

27th September 2010

Evidence for the Review of Waste Policies

Marks & Spencer is one of the UK's leading retailers with over 21 million customers visiting our 690 stores every week. We sell high quality, great value clothing, home products and food.

In 2007, we launched Plan A which included 18 commitments on improving waste and recycling. In March 2007, we added a further 10 commitments,

Under Plan A, we are committed to achieving zero waste in our own operations, reducing food waste and packaging by 25%, carrier bag usage by 33% and helping our customers to recycle used M&S products.

We have made good progress to date in working with partners including WRAP on packaging and food waste, Oxfam on clothes recycling and RecycleBank and Somerset Waste Partnership on domestic recycling services.

Our response below is largely based on our experiences since we launched Plan A:

We support Government's proposal for a zero waste economy. Initially through diversion from landfill but also supported by improvements in resource efficiency.

Government should prioritise the most significant and high carbon value waste. Accounting for over 90% of all UK waste, government should prioritise volumes generated by agriculture, industry, construction and commerce. This waste is relatively easily diverted from landfill if alternative facilities are available at a competitive cost. WRAP's work to halve construction waste to landfill by 2012 and piloting of Anaerobic Digestion facilities are good examples.

Food should become Government's priority in reducing domestic waste. Overall waste from households accounts for only 9% of total UK waste although food is the largest / high carbon value element.

Food waste accounts for around 8 million tonnes and has a high embedded carbon value. We have supported WRAP's 'Love Food, Hate Waste' campaign to raise awareness and offer solutions. We also believe that the provision of domestic food waste collections helps in raising awareness. However, like healthier eating, reducing food waste is largely dependent on consumer knowledge and skills and will require longer term education and commitment.

Packaging accounts for only 6 million tonnes of domestic waste but is highly visible and totemic. Packaging is currently subject to a disproportionate focus of legislation and resource. Under WRAP's Courtauld Commitment significant improvements have been achieved and overall packaging recycling rates are approaching 70%. For M&S customers, whether an item of packaging is 'recyclable' is the

most important issue in accessing the environmental qualities of packaging and we believe that improving the consistency and availability of recycling for non-bottle plastic packaging is critical if further progress is to be made. We support a review of existing regulation, specifically the Packaging Recovery Note (PRN) mechanism to ensure transparency and allow local government to receive funding directly for the provision of recycling services. Our current work with the Somerset Waste Partnership is exploring how this might work practically. See link for more details:

http://corporate.marksandspencer.com/media/press_releases/planA/LocalAuthorityRecyclingPartnerships

Clothing accounts for around 2 million tonnes and our work with DEFRA's Sustainable Clothing Action Plan has shown that re-use and recycling have improved to 30%. Further re-use opportunities exist and we believe that this is an area where industry, Government and the 'third sector' can work in partnership. We believe that encouraging collaboration on clothes re-use/ recycling should become the focus of the DEFRA Sustainable Clothing action Plan as a UK based impact that UK organisations can directly influence.

We support the use of an appropriate mix of legislative, economic and voluntary measures. This should include further restrictions on materials which can be sent to landfill (such as food and aluminium, plastic and glass packaging) as well as a continued landfill tax escalator. These measures will provide economic incentives to encourage the development of improved collections, recycling and processing. We also support the work of WRAP's Courtauld Commitment on voluntary measures which are in addition legislation.

We believe that the Government policy should encourage innovation but set clear minimum standards for materials to be collected. We agree that it is important to encourage diversity and innovation across the waste sector. This will allow the development of alternative technologies for processing waste as well as different approaches to collection such as the RecycleBank incentive scheme. However, this innovation must be directed to provide a common minimum standard of service, quality and the types of material collected across the UK.

We support the development of a holistic approach to waste. This must include exploiting the opportunities to improve resource efficiency and generate energy using processes such as Anaerobic Digestion. For example, the use of DEFRA/ DECC's reporting guidelines to calculate 'waste to carbon' can help companies measure and improve their overall resource efficiency. These guidelines (on waste) were first published in 2009 but have so far received little publicity and promotion.

Should you wish to clarify any of our responses or just seek further information please do not hesitate to contact me.

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