

## CONSULTATION ON CONSISTENCY ON HOUSEHOLD AND BUSINESS RECYCLING COLLECTIONS IN ENGLAND

### About us

Heart of London Business Alliance serves as the voice of 500 businesses and 100 property owners in the Piccadilly and St James's, Piccadilly Circus and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

### Our Response

All business members that we represent will be affected by the consistency consultation if passed and implemented. Whilst our member businesses already have effective and comprehensive recycling systems operating in their premises in which causes minimal disruption to services, a consistent approach to all businesses in the UK is welcomed. Our business members are currently also recycling food waste voluntarily, without a mandatory drive.

This means that all businesses approached are supportive of mandatory recycling and separating of the waste streams within a commercial waste scope.

Whilst option 3 was selected as the preferred option for waste stream segregation (mixed dry recycling, separate glass recycling, separate food recycling), it was recognised that not all buildings can cope with the potential change and specific caveats would need to be made, particularly in Central London, for very old buildings and or those with spatial constraints. In terms of retrofitting old buildings which are not compliant with the need to store waste appropriately, they would need to be assessed individually before it is mandatory to separate the waste streams.

For new buildings, planning guidance issued by Local Authorities should ensure mandatory waste segregation. Methods to monitor and enforce this to ensure capacity in bin stores is appropriate for the long term running of the building need to be considered.

The occupier lease agreements should also reflect the need for internal waste management systems to be implemented, particularly as this is often outsourced to cleaning/maintenance companies.

Businesses recognise that separation of waste material and sustainable business practice is integral to the reputation of the organisation. For example, if consumers discovered that certain businesses do not recycle it could have a detrimental affect to businesses, particularly as ethical purchasing is becoming a larger factor on consumerism trends. This means that there is already a want to recycle more and demonstrate ethical management practices within the wider business community. Some businesses however may need further training and advice on how to achieve this. If waste segregation becomes mandatory; advice, training and best practice guides should also be considered to ensure an effective implementation of these methods and support offered to building managers and occupiers.

Economically, businesses recognise that it is cheaper to recycle as much of their waste as possible. However, space for storage of separate bins within the premises is at a premium and can affect the affordability of implementing

recycling. This is particularly pertinent for food waste which has specific implementation difficulties that are pertinent across all commercial sectors, not just food, beverage and hospitality. London's spatial needs and older buildings must be taken into consideration when implementing large scale change such as this consultation's proposals.

Smaller businesses and businesses in older buildings with no appropriate space should make adjustments within a defined period to accommodate the mandatory split stream recycling; this could include sharing bin store use in order to implement the change. Waste consolidation such as this is something that we already promote as a Business Improvement District (BID) as shown by [this case study](#) which has proven increased results in terms of recycling and reduced pressure on freight given the number of vehicle movements reduced for this implementation. Solutions such as these should be considered, particularly given the support to improve air quality as promoted by The Mayor of London in order to avoid businesses being exempt.

Business members recognise the educational value of introducing recycling changes to the commercial sector which should not be overlooked. For example, if food waste recycling is mandatory across businesses and residential then it would be a positive behavioural change for people at home and at work, supporting the aims of the consultation and need for the implementation. Best use of these systems in the workplace will help people to be more aware of how they recycle at home. This is a particular benefit given how restricted Local Authority budgets are and the limited amount of education for residents and workers in London on how to recycle. With the biggest transient population in the UK, this is particularly pertinent to improving recycling behaviours. By infiltrating the commercial and worker sector in London, it is envisioned that the knock-on effects of using a well-managed recycling system could also be reflected at household level, across the country. Greater consistency across the country would make it easier for this education to be applicable wherever individuals find themselves, also improving the efficiency of the system nationally.

Businesses would welcome any support available during the transition. Many businesses already have best practice waste management in place therefore would welcome a strategy in regarding to enforcing non-compliant businesses. Container provision, waste storage and education to occupiers would be welcomed. The role of a building manager, property owner and occupiers in the changes will need to be clearly defined prior to any potential enforcement.

Businesses within the BID have also signed up to preferred suppliers for waste management who have a range of expertise to offer their customers. As a BID we would welcome use of the 2 preferred suppliers awarded in the area; Westminster City Council Commercial waste (run by Veolia) and Paper Round. This is because the 2 companies are already collecting from many businesses within the BID footprint. Working with them for educational and audit purposes would help with the introduction and successful running of any new system.

Building managers have also suggested the inclusion of these changes within lease agreements in order to ensure the onus on compliance is shared across buildings with multiple organisations. Internal building infrastructure needs must be considered, and the suggested removal of deskside bins would be welcomed within any guidance/legislation. This is particularly pertinent for any WELL or BREEAM accredited building(s).

In summary businesses are supportive of the change to commercial waste management, with the provision to London needs and practicalities taken into consideration. This relates more particularly to older buildings, internal waste infrastructure in relation to multiple occupiers and the education aspect towards implementing the change.