

Targeted enforcement should be used to better effect

To ensure a level playing field, responsible business wants better enforcement. But more work needs to be done in distinguishing between the deliberate offenders who undermine the majority of responsible businesses and those with good environmental records but who have made a genuine mistake or administrative error, as the Environment Agency (EA) recognises. The CBI hopes the new civil sanction powers introduced under the Fairer and Better Environmental Enforcement initiative will give the EA a greater range of tools to make enforcement fairer and more proportionate to the offence, helping businesses which make genuine errors to notify the EA and offer recompense for their offence.

DEFRA’s waste strategy review for 2008-09 indicates that illegal waste activity is decreasing.¹⁰ With the current fiscal constraints, the EA will have significantly less resource and smarter, more targeted enforcement will support it in continuing to deliver its enforcement activities effectively.



There is some way to go, though, in establishing a culture change that recognises this proportionate approach. At present, EA decisions are not consistent in all regions.

Waste prevention policies should be in line with increasing demand

The CBI welcomes government efforts to engage a wide variety of stakeholders in its review of waste policies. This is essential because as much as consumers need the right products and services to make it easier for them to minimise waste, businesses need the commercial driver to implement such changes, whether they are in the business of designing products or investing in materials management facilities. Efforts to prevent waste at the product design and manufacture stage will always be more successful where there is clear demand from consumers. **Exhibit 4** is a snapshot of this market relationship that exists between consumers and businesses on green products.

Interventions by government to support the development of green products should take full account of the trade-off between supply and demand, identifying opportunities to intervene that will have the biggest impact and support the market, while giving businesses the flexibility it needs to innovate and grow.

End-of-waste quality protocols, developed via WRAP and the Environment Agency to identify by-products from waste, represent market-led government intervention and are helping to deliver and grow recycle markets.

We welcome continued government support of this project and its efforts to publicise the benefits.

Recommendations

- The waste policy review should include a full audit of policies in England to ensure existing policies are based on sufficient impact assessments and cost/benefit analyses. Waste reduction measures deliver greatest resource efficiency where they are evidence-based and proportionate to the problem. They should be avoided if they could have implications on the environmental benefit of other waste treatments.
- Business should be consulted by DEFRA at the earliest stage, to identify the appropriate policy lever to achieve the best results. Particularly for sector specific initiatives and responsibility deals, industry is best placed to decide if there is a sufficient business case to drive behaviour change.
- Enforcement of the waste hierarchy, to be transposed into UK law in 2011, must take into account reasonable justifications for departing from this ranking based on technical feasibility, economic viability and environmental protection, as laid out in the directive.
- DEFRA should encourage business-led solutions and break down barriers to cross-sector activity, by ensuring regulatory burdens reflect the actual environmental risks involved and do not deter businesses from pursuing more sustainable options.
- The work of WRAP and the Environment Agency on end-of-waste protocols should continue to be sufficiently resourced, to improve confidence in the recycled materials market.

Footnotes

- 1 <http://ww2.defra.gov.uk/environment/economy/waste/>
- 2 *Building on progress...facing the future*, summary of sustainable development report 2010, Minerals Products Association
- 3 *Commercial and industrial waste in England*, statement of aims and actions 2009, DEFRA
- 4 See <http://ww2.defra.gov.uk/news/files/2010/11/1011stats.pdf>
- 5 *Waste – an audit*, Environment Agency's evidence to Environmental Audit Committee's Inquiry, April 2003
- 6 See <http://www.bis.gov.uk/assets/biscore/regional/docs/l/cm7961-local-growth-white-paper.pdf>
- 7 See http://www.wrap.org.uk/retail_supply_chain/voluntary_agreements/courtauld_commitment/index.html
- 8 See http://www.wrap.org.uk/retail_supply_chain/voluntary_agreements/courtauld_commitment/phase_1/index.html
- 9 See http://www.wrap.org.uk/recycling_industry/information_by_material/plasterboard/ashdown.html
- 10 See <http://www.defra.gov.uk/environment/waste/strategy/documents/waste-strategy-report-08-09.pdf>



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