

A Circular Economy Roadmap to Deliver a Zero-Waste UK

This briefing is on behalf of environmental coalition Wildlife and Countryside Link ([Link](#)) and sets out measures needed to create a circular economy.

Executive Summary

- Set a target to halve the UK's material footprint by 2042.
- Create a Joint Unit, led by Defra and DESNZ, to support work towards a circular economy and a zero-waste economy by 2050.
- Introduce fiscal incentives to support a transition to a zero-waste world, focusing on the economic opportunities arising from a Circular Economy.

We are facing a triple planetary crisis. Climate change, biodiversity loss and unfettered pollution are driven by an unsustainable model of production and consumption. [Globally](#), over 55% of carbon emissions and 90% of biodiversity loss and severe water stress are caused by [resource extraction and processing](#), throwing nature into freefall. We need a rapid shift away from our unsustainable linear 'take, use, throw' industrial system, to a new, Circular Economy which will contribute to conserving England's natural environment, reducing our overseas impact, driving domestic economic growth and supporting over a decade of national renewal.

We welcome the Government’s commitment to Circular Economy Roadmap, an essential step towards delivering a zero-waste economy by 2050. End-of-life waste management and recycling improvements have been the primary focus of recent policy development, but these solutions contribute to maintaining the status quo and will not achieve the whole-system changes needed for a sustainable economy. Current policy thinking has leaned heavily on the “polluter pays” environmental legal principle. However, the [“prevention and rectification at source”](#) legal principles are essential to environmental protection, but these have yet to be leveraged to any degree in relation to driving a Circular Economy.

This paper outlines three recommendations for the Government’s Circular Economy Roadmap, to ensure it achieves its goal of delivering a zero-waste economy by 2050 and create the infrastructure for the whole system change. It provides sectoral analysis and outlines where current policies must go further (see Annexes 1 and 2). We recommend further analysis is undertaken for agricultural systems. Only by establishing a clear direction of travel will the Government be able to set a consistent, stable regulatory framework for businesses to deliver sustainable economic growth across the UK. This process will require ever greater collaboration and compromise across stakeholders but can ultimately lead to a faster, more efficient roll out of circular economy measures.

Halving the UK’s material footprint

The UK consumes more than its fair share of planetary resources, with the majority of the negative environmental and social impacts arising from resource extraction and processing often offshored inequitably to poorer regions of the world. The UK’s materials consumption per capita rose from 13.9 tonnes in 2020 to [16.5 tonnes in 2021](#) yet the recommendation is to limit this to [6 to 8 tonnes per year](#). Working in conjunction

with the Devolved Administrations, setting a target to halve the UK's primary material consumption would be consistent with meeting this recommendation. This target, underpinned by measures to enable a shift to a Circular Economy, will serve to protect nature and biodiversity, mitigate GHG emissions, minimise human harm and ultimately work towards a zero-waste future. Acting as a 'north star,' a material footprint reduction target would drive innovation and investment in a sustainable green economy. Furthermore, establishing sector specific standards, accompanied by interim monitoring and reporting obligations, would focus the minds of the most resource intensive industries. This could be implemented swiftly using powers established in the Environment Act S.1 (1) and would give government departments, businesses and their supply chains assurance of a clear direction of travel. Measures to reach these material footprint reduction targets could then be developed and rolled out at pace contributing to deliverables under a new Circular Economy Roadmap. Fundamental to these objectives is the need to require businesses to disclose their material consumption and waste footprints, and to put in place transition plans to achieve the targets. See Annex 1 for more information on the current legislative context upon which to move forward.

Joint Circular Economy Unit

Delivering a Circular Economy Roadmap requires highly integrated policy and decision-making. This means all government departments and delivery bodies must be aligned behind a shared mission. When government departments engage in formal policy sharing agreements, it results in a more strategic, efficient and effective joined up approach to implementation. An effective example of this is Defra and DfT Joint Air Quality Unit (JAQU), set-up in 2017 to overcome the [lack of 'incentive or framework ... to work together to devise a long-term strategy \[to tackle air pollution\].'](#) Born from the inability of the Inter-Ministerial Steering Group to make sufficient progress on the topic, the EFRA Committee suggested that a cross-department unit, mandated through the Cabinet Office, was the sole way government targets would be met.

In 2020, the Government announced a series of circular economy policies. However, the measures were spread across six different departmental strategies and six Government departments and agencies. This created a lack of clarity for overall delivery co-ordination. To focus efforts, we recommend Defra & DESNZ immediately establish a ‘Joint Circular Economy Unit, which works hand in glove with the Devolved Administrations.’ Like JAQU, a Joint Circular Economy Unit would have a mandate to hold all associated government departments e.g., DBT & HMT, to account for their role in achieving Circular Economy related targets. It would also ensure relevant departments and agencies are clear in their duty to consider circular economy measures in policy development, with the aim of mitigating both domestic and overseas climate impacts and restoring biodiversity and nature both at home and abroad. A Joint Circular Economy Unit should also further scrutinise policies relating to the circular economy across all departments to ensure they form a coherent set of complementary actions.

Financially Incentivising Success

Creating a stable regulatory environment is essential for attracting investment and shifting consumer behaviour to deliver the once-in-a-lifetime systems change needed to deliver upon a Circular Economy Roadmap. The Government must use all legislative and policy levers at its disposal to facilitate this shift. The Government has historically fallen short in utilising fiscal measures to promote a circular economy. Introducing fiscal changes to promote circularity could be revenue-raising for the government while also incentivising the necessary changes. The Plastic Packaging Tax, introduced in April 2022, is an example of a recent policy effort to incentive businesses to shift their behaviour and adopt the use of recycled content. However, as an isolated fiscal measure, it has yet to deliver the required systems shift it sought to achieve. The following recommendations could provide additional financial incentives to deliver this important transition.

- Make use of the single-use charging powers in Section 55 of the Environment Act 2021, especially to discourage use of more commonly littered items and incentivise the uptake of reusables.
- Evolve the ‘Plastic Packaging Tax’ to become a “Virgin Material Tax” across all materials. This would prompt businesses to consider alternatives to virgin material use and single-use material applications, jumpstarting domestic secondary material markets across the UK, supporting thousands of jobs and providing confidence for green infrastructure investments.
- VAT relief for businesses opting for more circular economy activities, e.g., removing VAT on retrofitting activities that preserve or [improve the environmental performance of a building](#). This would address the financial imbalance in investing in new, resource intensive products and their circular economy equivalents and support the objective within the Government’s Warm Homes Plan.
- Develop public and private finance initiatives to fund required systems infrastructure to support a Circular Economy, identifying sectors where advanced thinking and voluntary initiatives are already taking place, e.g., [refill in supermarkets & in-store repair options](#).
- Fiscal disincentives for downstream waste management, e.g., introducing an incineration tax, adding Energy from Waste to the UKETS, and/or removing waste incineration from the energy mix to make public and private financing of upstream Circular Economy activities more attractive. This measure should be strengthened by a commitment to a moratorium on permitting waste incineration sites.
- Ensure the National Wealth Fund & [UK Infrastructure Bank’s investments focus away from the waste sector](#) towards upstream Circular Economy activities.
- Introduce subsidies for local businesses setting up services which align with Circular Economy objectives consumers e.g., clothes rental services, repair shops, furniture refurbishment to increase availability and bring down the cost to consumers.

Conclusion

Globally, unsustainable models of production and consumption are threatening our natural world. By prioritising the value of resources once they are no longer wanted or needed, we are continuing to contribute to the 55% of greenhouse gas emissions caused by extractive practices. The Government's Circular Economy Roadmap must enhance the value of resources from the point of extraction right through to reframing waste as a valuable resource. Industrial processes would require fewer virgin materials from the outset and the longevity of materials can also be supported through designing products for repair and reuse. Resource efficiency across all sectors can double with the right regulatory framework in place. This world-leading, transformational systems change must also place halting biodiversity and nature loss on the same footing as emissions reductions, creating new opportunities for a modernised resource management industry and sustainable economic growth. A well thought-out Circular Economy Roadmap, adopting this paper's recommendations, is essential to the delivery of a zero-waste economy and must be a central pillar in the Government's delivery programme.

Annexes

1. Summary of current policy landscape
2. Analysis of current policy landscape by sector
 - a. Packaging, plastics & single-use items
 - b. Construction and demolition
 - c. Textiles

- d. Chemicals and critical materials
- e. Electrical and electronic equipment
- f. Bulky items
- g. Batteries
- h. Food waste
- i. Fishing Gear

Annex 1:

Current Policy Landscape

Under the 2021 [Environmental Improvement Plan](#), the Governments committed to eliminating all avoidable waste and doubling resource productivity by 2050. This led to the publication of the Resources and Waste Strategy for England in which policymakers outlined how to “preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.” By placing emphasis higher up the waste hierarchy, resources could be kept in use for longer and overall material consumption would decline; businesses and consumers would be incentivised to ‘reduce & reuse’ rather than ‘recycle and dispose’.



In 2021, the Environment Act placed the ambitions of the Resources and Waste Strategy on a legislative footing and enshrined post-Brexit environmental protections into law. Entitled [Waste and Resource Efficiency](#), Chapter 3, Part 3 established powers to create a framework for a more resource efficient economy which could be deployed across the length of the supply chain and the breadth of UK industry. These included:

- [Producer Responsibility](#): obliging producers to fund the cost of managing their products at end-of-life.
- [Resource Efficiency](#): measures relating to resource efficiency information (for consumers) and requirements for producers, deposit return schemes for any industry and charges on single-use items including single-use bags.

- [Managing Waste](#): separated waste collection (Simpler Recycling), electronic waste tracking, hazardous waste treatment and trans-frontier shipments of waste (waste exports)
- [Waste Enforcement and Regulation](#): enabling charging and enforcement across the waste management system.

Additionally, through secondary legislation, Environment Act targets were adopted, and they include a target to [halve residual waste \(excluding major mineral waste\) by 2042](#). In 2023, these were followed by the publication of Defra's [The Waste Prevention Programme for England: Maximising Resources, Minimising Waste](#) and the DESNZ [Unlocking Resource Efficiency Research Programme](#).

However, progress in introducing proposed measures from across the Government's strategies has been slow, with flagship policies such as packaging EPR subject to substantial delays. The long-awaited Deposit Return Scheme, which was announced in 2018, has recently been delayed for a fourth time, in large part due to an inability to seek consensus across UK Devolved Administrations. These delays have been coupled with an overall watering-down of ambition to move policymaking away from end-of-life waste management towards a new circular industrial model. [The House of Commons Public Accounts Committee Report from December 2023](#) acknowledges that "while the Department (Defra) recognises the importance of waste prevention and reuse, it is not clear what its plans are for meeting its target of doubling resource efficiency by 2050", further noting concerns from stakeholders "that government has not given waste prevention and re-use sufficient priority."

A new Government must prioritise preventing waste at source and increasing resource efficiency across all industry sectors. Any sustained focus on end-of-life waste management will only perpetuate a narrative of short-termism, insecurity and disregard of the natural world. The Environment Act remains the right legislative vehicle to drive through the upstream measures needed to create a Circular Economy and zero-waste society.

Annex 2:

Sectoral policy analysis

a. Packaging, plastics & single-use items

Current Policy/State of Play	What are the difficulties in implementation?	What should the Government do?	Circular Economy Improvements
<p>Deliver a Deposit Return Scheme for plastic & PET bottles, steel and aluminium cans and other in scope drinks containers. In April, the Government delayed DRS until 2027. Defra is currently working with industry to set up a Deposit Management Organisation to run the scheme.</p> <p>With a series of delays to this policy, the UK has fallen</p>	<p>The long-awaited Deposit Return Scheme, which was announced in 2018, has recently been delayed for a fourth time and is now due to start more than half a decade after the powers were given by the Environment Act. Despite support throughout the consultation process from business and industry, glass has been excluded from England and NI's schemes. The case for this is based on perceived costs and operational complexities relating to businesses handling glass. The glass industry also has concerns that the quality of material returned via a DRS</p>	<p>Introduce DRS as soon as is practicable.</p> <p>Mandate the inclusion of glass across all UK DRS. Should the UK DRS go forward without glass in scope, the policy will lack ambition and will be out-of-date on introduction.</p> <p>OR</p>	<p>A primary objective of this policy is to tackle litter, therefore enabling the collection of the most highly littered packaging items (beyond drinks containers) would be welcome.</p> <p>Given the required infrastructure</p>



<p>behind other nations that successfully operate a DRS, driving high recycling rates and improved material quality returning to the system.</p> <p>N.B. This is a devolved policy area but interoperability between all four UK nations is essential.</p>	<p>will be compromised. This challenge must be resolved to deliver an interoperable system.</p> <p>Trials of a Digital DRS (DDRS) have also taken place to permit kerbside recycling for beverage containers. Some stakeholders are calling for this to be included from the outset.</p>	<p>Accelerate delivery of DRS without glass to 2025 and commit to introducing glass into DRS by 2030.</p>	<p>investment, consideration for how reuse systems can be enabled via a DRS would support a meaningful shift to a circular economy.</p> <p>The scope of Germany’s DRS includes reusable containers, with deposit levels set at different rates to incentivise positive consumer behaviour.</p>
<p>Packaging Extended Producer Responsibility (pEPR) measures, including a “bonus malus” modulated fee</p>	<p>Several measures proposed in the 2019 and 2021 consultations have been delayed. These include:</p>	<p>Commit to the introduction of Phase 1 pEPR by Jan 2025 (as per current timetable).</p>	<p>Introduce modulated fees to promote packaging</p>



<p>structure, is due to commence from Jan 2025. In preparation for this, in-scope businesses have been required to report their packaging data from April 2024.</p> <p>pEPR is the most ambitious and challenging policy of the packaging waste reforms. As a UK-wide policy, the devolved governments have worked closely to align on the details.</p>	<ul style="list-style-type: none"> - Business payments towards Local Authority costs - Litter payments to Local Authorities - Mandatory cup takeback by producers <p>Additional proposals put forward more recently include the offsetting of costs by producers based on what they collect via closed loop recycling initiatives. Currently there is lack of evidence to suggest these initiatives collect a significant volume of material.</p>	<p>Accelerate the work required to establish litter and fly-tipping payments to Local Authorities</p> <p>Develop a clear plan for Phase 2 of the scheme to include:</p> <ul style="list-style-type: none"> - Aforementioned proposals that have been delayed - Increasing the ambition for modulated fee assessments beyond recyclability, considering other material lifecycle impacts e.g. carbon emissions, biodiversity and nature impacts. - Much paper and board food packaging has been identified as containing ‘forever chemicals’ PFAS so improving chemical transparency and traceability for all packaging is important, particularly as products that do not contain harmful chemicals 	<p>designed for reuse and recyclability.</p> <p>Commit to ringfencing funds raised by the scheme to go towards enabling reuse and refill systems as part of elevated Circular Economy ambitions.</p>
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		<p>are available and to future proof any system.</p> <ul style="list-style-type: none"> - Clear incentives for producers to shift towards reuse and refill systems. - Modulated fee structure to reflect sustainable material sourcing considerations e.g. more favourable fees for FSC-certified paper and board, ASI accredited aluminium. <p>Increased funding and resources for Government enforcement agencies, e.g. the Environment Agency.</p>	
<p>Plastic Packaging Tax (PPT)</p> <p>Introduced in April 2022, the Treasury-led PPT places a charge on plastic packaging containing less than 30% recycled content. This policy</p>	<p>Defining the scope of the tax faced challenges, with debate relating to the definition of plastic. Currently, bio-based and compostable packaging are within scope of the tax.</p>	<p>Introduce a two-tier charging system for domestic vs, imported recycled materials</p> <p>As per the European Parliament's Committee on Environment, Public Health and Food Safety (ENVI) reject the adoption</p>	<p>Evolve the policy to become a “Virgin Material Tax”</p>



<p>aims to encourage investment into plastics recycling infrastructure and stimulate the end markets for recycled material. The introductory charge was set at £200/tonne and was increased to £210.82/tonne in 2023 with a further increase to £217.85 in 2024.</p> <p>Thus far, it is the only policy in the suite of waste reforms announced in 2019 that has been implemented. The policy raised £276m in FY 2022-2023</p>	<p>Within the current policy, there is no distinction between domestic and imported recycled materials, despite calls for a two-tier charging approach to encourage investment in local infrastructure.</p> <p>More recently, the Government consulted on adopting a mass balance accounting method to allow chemically recycled plastics (emerging technology) to count towards recycled content.</p> <p>It is also well-known that the current level of the tax is such that producers are not incentivised to pursue recycled content, currently citing that “it’s cheaper to pay the tax”.</p>	<p>of mass balance accounting for chemically recycled plastic feedstock.</p> <p>Increase the tax rate to incentivise the desired behaviour shift towards use of recycled content</p> <p>Ensure plastics are included within the scope of the Carbon Border Adjustment Mechanism (implementation due 2027)</p>	
<p>Using data gathered from its 2023 consultation, the Government is exploring</p>	<p>A piecemeal policy approach including bans on single-use plastics items such as stirrers, balloon sticks, straws and</p>	<p>Include payments for litter in pEPR fees so producers pay for the clean-up and</p>	<p>Mandate the use of reusable tableware across all dine-in</p>



<p>options to tackle commonly littered and problematic plastic items. These measures sit outside of the proposed DRS, pEPR and Simpler Recycling policies.</p>	<p>cutlery is inefficient and, in many cases, led to material switching for these items e.g. wooden cutlery, paper straws.</p> <p>Joined-up systems thinking is required to enable shifts to a more circular economy, including consideration for unintended consequences such environmental burden-shifting from one material supply chain to another.</p>	<p>management of littered and fly-tipped items (as above).</p> <p>Introduce EPR for cigarette butts, the most commonly littered plastic items across the four nations. Similarly, introduce EPR for chewing gum which is estimated to cost local authorities £7m to clean-up.</p>	<p>settings, while also putting in place requirements to evidence that this move away from single-use items does not increase overall material usage.</p> <p>Increase the single use bag charge to 25p and mandate minimum charge on for "bags for life".</p>
<p>Implementing an ambitious Global Treaty to end plastic pollution by 2040.</p>	<p>Thus far, as a key member of the High Ambition Coalition, the UK has been supportive of the Global Plastics Treaty and provided valuable input at each stage of the formal negotiation process.</p>	<p>Continue to be a strong advocate for an ambitious global treaty to end plastic pollution, including adopting a full lifecycle approach to tackling this issue (vs. a focus on waste management and recycling)</p>	



	<p>At the most recent International Negotiating Committee proceedings in Ottawa (INC-4), the UK put forward a provision calling for measures to enable reuse systems. Although not discussed in Ottawa, this is a welcome intervention and is due for consideration when negotiations resume at INC-5 in November.</p>	<p>Continue to champion the scaling-up of reuse and refill systems as part of promoting a circular economy for plastics</p> <p>Leverage bi-lateral relationships with other nations to influence their position on the treaty</p> <p>Support global rules within proposed policy mechanisms and measures</p> <p>Support a cap on plastic production</p>	
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b. Construction and Demolition

Current Policy/State of Play	What are the difficulties in implementation?	What Circular Economy Improvements will need to be made?
The Construction and Demolition (C&D)	Government has yet to consult on EPR for construction.	Issues around including C&D waste in the Environment Act target could be addressed by requiring percentage waste reduction.



<p>sector is one of the most resource intensive in our economy. The materials extracted, and the methods of extraction, generally are not in line with our planetary boundaries.</p> <p>While material recovery rate can be high, the quality of recycled materials is low.</p> <p>The Resources and Waste Strategy outlined plans to address the impact</p>	<p>The Environment Act target – to halve residual waste by 2042 – excludes construction waste. This means Government and industry have little incentive to make policy to reduce C&D waste.</p> <p>The case for excluding C&D waste from the Environment Act residual waste target was fairly strong, due to the level it might skew an overall target. Therefore, we recommend introducing a separate resource efficiency target for the C&D sector.</p> <p>The Government’s work on resource efficiency measures acknowledges the barriers to achieving the recommendations. The introduction of resource efficiency targets would accelerate shifts to a more circular economy in this area, including through innovation and creative approaches to building refurbishment vs. demolition and reconstruction.</p>	<p>Establishing sector-specific resource efficiency targets would include introducing C&D material recovery targets which excl. recovery for incineration. This could be followed by upstream measures, particularly at the design stage including</p> <ul style="list-style-type: none"> • Resource efficiency product standards or information schemes regarding existing Environmental Product Declarations. • This could be to ensure, for instance that windows are designed so they can be dismantled to preserve the glass, or precast concrete panels designed so that they can be reused, as well as encouraging a shift towards recyclable materials. • Minimum recycled content requirements for materials used in new development and/or refurbishments/retrofitting (subject to health and safety requirements). • A requirement for all new development projects to submit a Circularity Statement to tackle material shortages in the construction sector and reduce costs of new housing. • Increased focus on opportunities to incorporate circular design and circular living principles to any new or
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<p>of C&D, including consulting on EPR for certain materials by 2025.</p>	<p>While measures in the pipeline seek to promote the decarbonisation of material supply chains there has been little to no consideration for wider impacts such as biodiversity and nature loss.</p>	<p>refurbishment projects, for example a Library of Things, food waste composting, sufficient space for recycling.</p>
<p>Use the National Procurement Policy Statement (NPPS), to strengthen green procurement principles for all public and private contracting authorities.</p>	<p>Resource and funding restrictions placed on DLUHC and Cabinet Office have deprioritised this policy issue.</p>	<p>Update Chapter 2 of the National Planning Policy Framework (NPPF) recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development across NSIP and the TCPA Framework.</p> <p>Cabinet Office Policy Procurement Note ‘Taking account of Carbon Reduction Plans in the procurement of major government contracts’ (PPN06/21 requires bidders for major government contracts to commit to achieving Net Zero in their operations by 2050) must be expanded to include circular economy requirements, including a Material Performance Sustainability Criteria for public procurement.</p>

c. Textiles

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
<p>The Government said that, subject to an impact assessment, we will explore the potential of the following measures for non-domestic premises to support the textiles waste hierarchy and aim to consult in 2024. This includes, but is not limited to:</p> <p>A. A requirement to present reusable and recyclable textiles for separate collection and for the collecting organisation to separately collect and store until treating in accordance with the waste hierarchy, by sorting for reuse and recycling.</p>	<p>Lobbying from the fashion industry and the complex global supply chain for textile products has resulted in many policy challenges.</p> <p>Resource and funding restrictions placed on Defra have deprioritised this policy issue.</p>	<p>Establish a textiles EPR scheme to fund mandatory take back and repair initiatives across the clothing retail sector. This would create thousands of skilled jobs across the country and kick start new repair and re-use infrastructure.</p> <p>As per proposals in the WEEE EPR</p>	<ul style="list-style-type: none"> • Introduce a waste reduction target across the textiles sector. • Make durability, reparability and energy efficiency labelling mandatory to inform consumer decision-making. • Implement an information and education campaign which highlights to the public the impact of ‘fast fashion’ on the environment and the cost savings individuals can make if clothes are re-used, re-furnished or re-paired. • Expanding reuse facilities and leasing, for longer, more intensive use of clothing. This would include enabling producers to offer second hand clothing through resale alongside new sales, widening access to; and increasing



<p>B. Requiring businesses over a certain size to provide customer take back systems for used textiles. We will also explore how to encourage online only companies to partner with brick-and-mortar businesses to ensure the costs of implementing take back schemes are proportionate.</p> <p>C. Banning separately collected material from being sent to landfill and energy from waste without prior sorting. This would bring into scope the destruction of products and material that can be reused, redistributed and recycled, such as returns, surplus and unsold stock.</p> <p>We will also consider whether wider measures to reduce waste generation would be helpful.</p>		<p>consultation, introduce kerbside collections for textiles.</p>	<p>leasing options and improving cleaning, maintenance and quality monitoring.</p> <ul style="list-style-type: none"> • The UK must introduce several policies to encourage repair and reuse including; provide information of repair service to consumers, introduce a UK wide online repair platform and introduce an extension of the liability period of the seller for repair. <ul style="list-style-type: none"> ○ Repair broken products ○ Provide information on repair services for customers ○ Introduce a UK wide repair platform ○ Extend the liability period of the seller for repair. • New infrastructure and systems needed include: Information and education, including labelling for durability, recyclability and the presence or absence of substances of concern • Take back centres and specialist logistics, to support lower cost, shared operations for leasing and to expand clothing recovery schemes.
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			<ul style="list-style-type: none"> Phase out exports of poor-quality textiles waste to non-OECD countries
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d. Chemicals and critical minerals

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?
<p>In 2018, the Government committed to publishing a Chemical Strategy to address pollution and outline the path to regulating chemicals manufacturing in the UK post-EU Exit. The OEP annual report 2023 highlights the government’s failings</p>	<p>It has been six years since the announcement and the Government has yet to publish a Chemicals Strategy. The presence of harmful chemicals in products and materials is undermining efforts to implement a safe circular economy. Some products, such as furniture, have to be incinerated due to the presence of harmful chemicals, while other secondary materials including paper food packaging and bio-solids from sewage sludge are contaminated with toxic chemicals due to their use in consumer products. This creates a costly waste of valuable resources.</p> <p>Not a single restriction on a harmful substance has been adopted in Britain since the departure from EU REACH</p>	<p>Publish an ambitious Chemicals Strategy that puts protecting the environment and human health at its core. It must realise the Environment Act ambition to reduce chemical pollution. The strategy should outline measures to support a circular economy including addressing the use of harmful chemicals, enabling chemical transparency and traceability throughout the supply chain (including secondary materials) and embedding safe and sustainable design principles.</p> <p>The government should look at opportunities for aligning UK REACH with the EU to prevent further regulatory divergence which is resulting in fewer</p>



<p>to act on the Environment Improvement Plan and lack of progress on policies and action to address chemical pollution and the use of harmful chemicals in products.</p> <p>UK REACH was brought into UK law on 1 January 2021 following the 2018 Withdrawal Act. UK REACH regulates chemicals placed on the market in GB. Under terms of the NI Protocol EU REACH continues to apply in Northern Ireland.</p>	<p>(other than an internationally instigated ban on PFHxS). Only three restrictions have been proposed, on harmful substances in tattoo inks, lead in ammunition and PFAS in firefighting foams, but these have not been enacted in the three years since leaving EU REACH. During that period, the EU adopted 9 restrictions or bans on harmful substances in legislation (some wide reaching such as intentionally added microplastics) and initiated a further 16 including a much more ambitious approach to group restriction of over 10,000 PFAS commonly known as “forever chemicals”.</p>	<p>protections for UK citizens and wildlife and creating a barrier for a safe circular economy.</p> <p>Alignment with the EU will reduce costs for industry and create stronger protections for the environment and human health which will support a safer circular economy in the future.</p> <p>The Global Plastics Treaty is a key opportunity to push for transparency on chemicals within the plastics supply chain. The UK must take a leading role in driving ambitious global measures to tackle this growing issue.</p>
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<p>In June 2023, the Critical Mineral Strategy reconfirmed the necessity of shielding the UK from overseas market shocks in relation to the sourcing.</p>	<p>The Government launched a Task and Finish Group on Critical Mineral Resilience, with a clear link being established between critical raw material security and circularity. Yet despite some strong recommendations, the Government has yet to act on enabling greater circularity for these vital materials.</p>	<p>The Government must design a Critical Minerals Recovery Strategy which seeks to implement policies to better recover and process all product categories using these precious materials. This will reduce the UK's reliance on precarious international supply chains. There is also a clear economic opportunity -ensuring British businesses save on virgin material input costs across the board and also supporting the reduction of scope 3 impacts.</p>	<p>Funding for an information campaign on the importance of taking electrical and electronic items to recycling. This could include establishing community collection centres e.g., at repair cafes, while the Government implements the findings from its recently published WEEE consultation.</p>
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e. Electrical and electronic equipment

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
<p>Defra consulted on reforms to WEEE regulations in early 2024. The department also produced a call for evidence looking at how they could encourage better product design, more circular economy business models and increased levels of re-use through reforms of the WEEE regulations.</p>	<p>The consultation focused heavily on reforms to collection and recycling of waste electricals from households and businesses and far too little enabling repair, refurbishment and reuse of items.</p> <p>There was scant consideration for how to prevent electrical and electronic items</p>	<p>Wildlife and Countryside Link submitted a detailed response to the WEEE Call for Evidence and Consultation which can be found here. Producers must be obligated.</p> <p>Introduce measures which prevent built in obsolescence outlined in our response to Defra’s Call for Evidence.</p>	<p>Introduce EU style Right to Repair legislation which would require the Government to introduce mandatory obligations, such as the below list, for producers and distributors:</p> <ul style="list-style-type: none"> • Repair broken products • Provide information on repair services for customers • Introduce a UK wide repair platform • Extend the liability period of the seller for repair • Improve chemical transparency of WEE products <p>Require producers to extend the period for which spare parts are available for product repair.</p>



<p>WEEE is the fastest growing waste stream globally, with the UK currently the second highest generator of e-waste (per capita) globally.</p> <p>While the UK has recycling targets relating to e-waste, it lags behind similar countries in relation to introducing WEEE EPR.</p>	<p>becoming waste in the first place</p>		
<p>Work with DESNZ on future implementation of minimum eco design requirements in</p>	<p>Resource and funding restrictions placed on DESNZ has resulted in this policy issue being deprioritised.</p>	<p>Any new Government must update the Energy Related Products Policy Framework to include eco-design requirements across. These should focus on durability, repairability and energy efficiency and include a requirement to publish a ‘circular economy’ rating, which also includes chemical transparency so consumers can make the most informed choices about the products they buy.</p>	



<p>Great Britain as set out in the Energy-related Products Policy Framework, published in November 2021.</p>			
<p>Consider ways in which to provide consumers and businesses with information on the environmental performance of electrical and electronic products, focusing on material resource efficiency via aspects such as durability, reparability and recyclability.</p>	<p>Initial research has been completed but we are still waiting for it to be published. Without this information in the public domain, policies are unable to progress.</p>	<p>Options include mandating participation in eco rating schemes and other labelling approaches focused on extending the life of products. This would complement existing energy labelling requirements.</p> <p>Explore the role product passports could play, particularly in relation to critical</p>	<p>A consumer campaign should be funded outlining the different options for re-use and recycling of WEEE products. This would help overcome issues with storing of broken and unwanted WEEE products in households and release an influx of items containing critical minerals.</p>



<p>Voluntary industry initiatives exist, for example Eco Rating for mobile phones. However, participation is not mandatory and the methodology adopted is not determined by any regulations.</p>		<p>mineral content and hazardous chemicals.</p>	
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f. Bulky Items (Furniture and Furnishings)

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
<p>Furniture and Furnishings (Fire) (Safety)</p>	<p>The current regulations and flammability testing result in UK citizens being exposed to significantly higher</p>	<p>New regulations should include all evidence submitted and exclude</p>	<p>Updated regulations mean that fewer chemical flame retardants are added to furniture and furnishings thus improving safer circularity of materials.</p>



<p>Regulations 1988 are currently under consultation.</p>	<p>concentrations of chemical flame retardants, compared to other countries, with no clear improvements to fire safety. Legacy chemical flame retardants identified as Persistent Organic Pollutants (POPs) are still found in furniture today and these, as well as their unrestricted substitutes, are linked to cancer, fertility issues and neurological conditions; and have been found in abundance in our environment. Harmful chemicals continue to create a significant barrier to the UK's safe circular economy as demonstrated by the POPs in waste upholstered domestic seating ruling by the environmental regulators which means all POPs-contaminated waste products must be incinerated. This high cost is being borne not by polluters but by Local Authorities and has been exacerbated by the lack of chemical</p>	<p>unrealistic flaming ignition sources in the flammability testing standards and bring smoke toxicity within scope to enable a meaningful reduction in the use of chemical flame retardants and more innovative designs and solutions to fire safety.</p> <p>The government should incentivise improved transparency and traceability through the introduction of dynamic product labelling that includes chemicals. This will help future proof long lived items by identifying chemicals which may be</p>	<p>Ensure dynamic chemical transparency is captured through digital product passports to future proof items and enable re-use where it is safe.</p> <p>Streamline information making it easier for these items to be re-used and re-purposed.</p> <p>Incentivise safe and sustainable by design principles for furniture and mattress manufacturers.</p> <p>Urgent adoption of the precautionary principle in relation to chemicals of concern.</p>
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	transparency and dynamic product labelling.	approved for use now but later found to be harmful and restricted.	
Consult on proposals to remove fees for consumers to have bulky domestic furniture collected from their homes by 2025.	Resource and funding restrictions placed on Defra has resulted in this policy issue being deprioritised.	<p>Working towards the publication of a consultation on home collection of bulky waste items will not tackle the problem of excessive waste bulky items.</p> <p>The Government must instead launch a consultation into an EPR Scheme to ensure producers are financially obligated to prevent and manage the waste arising from their products.</p>	<p>As part of the consultation the Government must consider introducing modulated fees designed to incentivise reuse, repair and recyclability.</p> <p>Commit to ringfencing funds raised through raised by the scheme to go towards enabling repair and refurbishment activities.</p> <p>Obligate businesses to manage historic hazardous chemical waste such as flame retardants.</p>



<p>The Government will consider policy options including eco-design, consumer information and Extended Producer Responsibility (EPR) for furniture.</p> <p>Although The Waste Prevention Programme for England: Maximising Resources, Minimising</p>	<p>We have seen no evidence from the Government that they are progressing exploration of the policies detailed.</p>	<p>Bring forward plans to consider circular economy measures to tackle bulky items such as furniture and furnishings through incentivising safe and sustainable design approaches.</p> <p>As a minimum, align ambition on chemicals which are of high concern with furniture and furnishings (as well as other bulky items).</p>	<p>Consult on eco-design policies for bulky items. Evidence collected could be used to inform EPR policies.</p> <p>Introduce EU style Right to Repair legislation which would require the Government to introduce mandatory obligations for producers and distributors:</p> <ul style="list-style-type: none">• Repair broken products• Provide information on repair services for customers• Introduce a UK wide repair platform• Extend the liability period of the seller for repair. <p>Expand reuse facilities and leasing, for longer more intensive use of furniture and furnishings. This would include enabling producers to offer second hand items through resale alongside new sale, widening access to and increasing leasing options and improving cleaning, maintenance and quality monitoring.</p>
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<p>Waste includes measures to address this industry sector, there is a need to go further and faster.</p>			<p>Introduce minimum recycled contents for materials most used in bulky items.</p>
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g. Batteries

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
<p>In July 2023, in Defra’s Maximising Resources, Minimising Waste Policy Statement, it committed to bringing forward proposals to reform batteries regulations. It suggested it would seek to legislate these from 2024</p>	<p>There has been no indication that Defra is preparing to undertake a consultation on EPR options for batteries.</p>	<p>Through the Critical Minerals Strategy, the Government must place obligations on businesses to report on the sustainability and supply chain of the primary materials within batteries. This will force greater transparency and support better understanding of critical mineral usage in batteries.</p>	<p>Introduce incentives through progressive tax policies (e.g., introducing subsidies for businesses selling rechargeable batteries) to phase out non-rechargeable batteries across the sector. This will ensure</p>



<p>and implement from 2025.</p> <p>Shortly after, in November 2023, the Department for Business and Trade (DBT) published the UK Battery Strategy.</p> <p>There is currently a 45% battery recycling target in the UK.</p>		<p>Similarly to the EU, the Government must introduce a suite of measures covering the entire life cycle of batteries. This should include;</p> <ul style="list-style-type: none">• Critical mineral recovery targets• Minimum levels of recycled content for EV batteries• Recycling efficiency targets for critical minerals. <p>More information on specific thresholds can be found here.</p> <p>The Chartered Institution of Wastes Management (CIWM) recently published a paper calling for EPR across all waste streams, starting with batteries.</p>	<p>the best possible life span for all new products brought onto the market, and the reduction in critical mineral usage.</p> <p>Minimum recycled contents and increased reachability will promote the expansion of UK battery recycling infrastructure. This must be accompanied by tax incentives for investment in UK recycling capacity.</p> <p>Introduce a requirement for all electronic and electrical products to be sold with rechargeable batteries.</p>
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<p>We will also seek to consult on potential reforms to the End-of-Life Vehicles regulatory regime (ELV). This will begin with improvements to the existing processes being trialled from summer 2023 and, if successful, expanded from 2024, and with a consultation on reforming the wider regulatory regime in 2025.</p>	<p>The Government published an explanatory memorandum on the EU legislation to improve the reusability, recyclability and recoverability.</p> <p>Within the document it is suggested that consideration of amending the GB type-approval scheme to adopt similar type-approval requirements in Great Britain will be informed by any future consultation on the end-of-life vehicles regulatory regime led by DEFRA. We are still awaiting this consultation.</p>	<p>Consult on the EU legislation for End-of-Life vehicles with the view to adopt similar measures.</p>	<p>N/A</p>
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h. Food Waste

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
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<p>Consider options to improve voluntary food waste reporting by large food businesses in England. As outlined in our government response to the consultation which was published in July 2023.</p> <p>The Government committed to reviewing the decision by the end of 2025.</p> <p>The legal definition of food waste is from farm gate to fork. This omits a significant</p>	<p>Approximately 50% of businesses are voluntarily submitting food waste data. This number has been stagnant since the decision was taken to continue with a voluntary approach.</p> <p>While food waste reporting by businesses remains voluntary, there is little incentive for more to adopt this practice.</p>	<p>Implement mandatory food waste reporting across all large food businesses. The Government consultation found that 99% of respondents, including the majority of businesses, supported the introduction of mandating the policy. This could be done through an SI under the Environment Act targets.</p> <p>It is also advised that medium sized businesses are include in scope of this measure.</p>	<p>Mandate a requirement for all food producers to report pre-farm gate food waste which has been estimated at 3.3 million tonnes per year in the UK alone.</p> <p>As part of a series of resource efficiency targets, introduce a food waste reduction target for both pre- and post-farm gate production.</p>
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<p>portion of food waste which occurs on-farm. Globally, this is estimated to be 15.3% of total food loss and waste.</p>		<p>Include a requirement for reporting pre-farm gate food waste.</p>	
<p>Simpler Recycling reforms for food waste from domestic and non-domestic premises.</p>	<p>The Government has decided to allow domestic and non-domestic premises to apply for exemptions to Simpler Recycling regulations to allow for the co-collection of food and garden waste together in one bin or container.</p> <p>This means that the quality of materials collected will be significantly reduced and could prevent them from being processed in the most useful way.</p>	<p>The option to apply for an exemption should be removed.</p>	<p>Greater transparency in reporting how food waste is recycled. A policy of zero incineration of food waste.</p> <p>Incentivise circular applications of organic waste e.g. displacing fossil fuel-derived virgin fertilizer materials with compost.</p>
<p>Provide over £1 million in funding in 2023-24 to support consumer campaigns to help households</p>	<p>A lack of funding means the amount individual local authorities have received to support communication on food waste reduction is limited.</p>	<p>Increase funding to support a communication campaign on the cost-saving impact of reducing food waste.</p>	<p>Collaborate with DfE to ensure primary and secondary school curriculums includes awareness of the importance of food waste prevention.</p>



<p>waste less food. Reducing food waste in the home could help to save the average family with children up to £60 every month.</p>			
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i. Fishing Gear

Current Policy/State of Play	What are the difficulties in implementation?	What can a new Government do to resolve them?	Circular Economy Improvements
<p>Although niche, abandoned, lost or otherwise discarded fishing gear (ALDFG) is one of the most hazardous types of ocean plastic pollution and is of significant global</p>	<p>Due to the scale of Abandoned, lost or otherwise discarded fishing gear (ALDFG) across UK seas and coastal areas, little progress has been made.</p> <p>In March 2022, the Government commissioned a research project to address the issue of marine litter originating from fishing and aquaculture gear. The study</p>	<p>The Government must consult on EPR options by the end of 2024. EPR has the potential to tackle a range of environmental issues associated with the production, use and disposal of products and materials, including</p>	<p>Committing to tackling ALDFG as part of the Global Plastics Treaty will ensure the UK is putting one of the biggest ocean pollutants at the heart of its domestic Circular Economy Roadmap. It will also signal to the international community that inaction is not an option</p>



<p>concern. It poses a direct physical threat to marine life, fisheries stocks, maritime navigation and human safety, therefore improved management strategies are urgently needed.</p> <p>In the Resources and Waste Strategy (2018), the UK Government announced they would consult on EPR for fishing gear by 2022. Its ambition was to match or exceed the measures</p>	<p>involved quantifying gear use and arising waste across the UK, analysing policy options for improving waste management, and conducting economic assessments of these options. The research identified three key policy options: a national mandatory industry-led waste management scheme, mandatory Extended Producer Responsibility (EPR) with take-back measures, and EPR with take-back and government support for improved waste management.</p> <p>Alongside this report, the British Standards Institute has established a committee mirroring the European Committee for Standardisation’s Technical Committee to address circularity in fishing gear.</p>	<p>fishing gear and there is significant potential to integrate it with other policy measures as part of a Product Stewardship strategy.</p> <p>This approach fully considers the value chain and all its participants, designing policy tools to minimise the social, economic, and environmental impacts of products throughout their entire life cycle.</p>	
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Wildlife and
Countryside



<p>outlined in the EU SUP Directive. However, such consultation has not been carried out.</p> <p>This is only an area being considered for a harmonised approach within the Global Plastics Treaty.</p>			
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Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 84 organisations to use their joint voice for the protection of the natural world and animals. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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The following organisations have inputted into this briefing:

- Green Alliance
- WWF
- Keep Britain Tidy
- Fidra
- Wildlife and Countryside Link
- Scottish Environment Link
- Marine Conservation Society
- Whale and Dolphin Conservation