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Dr Therese Coffey MP
Parliamentary Under Secretary of State
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Dear Dr Therese Coffey MP

Thank you for your recent letter expressing concern about Camden's 2015/16 recycling rate of 24.8%. The London Borough of Camden champions recycling, within a very challenging environment and has worked hard over recent years to ensure that services are in place to drive up recycling levels across the borough. Camden 'Green Action for Change' Environmental Sustainability Plan 2011-2020 supports North London's joint recycling target to recycle at least 40% of household waste by 2020.

Over the past months, Camden officers have worked with Department for Environment, Food and Rural Affairs (DEFRA) staff about reporting issues with Camden's 2015/16 recycling rate. Due to the WasteDataFlow system using default factors to calculate Camden's 2015/16 recycling rate, DEFRA officials have confirmed that Camden's 2015/16 recycling rate stands at 26.4%, a difference of +1.6% (see attached letter). It is disappointing to read that there is no intention from the Department to update the associated national dataset, as this is what acts as a public record of Camden's 2015/16 recycling rate.

In your letter you asked a number of questions, which are answered below. The attached Environment Services strategy document provides some more detail to Camden's challenges and service responses. Officers would be happy to meet with you or your department to discuss these services and challenges in more depth.

1) What's working well?

The London Borough of Camden is a very diverse borough with a varied housing stock. We recognise the need for different service offers to cater for different housing types, understanding that there is not a 'one size fits all' solution for recycling and waste services. We offer a range of recycling containers (wheelie bins, re-usable boxes, re-usable bags, single-use bags) to enable residents to conveniently store and present their recycling. In 2013 we introduced wheelie bins for recycling – to properties with room to store them – led to an increase in dry recycling tonnages of 13%. Also, in 2015 Camden investigated ways to increase storage of high street waste which led to an improved dry recycling service for 'Flats above shops'. The provision of single-use

clear recycling bags led to increased participation and satisfaction in recycling across those households.

Camden provides a full range of recycling services, including mixed dry recycling, food waste, garden waste (subscription based), textiles, waste electrical equipment and batteries.

Camden was also successful in submitting a bid to DCLG's Recycling Reward Scheme 2015-16 for funding to encourage recycling and reduce waste through 'incentive schemes'. Launched in October 2016, our scheme offers personal and community rewards to recognise positive behaviour and action and has more than 16,000 active members.

In early 2015 we held a community engagement exercise 'Camden Waste Challenge' to help structure our 2015/16 Environment Services Contract procurement exercise (November 2015 – June 2016). This process developed a strategy for a recycling lead approach, to structure services to focus on the 85% of recyclable material in Camden's waste stream.

This new contract delivers a set of services that fits WRAP's national vision of consistent services across the country - with restrictions on weekly general waste collections (120L per household), weekly recycling and weekly food waste collections. The contract also provides residents with an 'opt in' garden waste collection service and additional free recycling collections of textiles, small electrical equipment and batteries.

So far, our early figures show that from April – June 2017 there has been an increase in mixed recycling and a decrease in the general rubbish collected (compared to the same period in 2016)

2) Are there particular reasons affecting waste and recycling locally to you?

There are some key areas that impact on recycling levels across inner city areas like Camden:

Deprivation levels – Areas in Camden are some of the most deprived in the country, including Somers Town, St Pancras and Gospel Oak. The lowest recycling performers in London tend to be those boroughs with the highest levels of deprivation using the government's Indices of Multiple Deprivation (IMD), as well as high population density.

Highly transient population – Low levels of home ownership, along with a recent growth in privately rented, short-term accommodation, are having an impact across the capital. Homeowners tend to recycle more – we assume because they are a more stable and invested population that uses and understands local services, whereas communities with larger numbers of renters are highly mobile with people often not residing in one area long enough for behaviours to become embedded.

A high percentage of flats – whether high-rise, house conversions or flats above shops – presents challenges both to residents and to council collection teams. There is usually limited or no outdoor space, which means no garden waste, the collection of which can make a significant contribution to recycling figures in more rural parts of

England. Flats, maisonettes and apartments account for around 85% of Camden's housing stock. Research by WRAP shows that well established communal recycling schemes currently yield around 90/kg/hh/yr which is nearly half that achieved from low-rise properties.

Recent audience segmentation research conducted by WRAP and up-weighted in London, shows that the two audience segments (out of 6) that recycle least and contaminate the most, make up a disproportionately high percentage of the resident population in inner London boroughs (between 47% and 55%), like Camden. Attitudinally they are also the most difficult to reach, as they are disengaged and pay little or no heed to conventional authority.

3) Are the obstacles outside your authority's control that may affect your recycling rate?

It is not helpful to compare dense urban authorities' recycling performance against less densely populated areas. Camden is the 8th most densely populated borough in England, and the population is forecast to increase by 22,600 (9.8%) between 2014 and 2029. It is also home to the largest student population in London, with more than 17,500 higher education students living in rented accommodation.

A more nuanced and objective benchmark for Camden, and London's, recycling performance might be to compare it with other similar cities globally. London is the EU's largest city with over 8.7 million residents, and faces challenges of a kind and on a scale more helpfully benchmarked against other large global cities. A recent report showed that London has the third highest municipal recycling rate, when using 'like for like' waste and recycling data to compare performance with 35 other global cities¹, including Berlin, Paris and New York.

Camden also receives over 400,000 daily visitors and commuters to the borough, coming not only to work but also to visit the borough's many attractions and a thriving cultural and night time economy. This puts enormous pressure on our public realm.

Local authorities manage material and products (disposal / recycling) at the end of their life, with no input further up the resource management chain, particularly in design and manufacture. A more cyclical approach to product and packaging manufacture would enable more re-use and recycling of materials. Enhanced public information from manufacturers about how their products and materials can be re-used and recycled would build on local education and service delivery.

Finally, Camden was also hit harder than most by cuts to central government grants since 2010-11. By 2019 Camden will have had to reduce our budget by £171 million- which equates to a cut in our core spending power of 20% by 2020.

4) Over the longer term, what are the biggest challenges and opportunities you see in driving recycling improvements locally?

Commonly it is seen that social and economic factors are statistically most strongly correlated with the changing trends in waste arisings. Waste prevention and the light weighting of materials must be considered when forecasting future waste arisings.

¹International Recycling Rate Comparison Project, David Greenfield, October 2016

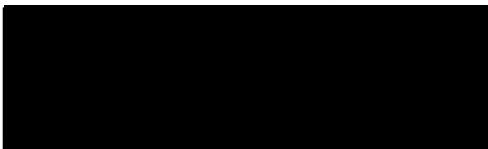
The assumed recycling material capture rates from flats are substantially lower than those from houses with gardens; since the former are predicted to increase in overall proportion so the overall recycling capture rate is predicted to fall over time.

There is now a real challenge to consider the different communities within Camden - residents, businesses and visitors - to understand their underlying knowledge and attitudes towards the environment, materials and resources that they use and how service design and behaviour change can further drive improved resource usage.

Waste materials need to be increasingly viewed as resources, moving from a linear model of production and consumption to a more circular model, which can consist of sharing, citizen engagement and local resilience through both practical and strategic changes that are relevant to the diverse communities within the borough.

We want to build on the work of Camden's new Environment Services contract to continually review local, regional and national opportunities to improve services year on year to drive up recycling levels across Camden. We will continue to work with our partners across Camden and London (North London Waste Authority, Resource London, London Waste and Recycling Board, WRAP) to investigate and deliver the best ways to increase recycling and reduce waste in Camden.

Yours sincerely,



Councillor Meric Apak
Cabinet Member for Sustainability and Environment