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3 Your organisation

Organisation:

BlindSpot Think Tank

4 Type of organisation

Organisation Type:

Non-Governmental Organisation

5 If 'Other', please specify below;

Specify Other:

6 Do you broadly agree with the proposed role for Government?

No

7 Comments

Comments:

The government have not yet grasped the scope of their role in waste prevention, so it's too early to be talking about reduced intervention.

Government has historically suffered from 3 basic mindset blindspots:

- 1. The scale of ambition. It's hopelessly inadequate to "reduce waste". Failure to design waste out of the economy simply continues an economy where waste is designed in.
- 2. Waste is not just solid waste. Waste is all waste that accumulates in any ecosystem. Dumping to land, air and water is all waste. Climate change is a waste issue and can be managed with precisely the same shifts in mindset and problem-solving.
- 3. The relation between waste prevention and economics is backwards in government thinking and policy. Today's economics cannot create sufficient economic opportunities to prevent waste. Government must see waste prevention as a non-negotiable imperative, set by ecological realities, and embrace their role in setting up the economy accordingly.

The proposed 'non-policy' makes no attempt to recognise or resolve these blindspots. Simple market-based tools are available to governments to correct the historical neglect of waste prevention and to minimise the need for intervention. However I have yet to see any indication that government is inclined to show interest in the above aspects.

8 Do you broadly agree with the proposed role for Business?

No

9 Comments

Comments:

The proposed role for business is indistinguishable from the bland rhetoric that has been circulated over recent decades. It reveals no advance on business as usual and may not be expected to solve any waste-related problems. This is non-policy, a smokescreen for government to abdicate its responsibility to set up the economy to design out waste.

The opportunities for business to prevent waste are blocked in 3 ways:

- 1. Understanding within business is limited by government's vision of resource waste as needing reduction not designing out.
- 2. The commercial opportunities for preventing waste are limited by the prevailing economics where the externalities of waste are largely ignored.
- 3. The competitive position of businesses is weakened by government clinging to the obsolete 'linear economy' model where economic growth is thought to

require continuing waste of resources. The greater interest and effort by other economies in implementing circular economy structurally is an unmet challenge.

The proposed non-policy makes no attempt to recognise or resolve these roadblocks, despite being the responsibility of government

10 Do you broadly agree with the proposed role for Local Authorities?

No

11 Comments

Comments:

The proposed role for local authorities is indistinguishable from the bland rhetoric that has been circulated over recent decades. It reveals no advance on business as usual and may not be expected to solve any waste-related problems. This is non-policy, a smokescreen for government to abdicate its responsibility to set up the economy to design out waste.

The proposed approach neglects 3 ways in which the structures provided to local authorities work against waste prevention:

- 1. The waste hierarchy, emphasising waste prevention, has been available since 1975 but is still misused by waste disposal authorities to emphasise disposal options.
- 2. Waste prevention is the Cinderella of funding. During government austerity policy there is a worsening massive mismatch between the deluge of waste and the trickle of preventive funding.
- 3. Local authority disposal contracts lock-in waste streams to decades of destructive dumping largely by government-led PFI incineration. All the dumped resources become unavailable for productive local use. All the local authorities lose interest in non-disposal options for contracted wastes.

The proposed non-policy makes no attempt to recognise or resolve these structural failures, despite being the responsibility of government

12 Do you broadly agree with the proposed role for others and individuals?

Nο

13 Comments

Comments:

The proposed role for others is indistinguishable from the bland rhetoric that has been circulated over recent decades. It reveals no advance on business as usual and may not be expected to solve any waste-related problems. This is non-policy, a smokescreen for government to abdicate its responsibility to set up the economy to design out waste.

Government has set up 3 market distortions against other organisations playing a significant role in preventing waste:

- 1. Resources that could be prevented or used productively and locally are instead locked into long disposal contracts led by government PFI structures and incentives.
- 2. Funds that could be used for waste prevention locally are diverted into local authority disposal contracts. Hence prevention activities must ask people to pay twice for dealing with the same resource flows.
- 3. The externalities of products designed to become waste, sold by companies making no real effort to prevent waste, are imposing an unfair unrecognised burden on society. This places downstream prevention activities at a competitive disadvantage.

The proposed non-policy makes no attempt to recognise or resolve these market distortions, despite being the responsibility of government.