

## **Response to the Defra consultation on the future funding of WRAP in England**

Marks & Spencer and our suppliers have worked closely with WRAP across a wide range of environmental impacts for over a decade. When launched, WRAP replaced a 'patchwork' of issue based organisations including Wastewatch, Going for Green and ENCAMS with a remit to drive environmental behaviour and performance 'beyond legislation'.

Over that time we have found WRAP to be an effective partner and arbiter and we welcome the continued consolidation of environmental bodies such as NISP under WRAPs management. We would note that a diminishing of WRAP's function would likely result in a return to the previously less effective 'patchwork' of organisations .

### **Q1. Where are the most important market failures? Where is there still a need for government to fund activities to support waste reduction and resource efficiency policy in England?**

- Co-ordination across all four national Government programmes.
- Co-ordination across EU and International product footprinting programmes
- Development and sharing of 'know how' across different sectors.
- Identification and quantification of actions which can reduce environmental impacts.
- Independent and authoritative quantification of performance.
- Competition law limiting co-operation amongst competitors.

### **Q2. Where are there business barriers to the take-up of cost-effective resource efficiency measures? Where is it possible to move to a private sector-funded approach?**

- Limitations of co-ordination across competing companies and sectors
- Access to knowledge and ability to quantify benefits
- Funding

### **Q3. What is the best way to deliver these activities on Defra's behalf? Which organisations are best placed to deliver (e.g. businesses, local authorities, civil society organisations)? And how can we ensure best value for public money?**

As far as possible, a 'one –stop-shop' approach allowing for easy to access, consistent support is preferable.

### **Q4. Which of WRAP's current activities in England do you value most?**

1. Product Sustainability Forum ( shared learning preparing industry for the future)
2. Sustainable Clothing Action Programme (developing solutions and providing scale).
3. Courtauld Commitment/ LFHW ( collaboration and quantification)
4. Construction Waste (collaboration and quantification)

### **Q5. Which of WRAP's current activities in England do you think should be regarded as lower priority for Defra funding in future?**

M&S has had little involvement with some WRAP initiatives such as the Environmental Transformation Fund and the development of PAS standards- though we appreciate those other stakeholders may value these more highly.

**Q6. What role should Defra fund WRAP to play in the EU or internationally?**

We believe that WRAP provides three important levels of co-ordination; across UK national governments, EU and internationally. We believe that all will remain important.

**Q7. What appetite is there on the part of those who benefit from WRAP's advice and support to make a financial contribution in return?**

We would be prepared to make a modest' membership 'payment. However this may deter the very organisations WRAP would want to engage and would to some degree change the nature of relationships.

**Q8. If Defra were to reduce its funding for WRAP could this have any indirect effects?**

- Loss of consistent engagement with consumers on environmental issues.
- Defra (Decc, Dfid and others) initiatives would likely to run into competition law barriers.
- Across the UK, 'dropped' activities are likely to be adopted by smaller regional bodies moving back towards the less efficient 'model' abandoned in 2000.
- The UK would have a less authoritative position and therefore less influence on EU and international developments in this area.

Yours faithfully

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