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Consultation – summary of responses

Beyond Recycling



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This document is also available in Welsh.

Beyond Recycling Consultation Evaluation and Summary Report

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Table of contents

Executive Summary	iii
1. Introduction	1
2. Consultation responses.....	4
3. Findings.....	7
Overall impressions.....	7
Building on our recycling record	9
Supporting prevention and re-use	14
Driving innovation and materials use	19
Using Government levers.....	23
Enabling communities and businesses	28
Investing in infrastructure	31
Other questions.....	34
4. Conclusions.....	35
Annex A: Summary of stakeholders.....	36
Annex B: List of organisational responses	37
Annex C: Headlines - Bangor Consultation, 27 th February 2020	42
Annex D: Headlines - Narberth Consultation, 5 th March 2020	47
Annex E: Headlines – Chepstow Consultation, 9 th March 2020.....	50
Annex F: Headlines – Mold Consultation, 12 th March 2020	53

Glossary

Acronym / key word	Definition
CITB	Construction Industry Training Board
DRS	Deposit Return Scheme
EPR	Extended Producer Responsibility
IGD	Institute of Grocery Distribution
LCA	Life-Cycle Assessment
SME	Small-Medium Enterprise

Executive Summary

- i. Between December 2019 and April 2020, the Welsh Government consulted on a new circular economy strategy, *Beyond Recycling*. The consultation sought ideas and positive contributions to move Wales to become a zero waste, net zero carbon nation that uses its fair share of resources and seizes the economic opportunities from the transition to a circular economy. The term zero waste means 100% recycling and no residual waste. A Circular Economy is defined, in the context of this consultation, as keeping resources in use for as long as possible and avoiding waste. The consultation document is comprised of six key themes, with eight headline actions, centred on the aim of delivering a fairer, greener and more prosperous Wales.
- ii. The consultation process consisted of two elements – face-to-face events and online responses – to ensure the broadest engagement of citizens and stakeholders across Wales and beyond. Around forty face-to-face events were carried out, including open invitation sessions and regional events tailored to specific audiences which included young people, local authorities, businesses, the waste sector, environmental groups, regulators, and academics. The online consultation received 220 responses via a web survey platform, email and hard copy. The analysis of both elements of the consultation process inform this summary report.
- iii. Across the responses, there was general positivity to both moving towards a circular economy and the suggested Welsh Government actions as a means to achieve the aims. Whilst each response and event brought up its own discrete issues, common responses, perspectives and ideas on how Wales might achieve a circular economy were identified. These are listed below, with additional headline themes summarised in the accompanying graphic (Figure 0.1).

- The strategy should reflect the priorities outlined in the waste hierarchy, and material use should be based on Life Cycle Assessments.
- Actions towards a circular economy should be implemented consistently across Welsh regions, Welsh Government departments, and, where possible and practicable, integrated with wider action.
- Actions towards a circular economy should be considered and embedded in all Welsh Government policy, rather than siloed in individual directorates.
- Improved access to necessary infrastructure, education, resource, guidance and specific circular economy support is paramount.
- Support should be offered across all sectors - private, public, and voluntary - to alter current practices that are not in line with a circular economy approach, involving assistance developing solutions and innovative designs.
- Consistent monitoring and review of actions, including significant use of data, is needed, as well as definitive targets.
- Targets and guidance are insufficient on their own. Where necessary, new legislation should be introduced to both encourage change and penalise non-compliance.
- The strategy must include details of how the necessary cultural shift towards a circular economy will be promoted.

Figure 0.1: Beyond Recycling consultation headlines by theme



1. Introduction

Beyond Recycling Consultation

- 1.1 In December 2019, the Welsh Government launched the consultation 'Beyond Recycling: a strategy to make the circular economy in Wales a reality'.¹ In the context of this consultation, a circular economy is defined as one where waste is avoided and resources are kept in use as long as possible. At the core of the strategy are the strategic aims to create a fairer, greener and more prosperous Wales.
- 1.2 The consultation, which ran until April 2020 (following extension due to the Covid-19 pandemic), was realised earlier in the policy cycle than usual, aiming to ensure a broad spectrum of citizens' perspectives and ideas (in terms of audiences and locations) were heard. The document, which was comprised of six key themes (Figure 1.1) with eight headline actions and twenty-two questions, focused on inviting ideas and positive contributions to shape policy as opposed to seeking approval or reaction to previously agreed material.
- 1.3 The consultation was designed to enable the Welsh Government to make informed decisions on the final strategy (due end of 2020), enhancing the strategy's legitimacy, transparency and efficiency. Throughout the consultation process, there was a strong presence from the Deputy Minister for Housing and Local Government, emphasising the importance of the consultation to the Welsh Government.

¹ Welsh Government Consultation Document, Beyond Recycling: a strategy to make the circular economy in Wales a reality, December 2019.

Figure 1.1: the six core themes of focus in Beyond Recycling



Source: Welsh Government

Welsh Context

- 1.4 By 2050, Wales aims to live within the planet's resources, generating zero waste and net zero carbon emissions. Following the declaration of a climate emergency and with the recognition that 45% of emissions come from goods and products, the Welsh Government views a circular economy as making a major contribution towards achieving these aims.
- 1.5 Wales has an existing strong foundation from which to build a circular economy, as a global leader in recycling and resource efficient strategies. This is combined with a history of community and citizen led initiatives such as the community re-use sector, Repair Café Wales, Refill Wales, and plastic free communities. It is recognised that moving towards a circular economy offers economic opportunities, allows participation in new markets, develops resilience, sparks innovation, and secures Wales as a front runner in

waste management.² Consequently, a circular economy corresponds to existing Welsh strategic approaches and other frameworks, including:

- Prosperity for All: A Low Carbon Wales³
- Prosperity for All: the national strategy⁴
- Natural Resources Policy⁵
- Well-being of Future Generations Act⁶
- Prosperity for All: Economic Action Plan⁷
- Innovation Wales⁸
- Third Sector Scheme⁹
- The Wales Procurement Policy Statement.¹⁰

² WRAP, Wales and the Circular Economy.

³ Welsh Government, Prosperity for All: A Low Carbon Wales 2019.

⁴ Welsh Government, Prosperity for All: the national strategy. Taking Wales Forward.

⁵ Welsh Government, Natural Resources Policy 2017.

⁶ Welsh Government, Well-being of Future Generations (Wales) Act 2015.

⁷ Welsh Government, Prosperity for All: Economic Action Plan 2017.

⁸ Welsh Government, Innovation Wales 2014.

⁹ Welsh Government, Third Sector Scheme 2014.

¹⁰ Welsh Government, Wales Procurement Policy Statement, 2015.

2. Consultation responses

2.1 The analysis of two consultation elements – online and face-to-face events – inform this report.

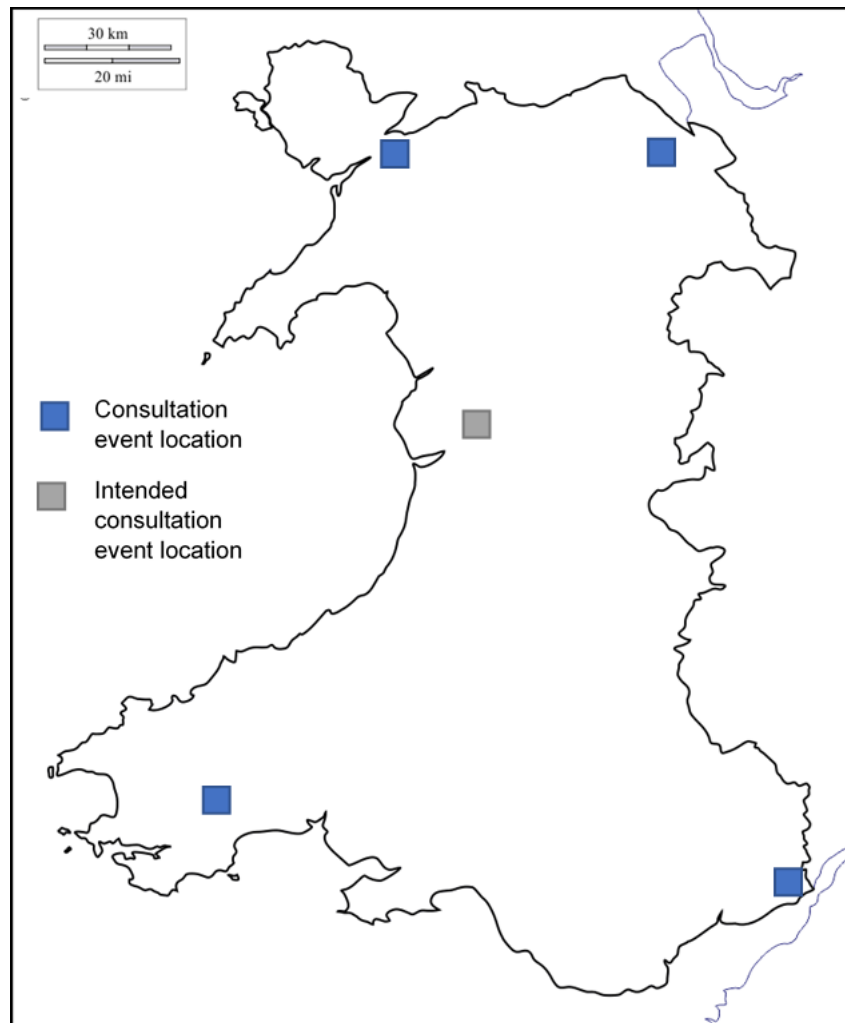
Face-to-face consultation events

2.2 A full programme of approximately forty face-to-face consultation events was carried out. The events included a balance between traditional open invitation sessions, events tailored to specific audiences, and an event in London for professional institutions, trade associations, and circular economy experts and agencies, thus ensuring a range of perspectives and ideas were gathered. A summary analysis for each stakeholder group is provided in Annex A.

2.3 Four public consultation events were facilitated by Miller Research, with a geographic spread to ensure the broadest engagement of citizens and stakeholders across Wales and beyond. The planned fifth event in Mid-Wales, Machynlleth, was unfortunately postponed due to the Covid-19 pandemic. Therefore, data gathered from the events represented:

- North West Wales: Bangor and Anglesey
- South West Wales: Narberth and Haverfordwest
- South East Wales: Chepstow
- North East Wales: Mold.

Figure 2.1. Location of carried out and intended consultation events in Wales.



Online consultation

- 2.4 A more formalised consultation process invited responses through a web survey platform, email and in hard copy.
- 2.5 A total of 220 responses to the online consultation were received. Due to the Covid-19 pandemic, the original deadline for response submission was extended. However, it should be stated that the pandemic may still have impacted the number of responses received.
- 2.6 The responses represented individuals (81 responses) and 125 varying organisations including citizen groups, communities, technical groups and the public sector (full list in Annex B). Several responses

– particularly campaign responses – were repeated so were only analysed once to avoid duplication in analysis.

- 2.7 Some respondents who submitted an email response did not follow the questionnaire in the consultation document. These views have been analysed and included in this report where appropriate.

Approach to analysing consultation responses

- 2.8 All responses have been collected and analysed by Miller Research, by question and corresponding theme, to draw out the dominant and alternative views to the consultation.
- 2.9 This report provides a summary of responses from the face-to-face and online consultations. It is structured according to findings relating to each of the six themes of the consultation (Figure 1.1.). Of particular focus in the report is the provision of additional suggestions from the respondents to inform proposed Welsh Government actions.

3. Findings

3.1 Whilst each online response and consultation event brought up discrete issues, there was a degree of commonality in terms of the issues identified. The key findings are summarised below according to the six consultation themes and their component actions (with an infographic summary provided in the Executive Summary, Figure 0.1). For transparency, key headlines from each of the events are provided as an Annex (C-F).

Overall impressions

- 3.2 There was general positivity towards the themes and actions proposed within the 'Beyond Recycling' consultation to move Wales towards a circular economy.
- 3.3 Within the online responses, it was viewed that movement towards the strategy could be bolstered by the hoped for 'green recovery' from Covid-19, and emerging 'build back better' narrative, capitalising on the increased public focus on developing Welsh resilience, the economy, and local supply chains.

“There is considerable potential for making use of the current coronavirus emergency to help people and communities focus on what we use and consume and how we interact with our environment.”

3.4 For the success of the strategy, a key element raised in the consultation process was its reliance on a nation-wide culture change and a shift away from a consumerist society. However, respondents were uncertain as to how such a shift towards a different economic model could be generated in isolation, without a UK-wide or global transformation.

3.5 Citing the need for transformative change, respondents also highlighted the strategy's reliance on new policies considering circular economy outcomes. The importance of a cross-departmental response was stressed to prevent siloed thinking surrounding the concept. Multinational businesses called for the alignment of policies beyond Wales when this is possible, whilst other respondents called for the Welsh Government to take control of domestic supply chains.

3.6 Suggestions for overall strategy improvement included:

- Ensuring the final strategy is radical and ambitious. The ambition should not merely be to 'move towards' a circular economy, but to *create* a circular economy, with greater urgency than a 2050 target.
- An increased focus on the waste hierarchy. There was concern that recycling (or downcycling, more specifically) was the centre of the strategy, an action which does not adequately reflect circular economy principles.
- Increasing the measurability, quantification and definitive nature of proposed targets. There was concern that the strategy lacked detail on the exact content and scope of plans, for example how proposed plans will dovetail with current workstreams, as well as how plans will be achieved.
- Consideration of how the strategy can link to existing and future Welsh and UK wide policies – including the Well-being of Future Generations Act.
- Stronger links between the strategy and actions to combat the climate emergency and reduce carbon emissions.
- Greater clarity and consideration of how cross-border businesses and imported goods will be impacted by the strategy.
- A clearer plan on how the strategy can drive a change in consumer attitudes and behaviour.

Building on our recycling record



Become the world leader in recycling: We will work to achieve the highest rates of household recycling in the World, working with local government, and transform the recycling of commercial, and industrial and construction waste.

Theme headlines

- *A standardised and consistent recycling collection service is important.*
- *Extending the range of recyclable materials is necessary.*
- *Recycling must be easy, supported, and accessible to domestic and non-domestic premises.*
- *The focus on recycling needs to be aligned with the wider aims of a circular economy which prioritises keeping items in use.*
- *Investment in recycling infrastructure needs to support longer term aims such as re-use, repair and remanufacture.*
- *The value of recyclate and market confidence in recycled materials needs to be increased.*
- *Extensive monitoring and continual review of the recycling approach is essential.*

Analysis

- 3.7 Overall, there was recognition that the progress made in Welsh recycling to date is worthy of praise, and there was general positivity towards the Welsh Government's proposed plans to move 'beyond recycling'.
- 3.8 Within this theme, two key issues were consistently raised, firstly regarding the implementation of local authority targets and, secondly, the overt emphasis on the headline 'to become the world leader in

recycling'. Some respondents perceived a focus on increasing recycling targets as potentially counterintuitive to the aims of a circular economy. Much reference was made by respondents to the principles of the waste hierarchy and concerns that priority on high recycling targets are an extension of a linear economy, obscuring the prevention, repair and re-use targets that should be the focus when moving towards a circular economy. Due to Wales' already strong recycling record, the ambition to become a world leader was viewed as unnecessary by some within the face-to-face consultations.

“Recycling as a circular economy measure needs to be treated with caution as it can lead to ... lower quality of those materials, compared with other circular economy measures. If material quality degrades during recycling, this measure would be more accurately called ‘downcycling’ than ‘recycling’. Downcycling is considered a last resort among circular economy measures and needs to be minimised as a wasteful practice.”

3.9 There was consistent support for the review of the Collections Blueprint with general opinion stressing the need for common standards to underpin regional approaches - accommodating local differences as necessary. Consistency in recycling was viewed as important for reducing confusion amongst consumers, producers and those visiting from other areas, particularly amongst authorities with high visitor numbers (e.g. Pembrokeshire and Gwynedd). Furthermore, the benefits of efficiency of scale, coordinated amongst regions, could help with the development of infrastructure and the procurement of resources. Suggestions to support the Collections Blueprint included:

- 💡 Identifying best practice in local authority collection to be implemented across Wales.
- 💡 Implementing common recycling standards to underpin a regional approach.

- 💡 Increasing consistency in packaging, labelling and communications between businesses, domestic premises and construction services.
- 💡 Ensuring local authority access to the same recycling processing plants.
- 💡 Establishing a structured body/regional hub/coordinated network to aid consistency and efficiency, and to establish new markets.
- 💡 Utilising durable, eco-friendly and uniform kerbside collection methods.

3.10 There was support for extending the range of materials collected (e.g. nappies, carpets, drinks cartons) and developing consistency between domestic and non-domestic recycling. However, there was concern that the strategy was primarily focused on municipal waste streams which were considered a small proportion of waste in Wales. Suggestions of other streams included:

- 💡 Organics and green waste – materials which hold circular economy opportunities (carbon products, aerobic digestion, soil regeneration etc).
- 💡 Agricultural waste.

3.11 There was clear agreement that plans and infrastructure enabling the efficient sorting of materials was paramount for a circular economy. However, there was a diversity of opinion on where sorting should take place; either with the consumer, or at primary and secondary sorting facilities.

3.12 To increase recycling support for citizens, respondents stressed the need for increased accessibility and education on recycling, including:

- 💡 Increasing access to recycling centres – both in terms of opening hours and geographic eligibility (including across authority boundaries).
- 💡 Increasing recycling infrastructure in houses, neighbourhoods and towns. For example, mobile community collection units, in-town recycling hubs and on-the-go recycling.

💡 Increasing information (via labelling and advertising) of what materials are recyclable. This is particularly necessary in premises with short-term residents such as students (Bangor), tourists (Pembrokeshire and Isle of Anglesey) and renters (Wales-wide). Respondents perceived that the landlord should be held responsible for recycling in these instances.

3.13 Respondents agreed the need for more business support (particularly SMEs), to help them recycle, and to assist them save and make money on the shift to a more circular economy. Suggestions for business support included:

💡 Removing gate fees for business recycling.

💡 Increasing the cost for business to send their waste to landfill.

💡 Implementing a business recycling certificate to enable recognition of good practice.

3.14 It was recognised that an increase in materials collected would require a matched increase in infrastructure and resources for processing. A note of warning was also raised in that over-investment in recycling infrastructure might create a perverse dependence on recycling, when a circular economy approach should instead lead to a drastic future reduction in recycling capability once principles take hold. Nevertheless, increased infrastructure was stated to require:

💡 Supporting Local Authorities to increase infrastructure and its accessibility.

💡 Implementing chemical recycling plants to deal with hard to recycle materials, particularly plastic wastes.

“The proposal for increased minimum statutory targets on local authorities post 2025 can only be supported where there is long term security in the markets and suitable sorting and reprocessing infrastructure available for the various recycling streams.”

3.15 In relation to the need for improved infrastructure, a number of respondents (particularly from businesses) emphasised the importance of retaining value in recyclate through a quality recycling process, to support retention and market confidence in recycled materials. Suggestions included:

- 💡 Increasing the value and quality of recyclate.
- 💡 Producing food-grade quality recyclate.
- 💡 Producing healthcare-grade quality recyclate.

3.16 Within the online responses, there was a strong call for increased monitoring and continued review and modification of the recycling approach, as well as a realisation of the value of, and need to collect, data. Explicitly:

- 💡 Analysing current material in the market and material flow to inform future activity, create better transparency and grounds for enforcement.

Supporting prevention and re-use



Make more efficient use of our food: We will lead the way in eradicating avoidable food waste by looking at the whole supply chain and working with businesses from farm to fork to minimise waste and maximise resource efficiency.

Prioritise the purchasing of wood, remanufactured and recycled content: We will prioritise the use of wood and recycled content as well as prioritising re-used and remanufactured content in the goods that the public sector procures.

Theme headlines

- *Prevention and re-use are key elements to achieving a circular economy.*
- *To achieve prevention and re-use, future policy needs to create an economic and cultural shift.*
- *Working with communities and social enterprises is essential to support the growth of the re-use and repair sectors.*
- *Businesses require advice for the eco-design of products.*
- *Education and engagement in circular economy concepts is key.*
- *Food waste needs to be tackled and surplus recognised as a resource.*
- *Donation of surplus equipment should be carried out by all sectors - private, voluntary and public.*

Analysis

- 3.17 There was overwhelming support for the aims and actions outlined in this theme, from both online and face-to-face respondents. Prevention and re-use were considered a priority over recycling, as key elements to achieve a circular economy. However, respondents also

emphasised the scale of the cultural and economic change required in this theme to successfully establish a circular economy. Culturally, stakeholders emphasised the need for a change in production practices, consumption patterns, and business and consumer behaviour. In terms of an economic shift, stakeholders stated the need for reorganisation of markets and access to finance to incentivise the adoption of waste reduction measures by businesses. The need for stronger commitments was repeatedly identified in this theme, rather than a 'wish list'.

3.18 Many respondents outlined the potential strategic use of well-established community re-use initiatives and social enterprises. Existing examples were stated of repair cafés, re-makeries, a library of things (e.g. Benthylg in Cardiff) and men's sheds. However, it was highlighted that such initiatives were currently limited in capacity and required considerable coordination and support to provide the community engagement and services required for a circular economy approach. To support the growth of the sector further, ideas included:

- 💡 Legislating for social enterprises to receive the local government savings they have enabled. This was part of a widely called for proposal to place communities at the heart of a circular economy and develop and maintain links between the third and public sectors. Such a proposal also removes delivery responsibility from Local Authorities, who may lack the necessary skills and experience.
- 💡 Increasing financial support for the sector to increase operations in rural areas.
- 💡 Overcoming issues that prevent the resale of products (such as fire safety).
- 💡 Incorporating initiatives into existing household waste recycling centres.
- 💡 Situating circular economy initiatives in areas of high footfall (such as a library of things in close proximity to supermarkets).

- 3.19 It was strongly believed across the public consultation events that businesses and the supply chain needed increased advice, particularly around eco-design of products, to support prevention and re-use. Proposals included:
- 💡 Promoting the right to repair¹¹, encouraging durability and increasing access to modular parts in products.
 - 💡 Lessening the cost of repair and increasing the cost of new materials – reliant on adapting business models away from the sale of new products; possibly towards a “goods as a service” model.
- 3.20 In terms of promoting re-use, respondents questioned the focus on the public sector for donations. Whilst the focus was viewed as a starting point, it was stated that for a successful circular economy, the private and voluntary sectors needed to be encompassed too. Nevertheless, existing good practice within the publicly funded bodies sector – such as the UniGreenScheme (an asset resale service for universities) – were noted.
- 3.21 Face-to-face and online respondents were unanimous in their belief that education and engagement are key to achieving a circular economy, aiding the cultural shift needed to match any transformation of markets. It was repeatedly emphasised that the values of a circular economy should be embedded in schools, beyond just incorporating them into the curriculum. Suggestions were:
- 💡 Expanding on the eco schools and Sustainable Schools Framework.
 - 💡 Making circular economy concepts (beyond recycling) a mandatory aspect of the Welsh curriculum.
 - 💡 Providing facilities at school to educate in waste prevention, repair, re-use and recycling including composting, food growing and anaerobic digesters.

¹¹ <https://repair.eu/>

- 💡 Educating adults (as well as children) in circular economy concepts.
- 💡 Developing currently absent skills necessary for re-use and repair through the establishment of training courses and diplomas (e.g. green apprenticeships).
- 💡 Collaborating with existing third sector and public sector organisations (e.g. Keep Wales Tidy, Repair Café Wales, Friends of the Earth).

“Give every child in every school in Wales experience of redesigning goods and services for the circular economy from the age of 3 so that they build the mental and technical muscle of how to fix the entire system and influence parents.”

3.22 There was general consensus that food waste is a considerable problem and that a large proportion ends up in residual waste. Food waste was discussed both in terms of minimising its quantity and making use of any waste products. The following suggestions were made:

- 💡 Increasing pressure on supermarkets to:
 - Reduce bulk offers
 - Reduce packaging
 - Offer single portion sizes and loose food
 - Provide labelling on how to reduce food waste and recycle packaging.
- 💡 Increasing education to consumers on necessary/unnecessary food waste and providing information on how to store and utilise food efficiently (e.g. ‘use it up recipes’) via national and local campaigns and initiatives (e.g. incentivising the use of food caddies). The work of organizations such as WRAP were regularly cited as exemplars, including WRAP and IGD’s Target Measure Act Roadmap as a source of recommended action.
- 💡 Increasing markets for seasonal and local food and looking at ways to incentivise this.

- 💡 Re-establishing crops previously grown in Wales.
- 💡 Providing financial support for those who sell food to ensure appropriate quantities are produced.
- 💡 Promoting the use of digital apps, particularly in rural areas.
- 💡 Redistributing surplus food and leveraging the work of community action groups, such as community fridges to tackle food waste and alleviate food poverty.
- 💡 Installing networks of local composters.
- 💡 Rescuing value from food waste (which cannot be redistributed) for energy production (anaerobic digesters and biogas) and soil regeneration.

Driving innovation and materials use



Prioritise the purchasing of wood, remanufactured and recycled content: We will prioritise the use of wood and recycled content as well as prioritising re-used and remanufactured content in the goods that the public sector procures.

Theme headlines

- *Innovation needs to be stimulated to develop circular economy appropriate products, create a strong economy, and increase producer responsibility.*
- *Business supply chain requirements need to be considered and overcome.*
- *Focus should be on promoting the most appropriate materials for purpose, determined via a Life Cycle Assessment.*
- *Transparent information and legislation should be provided on materials to ensure informed consumer decisions can be made.*

Analysis

- 3.23 Across the consultation, respondents agreed that the sustainable use of materials was necessary to move towards a circular economy and emphasised the role of innovation in aiding this.

“If we are to achieve a circular economy it would be more useful to think about the start of the production chain, and work from there. A circular economy strategy would have very little mention of waste and recycling, if it does so, it is treating the symptom, rather than the underlying problem, which is design.”

- 3.24 Whilst respondents were generally in agreement on the materials focused on in the strategy, some concerns were raised. Firstly, ‘unnecessary’ plastic was viewed as highly subjective and that

demonisation of the material should be avoided. Secondly, it was felt that bioplastics were a divisive issue. Whilst some were in agreement for increasing the role of bioplastics as a material within a circular economy, others were concerned about the lack of composting infrastructure and the land and chemicals needed to grow the crops that would be processed into bioplastic. Thirdly, whilst the use of wood was viewed as more sustainable and in line with the Woodlands for Wales strategy¹², concern was raised with its sourcing, plantation location and high-water footprint. Therefore, suggestions included:

- 💡 Carrying out a Life Cycle Assessment (LCA) on all materials to ensure the most appropriate material for purpose is utilised (considering carbon footprint, durability and end of life treatment options).
- 💡 Communicating a material's carbon footprint via labelling and educating consumers on what it means – enabling consumers to make the most environmentally friendly and informed purchase decision.
- 💡 Enhancing the information provided on the role of wood in the circular economy.
- 💡 Providing clearer definitions of plastics and bioplastics.
- 💡 Including other materials for focus – particularly those which may cause future problems - based on data (not driven by public opinion). Suggestions included textiles, batteries, construction materials, mined materials, packaging, renewable energy infrastructure components and toxic materials.
- 💡 Communicating the overall impact of materials, particularly in the face of the predicted increase in demand by 2060.
- 💡 Increasing legislation and limiting which materials (including types of plastic) can be utilised in production.

“We are concerned that the use of bioplastics may simply replace one unsustainable product with another.”

¹² Welsh Government, Woodlands for Wales: The Welsh Government's Strategy for Woodlands and Trees, 2018

“It is crucial to conduct a case-by-case Life Cycle Analysis when introducing circular economy measures such as re-use, to avoid unintended environmental impacts.”

3.25 Concern was raised by respondents surrounding how issues with business supply chain requirements would be overcome. Therefore, suggestions included:

- 💡 Establishing markets for secondary materials.
- 💡 Providing Government support (financial and information) to businesses.

“The circular economy is a transition. And it is meant to be a rather harsh and at times disruptive transition, it is meant to leave companies doing things the old way simply going out of business.”

3.26 Developing innovation was considered by respondents to enhance sustainable products, contribute to a stronger Welsh economy and increase producer responsibility, reducing the waste generated. However, whilst the value of innovation was highlighted, it was also emphasised that it needed to be justified and targeted towards creating a circular economy, as the overall aim should still be to reduce consumption. Areas for innovation focus were suggested as:

- 💡 Enhancing development of biodegradable packaging.
- 💡 Focusing on materials that remove plastic from waste streams (e.g. hemp, wood, wood, materials made from recycle).
- 💡 Encouraging design based on recyclability, durability and end of life treatment options.
- 💡 Using innovative products to develop a new circular economy brand – Recycled/Remade Wales.
- 💡 Increasing development of innovative, virtual models (such as apps) which utilise minimal physical materials.

3.27 To stimulate innovation, respondents suggested:

- 💡 Stimulating innovation through national competitions and funding for graduate start-ups.
- 💡 Considering how innovation is supported and what barriers prevent innovative proposals being taken forward.

“We would like to see the Welsh Government work with educational institutions, the private and public sectors and NGO’s to institute a new Solving Waste Solutions (SWS) competition for people and businesses in Wales to come up with waste solutions...The winner(s) would then work with universities and Welsh businesses on an accelerator scheme to bring these ideas to fruition. This would help stimulate not just interest in the issues and solutions, but also potentially help new ‘start-ups’ in Wales and maybe even provide wider solutions for other countries

Using Government levers

Phase out single use plastic: We will make Wales

become the first country to send zero plastic to landfill. We will press ahead with game changing reforms including introducing Extended Producer Responsibility for packaging, a Deposit Return Scheme for drinks containers, and applying bans or restrictions to phase out the use of unnecessary, highly littered, single use plastic.

Take full responsibility for our waste: We will take full responsibility for our waste in Wales, ensuring that we do not export waste to be a problem elsewhere. We will work in partnership with other parts of the globe to help them tackle their waste issues.

Theme headlines

- *The Welsh Government has an important leadership role in Wales' transition to a circular economy.*
- *Improving resource efficient procurement within the public sector is a positive first step towards circular economy principles.*
- *Extended Producer Responsibility is key to promoting more responsible changes at design level.*
- *As a large primary producer of waste, resource efficiency in the construction sector is an essential focus.*
- *The introduction and effectiveness of a Deposit Return Scheme (DRS) in the context of an already high recycling nation will need careful design.*
- *The implementation of legislation on materials should be based on Life Cycle Analysis and be implemented at a UK level.*

➤ *Incineration is incompatible with a circular economy in the long term. Therefore, action should go beyond an incineration tax to an incineration ban.*

Analysis

- 3.28 Respondents were receptive to the use of Government levers, believing that joined-up action across Government could have the greatest impact.
- 3.29 The strategy's success was deemed dependent on sufficient political will and leadership to implement and carry out actions. Therefore, respondents predominately agreed that improving resource efficient procurement within the public sector is a priority area. It was viewed as a good first step, where immediate progress can be made, moving away from 100% cost-based procurement to consideration of public good and circular economies. It was also suggested:
- 💡 Expanding the model applied at public sector level to encompass the entirety of its supply chain.
 - 💡 Reviewing the model applied at public sector level and scaling it out to other sectors (charities, businesses, food, retail, social enterprises).
- 3.30 There was strong support for the use of Extended Producer Responsibility (EPR), with respondents viewing it as in line with the polluter pays principle, enforcing environmental externalities and prompting more responsible changes at design level. EPR was generally preferable to a direct tax on use of certain materials. Larger manufacturers preferred the idea of EPR being applied along the supply chain, whereas retailers believed there should be a single point of compliance further up the supply chain.
- 3.31 Respondents were interested in the effective implementation of a Deposit Return Scheme (DRS). Whilst a DRS was acknowledged as having beneficial impacts across Europe, its effective applicability in Wales was questioned. Due to Wales' existing high recycling record, the potential expense and carbon footprint from establishing a DRS

was perceived as counterintuitive by some. Local authorities also expressed concern that the DRS scheme may hamper their recycling targets. Therefore, to minimise potential adverse effects, suggestions included:

- 💡 Properly considering the interaction between a new DRS and the kerbside collection of these materials from households in Wales
- 💡 Ensuring the DRS did not negatively impact on businesses who facilitate the scheme.
- 💡 Ideally, managing the DRS system under one UK body to ensure coordination.

“A DRS could undermine existing collections and reduce overall recycling performance.”

3.32 The focus on the construction sector was also viewed as a key area for action, as it is a primary producer of waste, with a large carbon footprint associated with the production of new materials. To enhance success, the following suggestions were made::

- 💡 Focusing construction on high quality, eco-efficient and durable buildings near local amenities.
- 💡 Retrofitting and increasing durability of current buildings.
- 💡 Increasing the use of secondary aggregates in construction.
- 💡 Carrying out LCA to utilise most applicable materials.
- 💡 Implementing carbon taxes on new buildings.
- 💡 Working with construction boards such as CITB to set targets on actions.
- 💡 Stimulating initiatives such as the housing innovation programme to support innovation.

3.33 There was support for the implementation of policy instruments to enhance the transition towards a circular economy. However, some respondents stressed that the materials that the instruments were applied to should be based on an LCA, be targeted at areas with the largest environmental impacts and not disadvantage Welsh industry

and economic competitiveness. Therefore, it was queried whether legislation needed to be at a UK level to ensure a level playing field. Concern was also raised in the public consultation events how businesses, such as take-aways, could be supported and provided with appropriate information in order to make informed alternative choices if key materials were banned. Options of levers explored included:

- 💡 Banning *all* unnecessary single use products.
- 💡 Banning adverts that promote single use products.
- 💡 Implementing the equivalent of a latte levy on single use items.
- 💡 Implementing the equivalent of a sugar tax on single use items.
- 💡 Taxing products based on life-cycle assessments.
- 💡 Implementing an ecological tax on products with the largest environmental impact.
- 💡 Introducing financial rewards/subsidies for environmentally friendly actions which could contribute towards community funds.
- 💡 Analysing which levers are most effective for changing behaviour.
- 💡 Information provision and labelling.

“The banning of or proposing taxes on single-use plastics, such as carrier bags or cups/cutlery, is an important tool that a government can use to de-incentivise and prevent the use of such materials. However, it is highly important that such measures are supplemented by initiatives that encourage the re-use of materials and products, rather than switching from one single use resource to another.”

- 3.34 Whilst stakeholders agreed with disincentivising incineration and recognised that an incineration tax may lessen the market for the non-recycling of waste, it was frequently stated that a tax does not go far enough. In moving towards a circular economy, respondents viewed less waste would be generated and, therefore, the presence of incinerators would be incompatible with the concept. Furthermore, with issues of greenhouse gas emissions, air quality and residual ash,

stakeholders argued that the strategy should instead ban or phase out incineration, rather than implementing a tax to reduce its use.

“To be a zero waste and zero emissions national, a circular economy cannot truly exist with the continuing presence of incinerators destroying finite materials. We call for incinerators to be decommissioned by 2030.”

Enabling communities and businesses



Enable communities to take collective action: We will support citizens and communities to do the small things that add up to making a big difference. We will engage young people so they can actively learn about and be part of resource efficiency action through the education sector and beyond.

Create the conditions for businesses to seize the opportunities: We will support all businesses in Wales to reduce their carbon footprint and become more resource efficient. This will enable our businesses to save and make money as well as being more resilient and able to compete in new and emerging markets whilst also achieving positive environmental outcomes.

Theme headlines

- *Communities need to be encouraged and supported to take collective action and develop environmental citizenship.*
- *Businesses need to be provided with support to innovate, adapt and showcase their actions towards a circular economy.*
- *The concept of Zero Waste Towns is welcomed but requires refinement in terms of definition and scale to have meaningful impact.*

Analysis

- 3.35 There was strong agreement that communities need to be both encouraged and supported to take collective action and develop environmental citizenship. A wide range of existing communities' activities in support of the circular economy were cited, although there was a general perception that this could be leveraged through support and co-ordination to deliver greater effect, including collaborations between private, public and third sector and a system of sharing best practice and learning. Suggestions included:

- 💡 Spreading the eco-schools concept and teacher resources throughout the curriculum and community.
- 💡 Involving extra-curricular groups in teachings such as Scouts, Army Cadets and Guides.
- 💡 Increasing education on the value of resources.
- 💡 Increasing the support offered by Local Authorities and the Government to aid circular economy-focused community groups.

3.36 It was widely felt that a focus on businesses should be a priority, with support provided to innovate, and that circular economy issues should be built into all forms of business support. Counter to this, there was some suggestion however that the wellbeing agenda should be the driving force behind any development towards a circular economy, rather than business.

3.37 Several respondents called for incentives for businesses that demonstrate good practice, with increased regulation where encouragement fails. Suggestions included:

- 💡 Requiring large businesses to appoint a circular economy officer with responsibility for monitoring processes and performance.
- 💡 Implementing a star rating for resource efficient waste performance for businesses to inform customers.
- 💡 Creating circular economy accreditation to increase business aspirations and allow consumer comparability.
- 💡 Sharing information about products (production and disposal) through digitisation (e.g. QR codes) or labelling.
- 💡 Demonstrating the economic benefits of transitioning to a sustainable model.
- 💡 Sharing best practices in circular economy actions through the creation of support networks and information/innovation exchange hubs, both pan-Wales and internationally.
- 💡 Implementing applications for procurement based on the environment – natural versus currency capital.

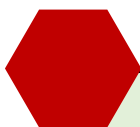
- 💡 Encouraging business collaboration via network creation to capitalise on circular economy practices and minimise waste and potential financial disadvantage.
- 💡 Creating a standardised list of good business practices for distribution, to be reinforced by circular economy business support officers.

“Done correctly, it can stimulate the local economies, create jobs and build more cohesive communities.”

3.38 Although there was general support for the concept of Zero Waste Towns with their potential to consider existing town assets – notably community groups engaged in good practice (e.g. repair cafes, community fridges) – and act as a tourist attraction, there was some scepticism around their practicality and concern they could become ‘gimmicky’. It was questioned whether the concept would be better applied to communities as opposed to whole towns, the feasibility of maintaining community involvement and how it could be achieved in areas with lower socio-economic status. Caution was also expressed in term of alienating businesses through the ‘zero waste’ epithet. A few ideas were suggested:

- 💡 Consideration of whether a zero-carbon town is more important than zero waste.
- 💡 Providing advice and guidance to encourage zero waste behaviours. For example, publication of best practice examples such as Zero Waste Europe, Surfers against Sewage.
- 💡 Considering how wider rural settlements could be incorporated into the concept.
- 💡 Developing inter-town competitions to demonstrate progress and ‘twinning’ with likeminded towns in other countries.

Investing in infrastructure



Invest in clean technology for materials collection: We will modernise the way we collect the material from our homes and businesses to reduce transport emissions of carbon dioxide and improve air quality by introducing zero emission vehicles and investing in the infrastructure to renewably charge and power them.

Theme headlines

- *To enable zero waste and low carbon, regional and accessible infrastructure and community hubs are needed to deal with priority materials.*
- *Resource efficient transportation for waste management is needed, including in rural areas.*
- *Young people, schools and circular economy stakeholders should be represented in decisions regarding infrastructure implementation.*

Analysis

- 3.39 Across the events and online consultation, there was less focus on actions relating to establishing physical infrastructure to support the circular economy.
- 3.40 With regard to infrastructure for transitioning to zero waste and low carbon, a wide range of suggestions were put forward. Regional working was seen as very important, possibly with a set of tiered and linked responsibilities at regional (including city regions), local authority and community levels. The establishment of regional hubs would enable local infrastructure to deal with priority materials, with the belief that it would increase public accessibility and the quality of the recycle and reduce the overall level of infrastructure required.

“Working regionally and more locally with individual communities is essential”.

3.41 Respondents stressed the importance of establishing community infrastructure relating to the circular economy. Despite concerns that the demise of the high street reduces the viability of such infrastructure, it was also viewed as offering the potential for neighbourhood regeneration. It was emphasised that infrastructure should be future proof and consider the change in priorities towards prevention and upcycling and away from downcycling. Proposals included:

- 💡 Establishing town-based composters.
- 💡 Discounting the rent for start-ups relating to the circular economy.
- 💡 Reinvesting money from fines (see Government levers) into establishing community circular economy infrastructure (circular investment fund).

3.42 The implementation of resource efficient, circular economy infrastructure was advocated, such as:

- 💡 Increasing energy efficient transportation for waste collection, including the viability of electrification in rural areas and optimising vehicles on rural routes by serving dual purposes (e.g. post and deliveries).
- 💡 Implementing EV charging infrastructure.
- 💡 Implementing the necessary infrastructure to encourage re-use in new houses, particularly joint storage spaces for sharing materials and products.
- 💡 Creating a road map to phase out incineration.

3.43 In terms of deciding appropriate infrastructure to implement, respondents desired a greater representation of young people in decision making and saw a role for schools in policy making. In addition, many thought it important that circular economy

stakeholders should be a permanent feature in all decision-making bodies.

Other questions

- 3.44 There was a perception that a localised circular economy could build or strengthen opportunities in Welsh speaking communities. It was seen as essential that all technical guidance is translated into Welsh to support this.
- 3.45 There was a suggestion that using Welsh language and Welsh culture as an integral part of the 'identity' of the initiative would be a highly effective way to help support and promote the Welsh language.

4. Conclusions

- 4.1 Overall, most respondents and attendees at events were positive about the proposals being made and the implementation of a circular economy strategy in Wales.
- 4.2 The engagement approach to seek views and ideas from respondents and attendees was welcomed as interactive and engaging.
- 4.3 Particularly evident within the events was that whilst many problems with achieving the circular economy were identified, solutions often struggled to be found. However, from the data gathered from the online and face-to-face consultation, suggestions of particular note going forward include:
- The need to consider and highlight the waste hierarchy and circular economy principles in implementing and prioritising actions (e.g. deprioritising actions such as recycling and incineration).
 - Utilising the role of the Welsh Government in instigating change, through Government levers, providing support to communities and businesses, and aligning actions with wider Welsh and UK policies.
 - The need to increase information, both on the circular economy as a concept and how materials, products and practices can support it.
 - The need to make informed decisions regarding material consumption and use via the carrying out of Life Cycle Assessments.
 - The role of collaboration between communities and businesses (both in Wales and internationally) to share best practice and ensure the feasibility of actions.

Annex A: Summary of stakeholders

Annex B: List of organisational responses

Listed below is a complete set of organisations or membership groups that responded to the Beyond Recycling Consultation.

- ACE UK
- Alupro
- Anaerobic Digestion and Bioresources Association
- Anois
- Argoed Community Council
- Association of Convenience Stores
- Automatic Vending Association
- Benders Paper Cups
- Benthylg
- Biffa
- Bike to the Future
- Black Star and Monkey
- British Glass
- British Plastics Federation
- British Soft Drinks Association (BSDA)
- BSNA
- Budweiser Brewing Group
- Busy Fingers
- Buttington Incinerator Impact Group
- Campaign for the Protection of Rural Wales
- Canton Repair Café
- Cardiff Community Energy
- Cardiff Greenpeace
- Cardiff University
- Celtic Horizons Community Litter Picking
- Centre for Health Economics and Medicines Evaluation
- Chartered Institute of Waste Management (CIWM)
- Chemical Industries Association
- Circulogic

- CITB
- Conwy CBC
- Crosskeys My World My Home Group
- Cultivate
- Cwm Harry
- Danone
- Dusty Forge Repair Cafe volunteer organiser
- Dwr Cymru
- EEESafe and LocalitEEE
- Electrical Safety First
- Etoeto
- Facadeclick
- FareShare Cymru
- Farmers Union of Wales
- FCC Environment
- Flintshire County Council
- Food and Drink Federation
- Friends of the Earth
- Frugalpac
- FSB Cymru
- Garth Hillside Organic Garden
- Green Stream Flooring
- Gwasanaeth Amgylchedd Williams Envi
- Hay Festival
- Huhtamaki
- IBERS
- IEAP
- Impact Recycling
- INCPEN
- Keep Wales Tidy
- Landworkers Alliance
- LARAC (The Local Authority Recycling Advisory Committee)

- Liquid Gas UK
- Llandidloes Labour Party
- Lucozade Ribena Suntory
- Marine Conservation Society
- Mineral Products Association
- Mold Plastic Reduction Steering Committee
- Mold Town Council
- Monmouth Council
- Montgomery Energy Group (voluntary climate change awareness raising group in Montgomery, Powys)
- NafW Public Accounts Committee
- National Trust
- Natural Resources Wales
- Natural Source Waters Association (formerly the Natural Hydration Council)
- Nestle UK & Ireland
- Newport Council
- One Planet Life
- Paper Cup Alliance
- Pembrokeshire Association of Voluntary Services
- Pembrokeshire Coast National Park
- Pembrokeshire County Council
- Pentyrch Community Council
- Pontydysgu Ltd
- Pupils to Parliament
- RECOUP
- Regeneras
- Region Superfos Beverage Systems
- Repair Cafe Wales
- Resident of Chepstow and Coordinator of Plastic Free Chepstow
- Robert Owens Community Banking
- ROCKWOOL Ltd

- Royal Society of Chemistry
- Salvation Army Trading Company Ltd
- Serco-Superfast Business Wales
- Severn Wye Energy Agency
- SUEZ
- Sustainable Consumption Institute, University of Manchester
- Sustainable Wales
- TFSR Cymru
- The J Trust
- The One Planet Centre
- The TYF Group
- The University of Manchester
- The Vegan Society
- Timber Procurement Executive
- Too Good to Waste
- Torfaen CBC
- Torfaen Litter Champions
- Town Councillor Chepstow
- Transition Bro Gwaun
- Trydan Cfy
- Veolia
- Wales Co-operative Society
- Wales Environment Link
- Wales Green Party
- WCVA
- Welsh Environmental Services Association
- Welsh Retail Consortium
- Wentlodge Community Council
- WI
- Woodknowledge Wales
- Wrexham CBC
- Ymlaen Moelyci Cfyngedig

- Zero Waste Europe
- Zero Waste Intl

Annex C: Headlines - Bangor Consultation, 27th February 2020

1. Overall impressions

1.1 Definitions of key terminology:

- Circular Economy – increased education on the definition required.
- Waste – as soon as something is categorised as a waste, it is treated as such. Therefore, materials should be classed as a 'resource'.

1.2 Appropriateness of core themes:

- The six themes contain a lot of 'right' elements.
- Improvements:
 - More definitive actions. Currently, the stated actions within each theme read more as objectives.
 - Taking of a holistic approach. The themes are presented as separate, yet they all require a key element of culture change.
 - Reflect the waste hierarchy. Recycling is indicated to be the main focus but there should be an acknowledgment within the document of the waste hierarchy.
 - Increase measurability. More targets and milestones to help the aims within the document to be achieved.

2. Theme: Building on our recycling record

2.1 Appropriateness of suggested actions:

- Recycling should not be projected as the best practice – downcycled products still have large environmental impacts.

2.2 Consistency in recycling arrangements across Wales:

- A need for cohesion surrounding which items can be recycled in Wales and where.
- Currently, recycling is highly dependent on variable local authority infrastructure which creates confusion with a moving population.

2.3 Suggested further actions:

- Removal of barriers to recycling – accessibility, funding, information.
- Increase pressure on producers.
- Widen the waste stream focus.
- Develop targets for all, including private / commercial businesses.
- Development of on-the-go recycling.

3. Theme: Supporting prevention and re-use

3.1 Actions to further promote the work on prevention and re-use:

- Development of infrastructure and funding to support volunteers:
 - Repair shops / cafes
 - Libraries of things
 - Skills building.
- Business networks – how can one businesses waste benefit another.
- Influence industry. Increasingly, it is difficult to repair goods – lack of access to parts etc – and things are not built to last.

3.2 Development and expansion on the work in schools on waste prevention and re-use:

- Essential, a circular economy needs promotion and education.

3.3 Steps to avoid food waste:

- Education – awareness campaigns around food waste, best before versus use by.
- Promote digital apps
- Pressure to supermarkets – prevent offers (e.g. 3 for 2), increase their responsibility.
- Local composters.
- Increase financial support for companies who produce and sell food.

3.4 Suggested further actions:

- Increase responsibility. Push for increased responsibility across the whole supply chain and widen focus beyond just the public sector.
- Enhance quality control systems to minimise waste.
- Review legislation which can be a barrier to re-use (e.g. portable appliance testing (PAT), fire safety).
- Incentivise re-usable products.

4. Theme: Driving innovation and materials use

4.1 Materials to be focused on:

- Focus should be on single use materials / products as a whole. Not solely single use plastic.

4.2 Necessity for design changes in products:

- Prevent plastic-phobia of already existing product.
- Ensure support so that all businesses can produce products that are recyclable/re-usable.
- Promote durable designs with the potential for remodel.

4.3 Suggested further actions:

- Supply chain transparency. Products and their materials to have clear carbon footprint communication (e.g. number of uses required).
- Using learnings from businesses on minimising waste.

5. Theme: Using Government levers

5.1 Priority on resource efficient procurement within the public sector:

- Need for broader procurement focus, also within the private sector for the strategy to work.

5.2 Priority on material use and resource efficiency in construction:

- Questionable aspiration of only 90% recycling target.
- Construction industry often overbuy – is there potential for being charged for waste items that could have been recycled?

5.3 Suggested further actions:

- Consideration of a sugar tax equivalent to encourage producer responsibility.
- Accreditation to ensure consistency and comparability in waste management practices.
- The need to evaluate effective policy instruments and learn from other countries (e.g. Pay as you throw).
- The necessity of better enforcement and policing of waste management.

6. Theme: Enabling communities and businesses

6.1 Business support for resource efficiency as a priority:

- Focus on education and information sharing to all stakeholders is key.
- The need to support people beyond the usual suspects.

6.2 Zero Waste towns:

- Nice concept.
- Issues with the definition – gimmicky – and absence of a clear standard.
- Issues with its applicability to more deprived areas.

6.3 Suggested further actions:

- The term 'communities' should not just be seen as a location, there should be a focus on supporting virtual communities as well.
- Increase the focus and role of digitisation and apps.
- Provision of training so informed support is available.

7. Theme: Investing in infrastructure

7.1 Regional working for resource efficiency:

- Importance of considering the needs of rural communities.
- Investing in efficient and cleaner infrastructure to prevent lock ins (e.g. hydrogen versus diesel vehicles).

- Optimise vehicles and invest in bin stores for collections on rural routes.

7.2 Suggested further actions:

- How will infrastructure be developed to cope with emerging technologies such as batteries?
- Ensure approach on incinerating waste for energy is clear.

Annex D: Headlines - Narberth Consultation, 5th March 2020

1. Overall impressions

1.1 The document is heading in the right direction.

1.2 Improvements:

- Suggested actions are currently very general.
- Increase the strategy's links to carbon emissions – currently not strong enough.
- Strategy requires cultural change, but it is unclear how this will be generated.

2. Theme: Building on our recycling record

2.1 Consistency in recycling arrangements across Wales:

- There is a need for uniformity for what can be recycled across Local Authorities.
- Standardise recycling – similar to a food standard.

2.2 Suggested further actions:

- Removal of barriers to recycling – education and accessibility (particularly for holiday lets and students).
- Replicate home recycling processes for businesses.
- Increase motivation to recycle – rewards.

3. Theme: Supporting prevention and re-use

3.1 Key theme to the circular economy.

3.2 Actions to further promote the work on prevention and re-use:

- Promote durability of goods within industry.
- Connect a network of farms to share waste facilities (composters).
- The necessity of a spokesperson to promote re-use (the David Attenborough effect).

3.3 Suggested further actions:

- A plan to deal with the health and safety implications of purchasing someone else's waste materials.

4. Theme: Driving innovation and materials use

4.1 Materials to be focused on:

- Focus should be on single use materials / products as a whole (e.g. single use drinks cups, whatever material they are made of). Not solely single use plastic.
- Plastics needs to be more granular – e.g. focus on bioplastics.

4.2 Necessity for design changes in products:

- Prevent the demonisation of plastic, only ban the 'bad' forms.
- Product design is important – should promote aspects such as cardboard labels.
- If plastic is required, only types which are fully recyclable should be available.
- Provide funding to young company start ups with innovative design ideas.
- Promote modular designs.
- More information on packaging as to what the material/product contains so consumers can make informed choices.
- Product requirements to contain a certain level of recycled materials.

4.3 Suggested further actions:

- Supply chain transparency. Communicate the carbon footprint of materials.

5. Theme: Using Government levers

5.1 Priority on resource efficient procurement within the public sector:

- The Government's role is to lead by example.

5.2 Suggested further actions:

- Charge for single use items (as seen with the carrier bag charge).

- Ensure all companies are under the same legislation.
- Tax on products with environmental costs.

6. Theme: Enabling communities and businesses

6.1 Business support for resource efficiency as a priority:

- The necessity for all businesses to be involved.

6.2 Suggested further actions:

- A sharing hub – where best practices can be swapped and shared.

7. Theme: Investing in infrastructure

7.1 Regional working for resource efficiency:

- The role of collection hubs as opposed to house collection.

Annex E: Headlines – Chepstow Consultation, 9th March 2020

1. Overall impressions

- 1.1 The final strategy needs to be radical and ambitious.
- 1.2 The importance of culture change:
 - Strategy needs to make caring cool.
 - Can the strategy develop a new Welsh brand - a Green Nation?
- 1.3 Improvements:
 - The strategy requires quantification
 - The definition of circular economy is still complex. The focus should be on waste prevention.

2. Theme: Building on our recycling record

- 2.1 Appropriateness of suggested actions:
 - Recycling is important but it shouldn't be at the strategy's centre.
- 2.2 Consistency in recycling arrangements across Wales:
 - The need for uniformity across Wales.
 - Communication about what items can be recycled (labelling?).
- 2.3 Suggested further actions:
 - Increase accessibility to facilities (cross border issues, bins in towns, opening hours, council tax).
 - Reward people for recycling.

3. Theme: Supporting prevention and re-use

- 3.1 Development of infrastructure and funding to support volunteers:
 - Repair shops/ cafes.
 - Develop a focus on skills building and addressing the skills gaps – currently absent from the strategy.
- 3.2 Steps to avoid food waste:

- Education – unnecessary vs. necessary waste, hidden food waste.
- Pressure on and work with supermarkets – increase loose items and remove bulk offers.
- The potential role of community digesters – requires financial support.

4. Theme: Driving innovation and materials use

4.1 Materials to be focused on:

- Phase out single use products as a whole.

4.2 Necessity for design changes in products:

- Confusion regarding the emphasis on wood – should be deprioritising finite materials rather than prioritising wood.
- Support for design innovation through funding.

4.3 Suggested further actions:

- Increase understanding of the product – why and how a material is selected.
- Opportunity for new branding – ‘Recycled / Remade in Wales’.

5. Theme: Using Government levers

5.1 Priority on resource efficient procurement within the public sector:

- The importance of the Government leading by example.
- Correlation of Government action to the Well-being of Future Generations Act.

5.2 Suggested further actions:

- Welsh labelling standards – focus on durability and/or recyclability.
- Support for ‘sticks’ – incineration taxes, Extended Producer Responsibility (EPR).
- Improve access to information – not purely for children.
- Provide support to enable businesses to come together and collaborate.

6. Theme: Enabling communities and businesses

6.1 Business support for resource efficiency as a priority:

- The need to support shops which promote resource efficiency (e.g. zero waste) as they are unviable in the current high-street climate.

6.2 Zero Waste towns:

- A potential tourist attraction. Circular economy could aid high street regeneration.

6.3 Suggested further actions:

- Creation of a knowledge exchange area / network. Could be a physical place where items can be stored and exchanged.
- Implementation of a challenge support fund to aid community groups focused on the circular economy.

7. Theme: Investing in infrastructure

7.1 Suggested further actions:

- Increasing housing's ability to store and manage waste.
- Develop spaces that will support the circular economy (community hubs, joint composting facilities).
- Investment in green transport – charging points, hydrogen fuel.

Annex F: Headlines – Mold Consultation, 12th March 2020

1. Overall impressions

- 1.1 To achieve the aims of the strategy, it requires a culture change and the reduction of consumerism. Education is vital, along with dissemination and innovation – gamification of recycling messages?

2. Theme: Building on our recycling record

- 2.1 Appropriateness of suggested actions:

- 2.2 Consistency in recycling arrangements across Wales:

- The need for uniformity across Wales – both in what can be recycled and the infrastructure necessary.
- Communication about what items can be recycled.

- 2.3 Suggested further actions:

- Shift of emphasis to what is not recycled, rather than what is. (Issue of high proportion of a large amount of waste recycled; focus on reducing waste overall).
- Increase accessibility to facilities (mobile recycling centres, in-town recycling hub, information on where recycling occurs).
- Collaboration with businesses and countries to learn and share best practices on recycling.
- Identify which items are poorly recycled and develop strategies to focus on increasing their recycling rate.
- Increase the market for recycled materials in Wales.
- Develop models for attributing recycling to specific communities to encourage participation through competition. Poland rewards towns that perform well.
- Need for targets in the strategy
- More action on business recycling.

3. Theme: Supporting prevention and re-use

3.1 Supporting prevention:

- Build on the right-to-repair. Address issue of repair costing more than purchase price. Support moves towards service-based model of leasing.
- Focus on targeting the supply chain to increase product durability.
- Record sales at second hand shops to quantify the circular economy.
- Support development and acknowledgement of repair skills in communities.

3.2 Steps to avoid food waste:

- Increase collaboration between Governments, producers/manufacturers and supermarkets.
- Pressure and work with supermarkets – increase the availability of loose items.
- Increase the price of imported foods to encourage local and seasonal purchase.
- Education to teach people to cook and to use leftovers.
- Revisit best before/ use by dates to drive more informed choice

4. Theme: Driving innovation and materials use

4.1 Materials to be focused on:

- Phase out single use products as a whole.
- Wood for housing and other construction.
- Sheep's wool for insulation.

4.2 Necessity for design changes in products:

- Research biodegradable packaging that can decompose after a sell by date is reached.
- Introduce recycling competitions to stimulate new designs.

4.3 Suggested further actions:

- Encourage comparability – name and shame / QR codes.

- Encourage the sustainable building of houses from timber (which also overcomes the housing shortage). Can act as a carbon sink and encourage a local economy / short supply chain. Cheaper to transport than bricks / blocks.
- Procurement could specify timber framed – also scope for using planning policy/legislation? (Can specify “low carbon”).
- Role of Wales as a pilot – especially social housing construction.

5. Theme: Using Government levers

5.1 Priority on resource efficient procurement within the public sector:

- The focus should be on sectors with the greatest environmental impact.
- Best value could be based on Natural Capital and Currency
- Need education for procurement professionals

5.2 Suggested further actions:

Taxation:

- Reduce VAT on environmentally friendly products.
- Ecological tax on virgin materials.

Ban single use plastics.

6. Theme: Enabling communities and businesses

6.1 Suggested further actions:

- Creation of a knowledge exchange area / network. Could utilise existing groups such as the WI as a springboard.
- Businesses to achieve a circular economy charter status.
- Using existing networks to drive circular messages (sports clubs, WI, other societies).
- Mechanisms for cascading best practice and sharing.

7. Theme: Investing in infrastructure

7.1 Suggested further actions:

- Increasing construction sectors procurement of recycled materials.
- Support the development of community infrastructure which can support the local circular economy (e.g. buildings for libraries of things).
- Investment in industrial composting facilities
- Barcoding / QR scheme for packaging and other materials to help recycling choices