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The Impact of Brexit On Recycling Practices In the U.K:
The Case of London
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Abstract

Brexit, a portmanteau for 'Britain' and 'Exit', refers to the U.K.'s exit from the European Union (E.U.) following its four-decade-long political and economic union membership. The U.K.'s exit came following the 2016 E.U. referendum, where 51% of its residents voted to leave and 49% to remain. The membership of the U.K. in the E.U. has been a pressing topic in Britain's parliament but was only officially recognised in May 2015, following the release of the Conservative Party's manifesto pledge.

Before Brexit, the U.K. was bound by the union's environmental management guidelines. The E.U. establishes clear objectives to guide environmental policy for its member states. The union denotes that these ensure its members are on a consistent path to environmental protection, conservation, and enhancement.

Articles 11 and 191 to 193 of the E.U.'s treaty indicate that members are bound by its policy goals of "prevention and rectifying pollution at source, and on the polluter pays principle" ¹.

In this paper, I will be exploring the impact of Brexit on changes to environmental preservation and maintenance strategies in the U.K. For my paper, I will focus specifically on managing recycling waste in the U.K.'s largest City, London. I will discuss the impact of Brexit on changes in recycling regulations in the City and analyse the subsequent strategies put into place to address waste management in the City as the E.U.'s regulations no longer bind it. I will conclude by evaluating the City's current strategies compared to the waste management strategies before Brexit.

Introduction

In the past four decades, the U.K.'s membership in the E.U. has played a significant role in enhancing its reputation on environmental policy. In the 1970s, before the U.K. joined the E.U., its largest City, London, was recognised as one of the dirtiest spaces in Europe— primarily

¹ European Parliament. *Environment policy: general principles and basic framework*.

because of tourism. On average, London received about 6.69 million visitors between the 60s and 70s.

However, the U.K.'s membership in the E.U. compelled the City to adhere to the union's strict environmental policies. The principal area the U.K.'s capital, London, struggled with was waste management. In the 70s, before the U.K.'s membership in the EU, London generated over 0.5kg of waste per capita per day; however, the year succeeding its membership, waste fell beneath the City's per capita per day generation ².

1. E.U. Waste Management Guideline

For its members, the E.U. established the E.U. Waste Framework Directive. The E.U. parliament signed the policy into law to protect human health and the environment by preventing and reducing waste generation. According to Section 28 of the directive's preamble, its goal is to establish the E.U. as a recycling society where waste is utilised as a resource.

1.1. The Waste Hierarchy

The E.U. referred to the waste management hierarchy to guide its member states in prioritising waste management. The waste hierarchy, otherwise known as the "Lansink's Ladder", originates from the Dutch parliament member's indication of the order of preference for appropriate action to manage waste.

The directive itself has undergone many amendments, with its most recent version adopted in 2008. Its current version emphasises high-quality recycling and introduces the concept of leading the E.U. into a circular economy.

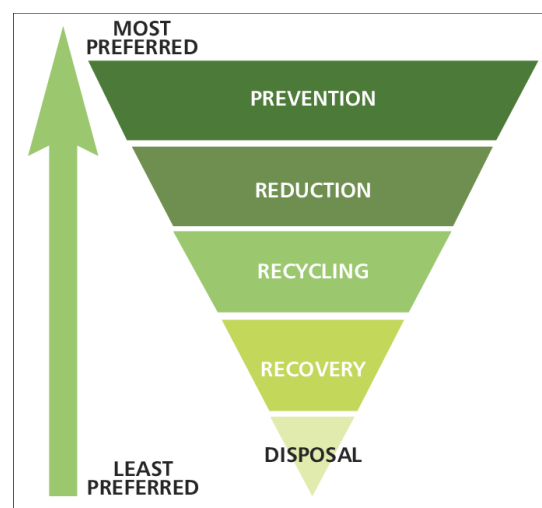


Figure 1: The Waste Management Hierarchy

Source: UNEP (2011)

² Mukhtar, Erni Mariana. (2016). Mukhtar - 2015 - Evolution of waste management systems.

1.2 The Circular Economy

The concept of a circular economy, as defined by the U.S. Environmental Protection Agency (EPA), refers to "reducing material use, redesigning materials to be less resource-intensive, and recapturing "waste" as a resource to manufacture new materials and products".³ This idea of a circular economy was first introduced in the mid-60s by American economist Kenneth Boulding. Since then, it has been referred to globally as the standard approach to resource and waste management.



Figure 2: The Circular Economy

Source: The Biomimcry Institute

For the E.U., the circular economy "is an essential contribution to the E.U.'s efforts to develop a sustainable, low carbon, resource-efficient and competitive economy" ⁴.

³ U.S. EPA. *What is a Circular Economy?*

⁴ Mazur-Wierzbicka, E. (2021). Circular economy: advancement of European Union countries.

The London Environment Strategy is modelled following this circular economy design framework. The City of London recognises the circular economy as "one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste" ⁵. Based on this concept, the London Environment Strategy has been modelled to help the City achieve their sustainability goals.

1.3 London Environment Strategy

The London Environment Strategy spearheaded by Mayor of London Sadiq Khan is the City's first comprehensive plan detailing its approach to addressing environmental challenges.

Developed in 2018, the environment conservation plan presents integrated approaches to addressing London's air quality, green infrastructure, climate change, energy and waste issues. Separated into eleven sections, the plan provides a profile of the City's current strategies and probable solutions to these challenges.

1.3.1 London Environment Strategy, Section 7: Waste

Section 7 of the London Environment Strategy states, "London will be a zero-waste city. By 2026, no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled" ⁶.

Brexit's Impact on Waste in the City

Since the 2016 Brexit referendum, the incineration of London's local authority collected waste has doubled from 900,000 tonnes to 2 million tonnes, producing about 600,000 tonnes of carbon dioxide. This is primarily due to changes in waste disposal contracts that have led to more waste diversion to incineration instead of recycling. London's incineration, 54 per cent, now ranks highest across the U.K.

⁵ City of London. Circular Economy Statement Guidance.

⁶ London Environment Strategy (2018). Section 7: Waste. pg 277-327.

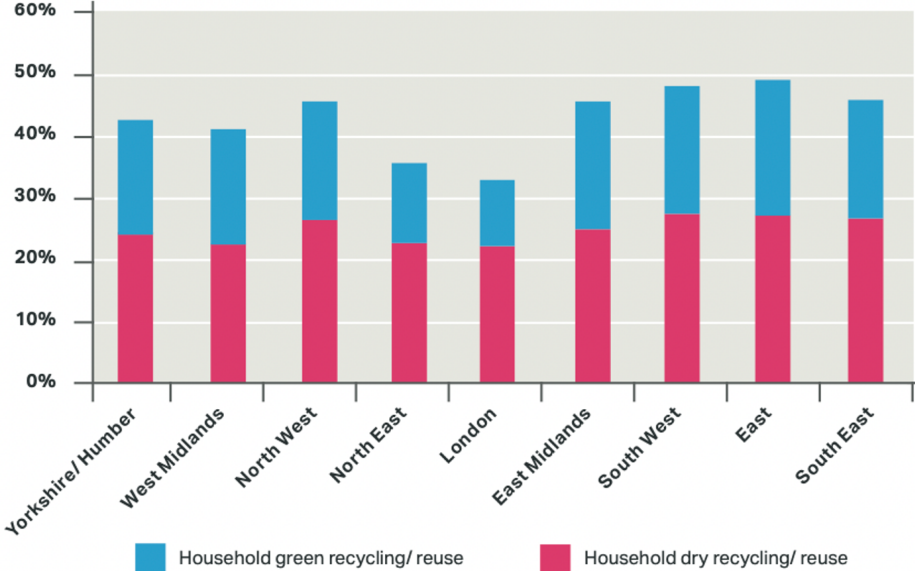
Another notable impact of Brexit on waste in the U.K., specifically in London, is the changes to the sale of recyclable waste to E.U. cities.

London gained over £400 million from sales to Dutch, German and Scandinavian energy-from-waste plants. Barriers to trade with the E.U. following Brexit have resulted in a decline in waste export and increased landfill use ⁷.

In light of this, the City has emphasised recycling its waste. The section below describes London's prioritisation of recycling.

City's Priorities

According to the Environment Strategy, the City has restructured the waste hierarchy to prioritise recycling as its primary approach to waste management. Currently, it ranks lowest in recycling rates in England (see figure 3 below), with 5 of the ten worst performing councils located in the City. Per the City, recycling its waste will aid in achieving its goals of adopting a circular economy approach to waste and resource management.



⁷ Carter. H (2021). *How does the new deal impact the recycling and waste management sector?*

Figure 3: Household Recycling across England

Source: London Environment Strategy, 2018.

Recycling Challenges

The environment strategy identifies the following challenges in achieving its recycling goals:

1. Fragmented Recycling Policies :

In London, recycling guidelines vary by location as its 33 boroughs provide different policies for its residents. Consequently, residents struggle to adhere to these policies, particularly those who relocate to different neighbourhoods. In 2020, the London Assembly Green Party published a report deeming household recycling in the city "impossible". Party member Caroline Russell shed light on the confusticating policies "It is too hard to know what to do with your rubbish in London. You can recycle bike tyres in Bexley but not Brent, and Hackney recycles foil, but Hammersmith does not". "When boroughs provide no clarity on what can be recycled, where, and in what condition, it is no wonder that London's waste mountain keeps growing" ⁸.

2. Language Barriers:

The strategy recognises that the ethnic diversity in the City intensifies barriers to communicating recycling guidelines. Currently, over 100 languages are spoken in London, complicating efforts to convey the recycling policies in various boroughs adequately.

3. Property Type:

In the City, over 50 per cent of its population resides in apartment buildings, and in specific neighbourhoods, the figure rises to as high as 80 per cent. Most of these structures fail to provide recycling services to their residents, whilst others lack sufficient storage space to house recycling infrastructure.

4. Business Polluters:

Currently, local boroughs have no requirements to provide businesses with recycling collection services and infrastructure. Additionally, these businesses generally lack the space to house recycling infrastructure. As a result, most businesses in the City fail to recycle their waste.

⁸ BBC (2020, January 18). Recycling household waste in London 'impossible'.

Proposed Solutions

The City identifies the following solutions as means to address its current challenges.

1. Waste Policy Consolidation:

The strategy recognises the need for overarching recycling guidelines for local boroughs. In the plan, Khan addresses that the fragmented recycling policies across the City are the primary reasons many residents fail to recycle their waste. Khan postulates that following a single mandate will increase recycling rates in the City.

2. Simplification of Recycling Guidelines:

The strategy notes that the City must establish simple recycling guidelines that its ethnically diverse population can easily understand. The strategy suggests:

- Six primary dry recycling materials are to be collected from all properties.
- Food waste should be collected separately.
- Single recycling collection provider per borough.

3. Borough by Borough Recycling Plans:

To develop the best overarching recycling guidelines for the City, the Mayor suggests that local boroughs should independently conduct comprehensive studies of the waste and recycling of their residents. Such a study will aid the City in setting realistic recycling targets.

4. Business Recycling Policies:

The strategy suggests developing recycling policies for businesses overseen by the Waste and Recycling Board (WARB).

1.4 Critiquing the Plan: How effective is London's Strategy?

The Waste Section of the Environment Strategy undoubtedly has significant strengths. The Mayor clearly identifies the need to invest in the Waste and Recycling Board (WARB) to increase the success implementation of the city's recycling policies. Additionally, there is emphasis placed on simplifying current recycling guidelines to improve participation, especially

in the lowest performing councils. Furthermore, Khan notes that providing local councils with the autonomy to conduct borough by borough waste profiles may assist in the development of more realistic and achievable recycling goals in the city.

While these strengths are commendable, the city's strategy is in dire need of significant revision. The following weaknesses have been identified.

Weaknesses:

1. Overestimation of Local Sales of Recyclable Waste:

As explained earlier in this essay, the City of London sold recyclable waste to German, Dutch, and Scandinavian waste-to-energy companies before Brexit. Following Britain's exit from the E.U., cross-country trades were severely limited by the new EU and non-EU trade restrictions. The City has sought local waste-to-energy companies to sell its recyclable waste. While the plan lists profits of £130 million, it fails to provide substantial proof of how this profit is calculated.

The U.K. only houses 54 waste-to-energy companies that primarily purchase waste from lower-income countries at significantly lower costs than the City sells. The overestimation of the profitability of the sales raises considerable concerns over the institutions this profit is expected to fund, such as the City's waste and recycling board (WARB).

The strategy suggests that funding from these sales will support the WARB in taking a more visible role in implementing waste reduction and recycling mandates in the City. However, a gross overestimation of the funding raises significant concern over how the City will adequately fund the WARB. The estimated profit to support the board is not guaranteed.

2. Lack of Space for Recycling Plants:

The strategy overlooks the lack of space in the City for developing recycling sites. While the plan highlights lack of space in the City as one of its recycling limitations, it suggests that its goal is to create more recycling centres and plants within the City without mentioning where these sites will be located.

3. Financing:

The plan notes that it will develop recycling infrastructure across the City but fails to acknowledge where financing for such construction will occur.

Overall Assessment:

The environment strategy is ambitious as it proposes complex solutions without consideration of their feasibility. The Mayor mentions significant development of recycling infrastructure and funding of the WARB but fails to mention how these feats will be financed. It raises serious concerns about how the City aims to implement its recycling goals.

1.5 Lesson Learned

While the City of London and Chicago differ considerably, I note the following lessons that Chicago may learn from London's challenges and its strategy.

1. Waste Management Board:

Similar to London, the City of Chicago may benefit from establishing a waste management board to conduct a comprehensive analysis of waste generation patterns across each neighbourhood in the City. While Chicago has its independent recycling program overseen by the Chief Sustainability Officer, a city-run commission focused on aiding the city in its transition to a circular economy may support the development of realistic waste management goals to aid this shift. However, the city already operates on a severe budget deficit, funding a waste and recycling board might be impractical.

2. Community-level Waste Management Policies Implementation:

Community-level action may support the successful implementation of the city's waste management policies. As explained in the London Environment Strategy, environmental policies often fail due to poor considerations of the execution plan. Designating local aldermen and authorities to support the implementation of citywide mandates may accomplish better implementation results.

3. Recycling in Apartments:

The London Environment Strategy notes that apartment buildings generally lack the space to house recycling facilities and infrastructure. The number of apartment buildings in Chicago is comparable to the City of London. Therefore, improving recycling performance in buildings recognised as principal polluters may benefit the city.

While Chicago passed its first recycling ordinance for high-density buildings in 1995, the city has failed to implement this law successfully. An investigation by the Better Government Association in 2018 (BGA) reveals that the city's residential high-density building recycling rate of 9 per cent, ranks among the worst in the U.S. big cities ⁹.

Adopting a similar building type prioritisation approach as London, may benefit Chicago in improving its residential recycling rates in high-density properties such as apartment buildings.

1.6 Concluding Thoughts

The U.K.'s exit from the E.U. has meant that London must now develop a feasible and executable waste management plan. Brexit detrimentally affected London's approach to waste management, with recycling rates and waste incineration surging following the 2016 referendum. The development of the City's first environment strategy notes that the local authorities are aware of the negative impacts of Brexit on managing a clean and sustainable city. While the City succeeds in denoting ambitious approaches to addressing the impact of waste on the environment quality, it fails to evaluate how it will successfully implement these solutions adequately. The case of the London Environment Strategy highlights a crucial aspect of environmental planning that is often neglected in city plans globally— a comprehensive solutions feasibility study. The failure to analyse the probability of success of proposed solutions has severely hampered the effective adoption of local and national environmental plans.

⁹ Chase (2020). *City does nothing to punish recycling law-breakers, watchdog finds*. Chicago Sun Times.

This is most evident when looking at the City of London today, where the plan's goals for recycling and waste management have failed to curb the waste challenges in the City. Waste incineration rates have consistently increased since 2016, with recycling rates decreasing rapidly. While other factors such as population growth in the City may contribute to the current statistics, it is still evident that the London Environment Strategy, specifically in waste management, has failed to accomplish its goals.

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