

## Written evidence from SUEZ Recycling and Recovery UK Ltd

Submitted by Dr Adam Read (External Affairs Director)

### *Introduction*

SUEZ Recycling and Recovery UK (SUEZ) are pleased to respond to this call for evidence relating to issues raised in the National Audit Office's report into local government and net zero in England, published earlier this Summer. Net Zero is one of the most pressing environmental issues facing the UK, and the world, and we are committed to playing our part fully by working with our customers to minimise their waste production, maximise their recycling and recovery of materials and energy and minimising any disposal.

As one of the UK's largest waste and resource management companies providing services to the public and private sectors, we collect municipal and commercial wastes and recycle, and provide sorting, reprocessing opportunities for quality materials, whilst also recovering heat and energy from residual waste streams. SUEZ handles over 11.5 million tonnes of resources and handle resources from a third of UK households and over 28,000 commercial customers. We work with 78 local authorities, providing services from collections to energy recovery and work with them to improve service efficiency, reduce waste and create solutions which benefit local communities across the country. Furthermore, SUEZ has delivered over £2 billion in new infrastructure and service investment in the UK in the last 10 years as we have moved resources out of landfill to recycling and energy recovery.

As part of the global SUEZ group, we are signatories of the Race to Zero campaign and are committed to achieving net zero by 2050 if not before, and by 2030 we aim to reduce direct and indirect greenhouse gas emissions by 45%, and in doing so will contribute to the net zero plans of the local authorities we are working with, as a key component of their supply chain.

In order to achieve this, we are looking at and working across our entire operations and supply chain to reduce our emissions across all three scopes. Some of the actions we have undertaken to date include

- Being one of the first resource company to pilot electric collection vehicles, with the first vehicles soon to enter our commercial fleet.
- Purchasing 100% renewable electricity
- Working with BP to explore carbon capture as part of the Net Zero Teesside project
- Removing diesel vehicles from our company car fleet and introducing our Sustainable Business Travel Policy
- Rolling out the installation of LED lighting across our facilities, which to date is saving almost 9,000 tonnes of CO2 per year
- Generating 1,672,974Mwhe electricity and 390,595MWhth thermal energy in 2020, from waste that cannot be prevented, reused or recycled
- Currently installing solar panels across our sites

We are working hard to deliver a more sustainable future, which includes providing the green fuel needed to help UK industry deliver on decarbonisation. But we are only as good as the waste and carbon passed on to us to process, so we are working collaboratively across industry and Government to ensure the resources sector can play its crucial role in enabling the delivery of the UK's climate targets.

We have sought to be at the forefront of the waste and resources sector for a long time and continue to innovate with our partners in the value chain to ensure we lead the necessary innovations going forward. SUEZ has also looked to actively contribute to the knowledge gap in the waste and resources sector and has published numerous reports (produced directly or through content and financially sponsored reports) which were free to reference and use the data and analysis presented.

For the purposes of this consultation SUEZ would reference the following reports

[Working together towards net zero carbon](#) – summarising our recent webinar series on the importance of a value chain approach to achieving net zero.

[Net Zero is not enough](#) – summarising our perspective on why we need to look beyond net zero

[Economics of Change in the Resources and Waste Sector](#) (2019)

**1. *What should local authorities' roles and responsibilities in reaching net zero by 2050 be? How clear are the expectations about the role of local authorities?***

- 1.1. Local authorities have a duty to protect the environment and public health, and one of their primary functions is to deliver (or manage) their local waste management services (collections, HWRCs, treatment and disposal). We provide part or all of this role for 78 local authorities and in doing so help to minimise the carbon footprint of the authorities and the communities they serve.
- 1.2. However, local authorities have a much wider remit than waste management and many of their other primary functions have the opportunity to contribute to achieving Net Zero and beyond – including local transport, housing (both social and new developments) and through their connection with local communities and businesses.
- 1.3. The expectations of local authorities as delivery agents for Net Zero from broader stakeholder groups (including government departments and local community groups) are unclear, and requires urgent clarification to ensure they are placing their efforts and resources where they have the greatest potential benefit, and to ensure a joined up approach across the public and private sectors. The balance between local delivery and national consistency needs to be considered, to ensure that every local authority provides an equal contribution to the overall picture and that solutions meet and create benefits at a national as well as local level.
- 1.4. One such approach that SUEZ recommends for consideration is the extension of PPN 06/21: Taking Account of Carbon Reduction Plans beyond central government, which would provide a clear statutory commitment for local authorities to embed carbon reduction with their major procurement process.

Local authorities have a key role to play in the UK's achievement of net zero and need clear guidance as to where and how their local efforts link and contribute to the national picture. Resources and waste are a major part of their local service provision and should be considered as part of the net zero pathway at both a local and national level.

**2. *What are the priorities for change or clarification to align the national planning framework with net zero?***

- 2.1. The most important point to raise here is the simple fact that "Net Zero" does not appear as a distinct phrase at all within the National Planning Policy Framework (NPPF) which was just updated and re-released in July 2021. In fact whilst the principles of sustainable development is paramount within the framework, the only real correlation between the two does not appear until section 14 (climate change) of the NPPF where it states "The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure".
- 2.2. SUEZ considers this to be a real disjoint which needs to be rectified. If local planning authorities are looking for national policy to set the benchmark for standards, then it is no surprise that net zero policies are not being filtered down into local planning policies. To date local policies appear to be aspirational and at times optional. For example, planning

authorities are routinely using decision notice information as a way of “encouraging” developers to use more sustainable methods of development rather than incorporating sound principles into local policy and using planning conditions to ensure compliance.

- 2.3. SUEZ is of the view that as a starting point strategic documents need to be using the same terminology, in addition these principles need to be better embedded into national policy so that they represent the most up to date strategic directions which can be relied upon across the planning system.

Local authorities must be accountable for all decisions they make about infrastructure and service provision in their area. As such, decarbonisation and Net Zero principles must be embedded in all land use and strategic decision-making.

**3. *What will need to be in place to ensure that the UK infrastructure bank loans to local authorities for net zero work are as effective as possible?***

- 3.1. This is not an area we have clear evidence to share.

**4. *What funding and resources are available for local authority work on net zero, and what are the priorities for improving local authority funding?***

- 4.1. Local authority budgets have declined year on year for much of the last 15 years. This has resulted in significant gaps in resource and a reduced focus on the delivery of primary, statutory functions only.

From SUEZ’s perspective, work to deliver Net Zero is therefore being carried out in the margins by many, trying to link it to waste and recycling roles, sustainability champions, or the planning department. We are concerned that local authorities do not have the inhouse expertise and/or are not able to give sufficient bandwidth to agreeing the level of resource required or what long term budgets would be needed to drive forward the kind of change we all hope to see. These changes stem from a clear strategic approach as an organisation, linked to policies to inform decision making, which in turn enable the creation of tangible local solutions. Such as those which reduce consumption, including supporting the development of reuse and repair enterprises or connecting local food supply chains. This requires clear investment aligned with strategic objectives across a local authority, underpinned by knowledgeable and capable staff at all levels to enable this to happen and to ensure its effective delivery, something that we not seeing either at all or to the necessary levels by many. We also link back to the need for clarity on the role local authorities are expected to play, aligned with the rest of the public sector as explain in point 1.3.

- 4.2. SUEZ concur with many of the findings from the NAO report, experiencing first-hand serious weaknesses in central government’s approach to working with local authorities on decarbonisation. These weaknesses stem from several issues including a lack of clarity over local authorities’ overall roles, piecemeal funding to date, and diffuse accountabilities. Ultimately, this will hamper any local authorities’ ability to plan effectively for the long-term, build the necessary skills and capacity to deliver on this agenda, and prioritise local effort. Our concern echoes that of the NAO, namely that with more money likely to be

spent on and through local authorities in coming years there is a significant risk in terms of overall value for money of these investments unless these issues are addressed.

Local authorities need a clear strategy which spans their organisation, to ensure a joined up approach and inform decision making, which in turn will ensure investment and funding is used for most effective return. However we are seeing limited examples of this currently, which is in part due to the lack of clear guidance as previously mentioned.

#### ***5. What should government's analysis of net zero funding to local authorities focus on in the next Spending Review?***

- 5.1. Funding to drive greater momentum in local authority action is key, 2050 will be upon us sooner than we like if we do not put the fundamental actions in place soon. Consideration for interim targets and how funding is being used to deliver against these will help to ensure progress continues apace between now and 2050.
- 5.2. We also need to see is clear cause and effect, and transparency on how decisions are being taken to invest / spend on net zero initiatives and what impact they are having.
- 5.3. At present many Government departments have live initiatives, funding sources and support programmes to help drive forward Net Zero, but this can be confusing and chaotic for local authorities when they are looking for focused support. Greater co-operation and collaboration from Government would arguably help to ensure more is done with the monies available. Therefore, an analysis on return on investment will be important, as there are currently so many competing priorities, and lack of clear guidance, providing examples of where gains are being made and public money being spent well will be invaluable.
- 5.4. Traditional Spending Review analysis does not work well with cross / multi departmental initiatives and this must be addressed if the true value of the funding available and its targeted impact are to be captured more accurately going forward.
- 5.5. This also links once again to the need for clear guidance from central government on the role local government is expected to play, and how it can support national ambitions. This requires a joined-up approach to ensure all available funding it being considered and utilised effectively within a local authority area.

#### ***6. How is central government co-ordinating its engagement with local government on net zero?***

- 6.1. This is not clear to those of us who work closely with local authorities at SUEZ, and to date we have seen little evidence of this taking place.

#### ***7. What role can local community groups play in helping local authorities achieve their net zero ambitions?***

- 7.1. The local community will have an important role to play in achieving net zero, from encouraging the take up of local initiatives to being a sounding board for decision making.
- 7.2. Local authorities will need to engage with and build support from their local communities, and with many losing or having over stretched community based resources, this will be a key area for funding to recruit staff and ensure time and resource is invested in bringing the community with them on the journey to net zero, by celebrating successes and helping their residents understand the benefits this brings and the consequences of inaction.
- 7.3. However, community groups should not be seen as a route for service delivery. For example, the nationwide repair café network has successfully demonstrated the benefits of

a repair service to keep electrical goods in service and connect people with their community. However these current rely solely on volunteers, and an occasional event; for these services to become normalised, they must become a successful business to be able to provide an accessible and reliable service for anyone to be able to use when needed. Something that local enterprises across the country are starting to prove is possible.

Community groups will play an important role in every local authority's journey to net zero, but they must be seen for their important role in engaging and connecting with the local community, and not as a means to provide voluntary services at minimal to no cost, which will not contribute the significant changes needed in order to reach net zero and beyond.

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Submitted by Dr Adam Read (External Affairs Director at SUEZ UK) with technical input from Stuart Hayward-Higham (Technical Development Director), Sarah Ottaway (Social Value & Sustainability Lead), Corinna Scott-Ryo (Head of Planning and Property) and Leigh Broadhurst (Environment and Sustainable Development Lead) on 26<sup>th</sup> August 2021.

We (SUEZ) would welcome the opportunity to discuss our ideas and feedback with the Committee if the opportunity arises.

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