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Response to the Sustainability Appraisal of the Wales Waste Strategy
Welsh Assembly Government

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The Sustainability Appraisal of the Wales Waste Strategy

The Sustainability Appraisal Framework (overleaf) challenges the Waste Strategy to maximise the sustainability of what it can achieve: have you any comments in regard to the questions it asks of the Strategy?

The 'managing of waste' is a legacy based upon end of pipe thinking. Lifecycle thinking has to underpin all policy interventions and activities. The challenge for this Waste strategy is to ensure that the core aim is fundamentally always about resource efficiency and effective management. This shift will help align the strategy with other policies and programmes by enabling the inclusion of people and infrastructure as well as energy, materials and waste; all of which are critical elements. Fundamentally capacity building and lifecycle thinking have to underpin all policy interventions and activities.

What plans, policies and programmes (currently or already in place) will influence the aim of the Strategy to deliver sustainable waste management across Wales?

EDC strongly support the need for greater policy / strategy coherence and horizontalisation. The generation of waste is an integrated and cross sectoral issue therefore many policies and strategies will have some type of influence. As a result this lifecycle link between resource extraction, production, consumption to waste and emissions can make it difficult to pinpoint which government departments and policy makers have the responsibility for implementing policies for waste prevention. The Waste Strategy has to attempt to bridge this gap.

Nationally the Manufacturing Strategy, Green Jobs Strategy, Innovation Action Plan and Sustainable Development Scheme Strategy seem to be key. In the EU, decoupling of environmental impacts from economic growth has become a prominent policy agenda therefore the relationship between economic development and sustainable development should be creating a greater number of opportunities for fresh thinking. Obviously other EU activities will have a direct impact and amendments being made to ROHS and WEEE Directives reinforce this drive for a strong integrated approach.

What opportunities exist to maximise sustainable waste management through engagement with such plans, policies and programmes? How can we maximise these?

Waste strategy principles need to be embedded within policy and best practice. All strategy development will involve certain key ideas such as developing critical leadership and management skills, encouraging innovative practice etc and promoting and building upon academic / industry / social enterprise links. By finding effective ways to align or collaborate around these issues will ensure greater success.

The use of a similar benchmarking tool will help provide synergy (ecological input/output analysis, mass balance, material flow analysis etc)

Many products or components or raw materials consumed all have a substantial resource impact prior to reaching Wales. The WAG have already committed to addressing international impacts of activities and decisions undertaken in Wales through the Sustainable Development Plan 2004. The action plan states that "solutions to problems in Wales cannot be found only by addressing them on a Wales basis and decisions we take in Wales can have global repercussions." This implies that the legacy of waste created for Wales should be a consideration. Innovative companies actively practicing producer responsibility and demonstrating chains of custody should play a strategic role.

According to research prepared by the OECD in 2008 many environmental innovations combine an environmental benefit with a benefit for the firm or user. Interestingly, companies do not see activities towards resource and energy efficiency improvements as distinct from a 'normal' innovation process. Integrating resource efficiency considerations into innovation policy therefore has to remain a priority.

"The next few years will test the UK's innovation capability and, while the recession may pose challenges, it will also provide opportunities. If we do the right things, the UK will emerge stronger as a result."

Lord Drayson, Minister for Science and Innovation, on the publication of NESTA's "Attacking the Recession" Report, 04/12/08.

Are there any potential conflicts between the Waste Strategy and the aforementioned plans and programmes which we should be aware of? Can you recommend how we might mitigate or offset these potential conflicts?

High Value Added Manufacturing is a key focus of the draft Manufacturing Strategy. An element of this includes addressing end of life management and even cradle to cradle philosophies. If not supported appropriately this type of thinking could be restricted for example if recycle markets are developed by a third party and deemed more financially valuable in the short term. There is a need to promote and find ways to actively support solutions that achieve the highest environmental value taking a longer perspective.

It is recognised that some of the more high tech environmental goods and services industries can bring very specific resource management challenges. In order to address this potential risk economic development has to cohere with resource efficiency objectives.

To create the step change required there is a need to integrate product and sectoral approaches with the waste strategy. The sectoral focus rather than waste type focus is to be commended but this does run the risk that there is potential for inconsistencies eg textiles has been suggested as a manufacturing focus within the draft Manufacturing strategy but this is not necessarily a waste focus therefore any drive for resource efficiency with this area might not receive the infrastructure investment deemed appropriate.

We would welcome any other thoughts on maximising the sustainability benefits of what the revised Strategy can achieve....

Ecodesign, as a strategic design management process, is a valuable approach to addressing resource efficiency. Research work undertaken by EDC has identified that mechanisms addressing the following areas will encourage the greatest adoption and practice of ecodesign within Wales:

- education
- information and motivation
- procurement
- leveraging innovation

EDC therefore recommend that in order to maximise resource efficiency these should be a strategic focus.