

Policy Landscape Review: A report for CIWM

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Executive Summary

This report revisits CIWM's 2024 Review of the Resources & Waste Strategy for England as we approach the first anniversary of the election of the new Government. It identifies the most significant opportunities for CIWM and the sector, given the Government's emerging domestic policy agenda. The report is structured in 4 parts:

Part 1 summarises the new Government's domestic policy agenda, including its five Missions and seven emerging policy proposals of high relevance to our sector:

- a Circular Economy Strategy for England, being developed by a CE Taskforce;
- a Net Zero Strategy, being developed by a Net Zero Council;
- an Industrial Strategy, supported by an Industrial Strategy Advisory Council;
- a Critical Minerals Strategy;
- the creation of Skills England, a new arm's-length body;
- Dan Corry's review of Defra's Regulatory Landscape; and
- a consultation paper from HM Treasury on reform of the landfill tax.

Part 2 maps the ten opportunities identified in CIWM's 2024 R&W Strategy Review against the current and emerging policy landscape, and finds that:

- 1 opportunity has been implemented;
- 4 opportunities have been partially implemented; but
- 5 opportunities have not been addressed to date.

Part 3 summarises the CE/R&W sector's needs and priorities, highlighting:

- CIWM's own priorities and recent key reports;
- Recent documents from stakeholders such as the CBI, ESA, Suez, Green Alliance, the Aldersgate Group and Circle Economy; and
- Some wider contextual issues.

Part 4 presents a brief gap analysis and highlights ten recommendations. In summary, the recommendations are as follows:

- The Circular Economy should be central to the Government's thinking, since it drives economic growth and jobs, cuts carbon emissions, and so directly supports the Government's first and second Missions;
- Cross-Government policy integration will be vital;
- It is not too late to influence Skills England to ensure incentivisation of skills initiatives in our sector;
- Resource resilience should remain a focus area for CIWM;
- EPR for new waste streams, including WEEE, batteries, textiles and mattresses, should remain a priority, once the principle has been successfully proven;
- Reuse needs policy support to encourage take-up and scaling;
- The publication of Dan Corry's review of Defra's Regulatory Landscape provides an influencing opportunity for CIWM;
- The increased cost of EfW, arising from bringing it into the UK ETS in 2028, should be reflected in pEPR fees;
- The Resources & Waste Strategy 2018 reforms still need to be fully implemented. This does not just apply to pEPR, Simpler Recycling and DRS, but also to stalled reforms of the Waste Carrier, Broker and Dealer registration system and Digital Waste Tracking; and
- Tackling waste crime needs more focus and additional resources.

Table of Contents

Executive Summary	1
Table of Contents	2
Introduction	3
Part 1: A summary of the new Government's policy agenda	4
1.1 The Government's Manifesto and Five Missions	4
1.2 Government policies in development	5
Part 2: Mapping CIWM's Review of the Resources & Waste Strategy against the current and emerging policy landscape	12
2.1 Which of CIWM's ten opportunities have been implemented?	13
2.2 Which of CIWM's ten opportunities are in the process of being implemented?	14
2.3 Which of CIWM's ten opportunities have not yet been addressed?	15
Part 3: Sector priorities	16
3.1 CIWM's priorities for the sector	16
3.2 Other stakeholder perspectives	18
3.3 Wider contextual issues	21
Part 4: Gap analysis and recommendations	23
4.1 Gap analysis	23
4.2 Recommendations	24

Introduction

1. In 2024, CIWM undertook a review of the Resources and Waste Strategy for England 2018, utilising a small 'Task and Finish' group of CIWM members. The outcome of the review was a list of ten 'policy asks', published during the General Election campaign¹, and a more detailed report, published after the election in August 2024².
2. Now that the new Government has been in post for almost a year, CIWM has commissioned this new report to provide a rapid review of the current and emerging domestic policy landscape against the previous report, in order to identify the most significant opportunities and policy gaps relevant to CIWM and the wider circular economy (CE) and resources & waste (R&W) sectors.
3. It should be noted that this report focuses primarily on the UK Government's domestic policy agenda, covering England (for devolved policy issues) or the entire UK. It does not cover relevant European and international policy initiatives (including further negotiations this August in Geneva on the proposed UN Global Plastics Treaty³, and proposals for an EU Circular Economy Act⁴, expected in 2026). I would recommend that CIWM undertake further work on the international policy agenda in future, to identify opportunities for global UK leadership (e.g. demonstrating greater resource resilience through onshoring, or addressing the perception that waste from developed countries continues to be 'dumped' on developing countries.)
4. This review has been undertaken through desk research, focused on documents available in the public domain and published by the UK Government, the devolved Administrations, CIWM and relevant stakeholder organisations.
5. The remainder of this report is structured as follows:
 - a. Part 1 summarises the new Government's policy agenda, including their five Missions, and several key strategies and policies that are currently under development.

¹ See www.ciwm.co.uk/policyasks .

² See www.circularonline.co.uk/wp-content/uploads/2024/08/CIWM-375-RWS-Report-C.pdf .

³ See www.unep.org/inc-plastic-pollution/session-5.2 .

⁴ See https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en .

- b. Part 2 analyses the recommendations of CIWM's 2024 R&W Strategy Review against the current and emerging policy landscape, identifying those points that have already been implemented, those that are in the process of being implemented, and those that have not been adopted to date.
- c. Part 3 summarises the CE/R&W sector's needs and priorities, as set out in reports from CIWM and other relevant stakeholders.
- d. Part 4 presents a gap analysis and ten recommendations.

Part 1: A summary of the new Government's policy agenda

- 6. Since the General Election in July 2024, the new Labour Government has introduced a large number of policy and strategy proposals, intended to implement their election manifesto. Many of these are at an early stage of development. In this first part of the report, we review the most relevant ones.
- 7. The existing policy landscape, which the current Government inherited from the previous Conservative administration, will be considered alongside these emerging policies in Part 2 of the report, where both current and emerging policies will be mapped against CIWM's ten policy asks from 2024.

1.1 The Government's Manifesto and Five Missions

- 8. The Labour Party set out their intended approach to government in their General Election manifesto in June 2024⁵. Their main priorities are structured under five 'Missions'. These are summarised below, with a note highlighting the relevance of CIWM's agenda to each one:
 - a. Kickstart economic growth, create jobs and increase productivity.
 - i. Moving to a circular economy (CE) can drive economic growth and create jobs, as discussed in Part 3 of this report.
 - b. Make Britain a clean energy superpower, and accelerate to net zero.
 - i. Moving to a Circular Economy reduces carbon emissions, so it supports this Mission.
 - ii. However, it is vital that our sector is involved at an early stage, to ensure that circular design principles are incorporated into the Clean Energy Mission from the start, to minimise overall resource use and minimise end-of-waste challenges with e.g. electric vehicle batteries, solar panels and wind turbine blades.
 - c. Break down barriers to opportunity, including reform of childcare and education.

⁵ See <https://labour.org.uk/change/>.

- i. One of the four delivery areas for this Mission is to 'Build skills for opportunity and growth'. The skills required in a circular economy will need to be included here.
 - d. Safer streets, including cutting crime.
 - i. Waste crime causes serious environmental, economic and social harm. CIWM should push for this Mission to include and address environmental crime, in order to eradicate it.
 - e. Build an NHS fit for the future.
 - i. This Mission has limited direct relevance to the sector's core agenda – although Health & Safety remains a high priority issue for the entire R&W sector.
9. The Labour manifesto explains that the five Missions are to be underpinned by three 'Strong Foundations', comprising economic stability, secure borders and national security. Of these, the CE agenda is most relevant to national security, in terms of the ability of a CE to improve resource resilience in the supply chain, including for critical minerals.
10. The manifesto also stated that the Labour Party 'is committed to reducing waste by moving to a circular economy'. And since taking office, the Environment Secretary Steve Reed MP has stated that he has 'made creating a Circular Economy one of my five core priorities' for Defra.

1.2 Government policies in development

11. I highlight here seven key policy proposals of direct relevance to our sector that the Government is currently developing:
- a. A Circular Economy Strategy for England, backed up by five sector-specific roadmaps. This is being developed by a CE Taskforce;
 - b. A Net Zero Strategy, being developed by a Net Zero Council;
 - c. An Industrial Strategy, supported by an Industrial Strategy Advisory Council;
 - d. A Critical Minerals Strategy;
 - e. The creation of Skills England, a new arm's-length body;
 - f. Dan Corry's review of Defra's Regulatory Landscape; and
 - g. A consultation paper from HM Treasury on reform of the landfill tax.

Circular Economy Strategy for England

12. The Government established a 'Circular Economy Taskforce' in November 2024⁶. The Taskforce is an independent expert advisory group whose purpose is to co-design with the government a Circular Economy Strategy for England.
13. The Government intends the CE Strategy to help deliver five key objectives:
- drive economic growth by stimulating investment in technologies, sectors and infrastructure that enable resource circularity;
 - create jobs across the circular economy and bolster the security of supply chains;
 - increase resource efficiency and productivity;
 - reduce emissions and accelerate to net zero; and
 - contribute to the Government's Missions to kickstart economic growth and make Britain a clean energy superpower; in particular, by supporting delivery of the UK Government's Industrial Strategy and the refreshed Carbon Budget Delivery Plan.
14. To achieve this, the Taskforce will:
- identify a set of metrics with which the UK government can measure England's progress towards a CE, and propose local and national targets;
 - detail the policy pathway that will deliver those targets as efficiently as possible, delivering both economic growth and environmental benefits; and
 - set out the priority interventions and sectors in which those interventions must be made, developing a series of sector-specific roadmaps to capture the policy pathway in detail.
15. The roadmaps will cover five sectors, which have been chosen as those with the greatest potential to grow the economy, protect the environment, provide new income for businesses, generate skilled jobs, and ensure resilience against global supply chain shocks. They are:
- Chemicals and plastics;
 - Built environment;
 - Textiles;
 - Transport (including Electric Vehicle batteries); and
 - Agrifood.
16. The CE Taskforce has 19 members from across the sector, including CIWM's Senior Vice-President, Dr David Greenfield. It is chaired by Andrew Morlet (former CEO of the Ellen MacArthur Foundation). The Deputy Chair is Professor Paul Ekins from UCL. The Taskforce is supported by a secretariat based in Defra, and it reports to the Circular Economy Small Ministerial Group, which includes

⁶ More information, including the Taskforce's Terms of Reference, can be found at www.gov.uk/government/groups/circular-economy-taskforce.

Ministers from six departments (Defra, DBT, DESNZ, DfT, HMT, MHCLG).

17. It is intended that the Taskforce will complete its work within a year. The work programme is structured into two phases:
- Phase 1 (Oct 2024 to Jan 2025) – agree on definitions, metrics, targets, and any early recommendations that might require new funding from the Spending Review;
 - Phase 2 (Jan to Oct 2025) – develop a CE Strategy for England that maps out the interventions required to deliver a circular transition in England over the next decade and beyond. Phase 2 will conclude with publication of the Strategy and associated roadmaps in Q3 of 2025.
18. At the time of writing (May 2025), the CE Taskforce is engaged in an extensive programme of stakeholder engagement. CIWM will clearly want to be as involved as possible in this process.
19. It is important to note that, since resources & waste policy is a devolved matter, Defra's CE Strategy will cover England only. Defra have, however, indicated that they 'are exploring opportunities to align with the devolved governments' (CE Taskforce email update, 7 May 2025). In coming to a view on the policy landscape across the entire UK, it is important to recognise the excellent work that is being done in the other three Nations, including:
- 'Scotland's Circular Economy and Waste Route Map to 2030' (Scottish Government, December 2024)⁷;
 - 'Beyond Recycling: A strategy to make the circular economy in Wales a reality' (Welsh Government, March 2021)⁸;
 - 'Circular Economy Strategy for Northern Ireland' (draft, January 2023)⁹.

Net Zero Strategy and Council

20. The UK has set legally binding targets to reach 'Net Zero' greenhouse gas (GHG) emissions by 2050¹⁰. These include interim targets: a 68% reduction in GHG emissions by 2030, and an 81% reduction by 2035 (from 1990 levels).

⁷ See www.gov.scot/publications/scotlands-circular-economy-waste-route-map-2030/.

⁸ See www.gov.wales/beyond-recycling.

⁹ See www.economy-ni.gov.uk/articles/circular-economy.

¹⁰ 'Net Zero' means that emissions will need to be minimised as much as possible, with any remaining emissions being balanced by an equal level of GHG removal from the atmosphere

21. In order to help deliver these targets, the Government re-launched the 'Net Zero Council' (a previous version of which existed between 2023 and early 2024 under the last Administration) in December 2024¹¹.

22. The Council has three broad functions:

- a. providing expert insight – advising government in the development of its Net Zero Strategy;
- b. driving action towards decarbonisation across the economy – convening senior leaders across the highest emitting sectors of the economy to tackle cross-cutting barriers to decarbonisation, supporting businesses to take action and enabling them to realise the benefits of the transition; and
- c. outreach and communications to the wider business community – members will engage across their networks, advocate for action and promote climate leadership.

23. The Net Zero Council has 24 members from central and local government, civil society and the private sector, including the UK CEO of Suez, John Scanlon. It is co-chaired by Ed Miliband MP (Secretary of State, DESNZ) and Shirine Khoury-Haq (CEO, the Co-operative Group).

24. At its first meeting, on 5 Feb 2025, the Council's priorities for 2025 to 2026 were agreed. They are:

- a. providing expert input to inform government strategies relating to net zero;
- b. supporting the development and delivery of sector roadmaps, to help businesses develop transition plans and investors identify opportunities;
- c. supporting small and medium-sized enterprises (SMEs) to decarbonise while maximising the benefits of the transition; and
- d. informing the government's approach to public engagement and supporting public participation in the net zero transition.

25. At the 5 February meeting, the Council reviewed and welcomed the 'Net Zero Transition Plan for the UK Food System', developed by the Institute for Grocery Distribution, the consultancy EY, and WRAP¹². This could, perhaps, form the starting point for the agri-food roadmap that the Circular Economy Taskforce are planning to develop.

¹¹ See www.gov.uk/government/groups/net-zero-council for further details.

¹² Details can be found at www.igd.com/Social-Impact/Sustainability/Reports/Net-Zero-Transition-Plan-for-the-UK-Food-System/53058.

26. A roadmap for the resources & waste sector has been identified as an early priority and is due to be developed in the second half of 2025. This workstream will be project managed by WRAP¹³ and should be an opportunity for direct CIWM support and influence. It should build on existing work, including the current Net Zero Sector Strategy developed by ESA and supported by CIWM.

27. It is not currently clear to what extent the thinking of the Net Zero Council is informed by circular economy principles. In my view, CIWM should work with sector colleagues and others to ensure that the Net Zero Council understands the full potential of a circular economy approach for cutting carbon emissions across the entire economy, not just in the resources & waste sector.

Industrial Strategy

28. In October 2024, the Government published for consultation a Green Paper (called 'Invest 2035')¹⁴, setting out its vision for a new Industrial Strategy for the UK. This is intended to be a 10-year plan which will implement targeted policy interventions to drive growth where the UK has, or could develop, a comparative advantage, or to unlock barriers essential for delivering long-term, sustainable, inclusive, and resilient growth (in line with the Government's first Mission). The consultation received over 3,000 responses. The final version of the Industrial Strategy is due to be published alongside the Spending Review on 11 June 2025.

29. The Government set up an Industrial Strategy Advisory Council (ISAC) in December 2024. It is an independent, non-statutory, expert committee, sponsored by the Department for Business & Trade (DBT) and HM Treasury, which is responsible for advising the Government on the development and delivery of the forthcoming Industrial Strategy, and monitoring progress on its objectives. ISAC is chaired by Clare Barclay (President, Enterprise and Industry, EMEA Region, Microsoft), and has a total of 16 members, drawn from business, academia and trade unions. None of the current members has a close link to our sector.

¹³ Personal communication.

¹⁴ See www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy.

30. The Industrial Strategy will focus on the eight sectors of the economy which are believed to offer the highest growth opportunities:
- a. advanced manufacturing;
 - b. clean energy industries;
 - c. creative industries;
 - d. defence;
 - e. digital and technologies;
 - f. financial services;
 - g. life sciences; and
 - h. professional and business services.
31. The intention is to develop sector (and sub-sector) plans for each, in partnership with business, devolved governments, regions, experts, and other stakeholders.
32. There is a single reference to the circular economy in the Green Paper, while discussing Net Zero as one of the Strategy's objectives. It states that the Industrial Strategy 'will build a strong domestic industrial base across services and manufacturing to gain strategic economic advantage – creating good, well-paid jobs in the green sectors of today and of the future. This includes opportunities presented by the circular economy.' (Emphasis added.)
33. While this reference is helpful, it appears to present the circular economy solely as a potential beneficiary of the Strategy's outputs. In my view, CIWM should instead emphasize the importance of incorporating circular economy principles into the Industrial Strategy's design from the beginning.

Critical Minerals Strategy

34. In December 2024, DBT Minister Sarah Jones MP announced that the Government would be publishing a Critical Minerals Strategy in 2025. She expanded on this in a written answer to a Parliamentary Question from Bobby Dean MP on 1 April 2025, when she said¹⁵, 'A secure supply of critical minerals is vital for the UK's economic growth and security, industrial strategy, and clean energy transition. The Government will work hand in hand with industry to publish a new Critical Minerals Strategy this year. The Critical Minerals Strategy will help secure our supply chains for the long term and drive forward the green industries of the future.'

¹⁵ See <https://questions-statements.parliament.uk/written-questions/detail/2025-03-24/40887>.

35. As part of the preparatory work on the Critical Minerals Strategy, in April 2025 DBT published a research report that they had commissioned from the Frazer-Nash consultancy, titled 'UK Critical Minerals Recycling and Midstream Processing Capability Assessment'. This includes an assessment of the UK's capability for 'recycling of end-of-life products and technologies and recovery and re-use of critical minerals from non-traditional sources, such as mining and manufacturing waste.'¹⁶
36. CIWM should offer to support the development of this Strategy (if not already involved), to ensure that the opportunities that a circular approach could bring to increasing the resource resilience of the UK's use of critical minerals is not overlooked.

Skills England

37. The Government announced the establishment of a new arm's-length body, 'Skills England', on 22 July 2024, launching it initially in shadow form as a unit within the Department for Education (DfE). Once legally established as a separate organisation, it will report to DfE.
38. The stated rationale behind the new body is that skills are crucial to economic growth, with one-third of productivity improvements over the last two decades being explained by improvements to skills levels. However, between 2017 and 2022 UK skills shortages doubled to more than half a million, accounting now for 36% of job vacancies.
39. Skills England is intended to bring together central and local government, businesses, training providers and unions to meet the skills needs of the next decade across all the regions of England, providing strategic oversight of the post-16 skills system and aligning it to the government's Industrial Strategy.
40. Their first report ('Skills England: Driving growth and widening opportunities', September 2024) states (on p.11) that they 'will work closely with the Industrial

¹⁶ See www.gov.uk/government/publications/uk-critical-minerals-midstream-and-recycling-capability-report.

Strategy [Advisory] Council so that we have the skilled workforce needed to deliver a clear, long-term plan for the future economy'¹⁷.

41. Later in the same report, they identify 'the move towards a green economy' as one of three 'future megatrends' that will impact upon the UK's future jobs and skills requirements (ibid, p.38). However, they go on to say (boxed text, pp.42-43) that in response, 'the Department for Energy Security and Net Zero (DESNZ) has set up The Office for Clean Energy Jobs, which will focus on ensuring we have the skilled workforce in core energy and net zero sectors, critical to meeting the government's Clean Energy Mission: to make the UK a clean energy superpower.'
42. It appears from this that the early evidence being provided to Skills England on the jobs and skills required for the move towards a green economy may be somewhat skewed towards only that part of the green economy which falls under the policy portfolio of DESNZ. Thankfully, Skills England is continuing to engage with stakeholders.
43. As CIWM stated on 27 March 2025, in its response to Environment Secretary Steve Reed MP's speech about the proposed Circular Economy Strategy, 'Our sector will be part of the bedrock of a more circular economy'¹⁸. While our expectations are high, there are some areas, such as the skills agenda, which currently appear to be sandy and shifting.
44. It will be important for CIWM and the wider sector to engage with Skills England (either directly, or through the Industrial Strategy Advisory Council) as a priority, to ensure that the future jobs and skills requirements of moving to a circular economy are fully reflected in their forward thinking about 'the move towards a green economy'.

Dan Corry's review of Defra's Regulatory Landscape

45. Dan Corry (an economist, and the former Head of the Number 10 Policy Unit under PM Gordon Brown) was commissioned by the Environment Secretary, Steve Reed

¹⁷ See www.gov.uk/government/publications/skills-england-report-driving-growth-and-widening-opportunities

¹⁸

www.ciwm.co.uk/ciwm/news/2025/ciwm_responds_to_uk_government_circular_economy_ro_admap.aspx.

MP, in October 2024, to undertake a review of Defra's regulatory role. The purpose of his review was 'to examine whether Defra's regulatory landscape is fit for purpose and to develop recommendations for ensuring that Defra's regulators and regulations are driving economic growth while protecting the environment', as well as to consider 'the customer and stakeholder experience and the efficiency of regulation.' The final report, titled 'Delivering economic growth and nature recovery: An independent review of Defra's regulatory landscape', was published on 2 April 2025¹⁹.

46. The report contains 5 strategic themes and 29 recommendations, and makes several points of direct relevance to CIWM and the R&W sector, including:
- a. Recommendation 10 (p.30) proposes regulatory 'sandbox experiments'. These could be useful for areas where waste regulation is no longer seen as fit for purpose, to explore whether innovative alternative solutions might work (e.g. regulating reuse, as discussed in the Reuse Network's February 2025 'Reuse Roadmap'²⁰);
 - b. Recommendation 13 (p.8) on reviewing the Environmental Permitting (England & Wales) Regulations 2016. A partial review, covering the permitting of exemptions, was launched on 8 April, but the recommendation is broader than this, and appears to contain sensible proposals for reform;
 - c. Recommendations 15 to 18 (p.9) on greater self-regulation, compliance monitoring and streamlined enforcement, including in the waste sector.
47. There is an important passage in the report's conclusion (p.60): '... we must be aware that resources going into these regulators have been significantly reduced since 2010 even as their responsibilities have continued to increase. Ministers and the government will want to think about this. In addition, investment into making our environmental regulators fully embrace the opportunity of technological and digital approaches will need upfront investment in tech and skills. Defra and the government will need to think about how to fund this.'
48. In my view, CIWM should echo these concluding points, as the sector needs effective regulators that are properly resourced. More generally, the publication of the Corry review, and the positive response it received from Ministers, provides an excellent opportunity for CIWM to engage with Defra on our proposals for regulatory reform, as set out in the 2024 RWS Review and in Dr Anna Willetts'

¹⁹ See www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape .

²⁰ See <https://reuse-network.org.uk/wp-content/uploads/2025/02/The-Reuse-Roadmap.pdf> .

2022 Presidential Report, 'Improving the way we regulate circular resources in the UK'.

Consultation on reform of the landfill tax

49. On 28 April 2025, HM Treasury published a paper titled 'Consultation on Reform of Landfill Tax in England and Northern Ireland'²¹. The consultation is open until 21 July. In it, the Government proposes to reform and simplify landfill tax by:
- a. transitioning to a single tax rate by 2030;
 - b. removing various exemptions; and
 - c. increasing the rate applied to disposals at unauthorised sites.

50. The consultation follows on from a call for evidence in November 2021 and the Government's response to that, published in March 2023.

51. CIWM will obviously wish to respond to the detail of this consultation in the usual way. However, this consultation exercise may also provide a useful opportunity for CIWM to engage with HM Treasury Ministers and officials on the broader issue of introducing economic incentives to drive the UK towards a circular economy, as discussed later in this report.

Part 2: Mapping CIWM's Review of the Resources & Waste Strategy against the current and emerging policy landscape

52. This section of the report will compare the conclusions of CIWM's August 2024 'Review of the Resources & Waste Strategy' against the current and emerging policy landscape, to establish which of CIWM's ten 'opportunities' have already been implemented, which are in the process of being implemented, and which have not been adopted to date.

53. In coming to the judgements below, it has been helpful to be able to refer to a roadmap of the many policy and legislative changes that have already been announced for implementation in the coming months and years. CIWM's Roadmap, which is based on publicly available sources of information, is set out in Figure 1.

²¹ See www.gov.uk/government/consultations/consultation-on-reform-of-landfill-tax.



Figure 1: CIWM roadmap of forthcoming policy and legislative changes

54. In our view, one of CIWM's ten policy opportunities has been implemented to date. A further four are in the process of being implemented. The remaining five have not been adopted so far.

2.1 Which of CIWM's ten opportunities have been implemented?

55. Regrettably, only one of CIWM's ten policy opportunities has been fully implemented to date.

56. CIWM called for the creation of a cross-government resource resilience taskforce. To a significant extent, this call has been delivered through the creation of the Circular Economy Taskforce, which is a cross-government taskforce which includes circular economy and net zero in its remit, coupled to the fact that



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resource resilience links directly to the Government's Five Missions, as discussed above.

2.2 Which of CIWM's ten opportunities are in the process of being implemented?

57. Four of CIWM's ten policy opportunities are in the process of being implemented:

- a. We called for a Resource Resilience Strategy, to incorporate the key policies in the 2018 Resources & Waste Strategy, alongside new levers to drive the adoption of a Circular Economy and help us deliver Net Zero.
 - i. All three points appear to be in the process of being implemented through the current implementation of the main policies in the 2018 Strategy, the proposed CE Strategy, and the proposed Net Zero Strategy. For clarity, CIWM may wish to suggest that resource resilience is explicitly added to the objectives of the forthcoming CE Strategy.
- b. Implement the existing Resources & Waste Strategy policies.
 - i. As highlighted above, and illustrated in detail in Figure 1, many of the main policies in the 2018 Strategy are in the process of implementation. However, although EPR, DRS and Better Recycling are well advanced towards implementation, many practical challenges remain. At the same time, there are other important policies – including long overdue reforms to the Waste Carrier, Broker and Dealer registration system, the delayed introduction of Digital Waste Tracking, and changes to the producer responsibility regimes for Waste Electrical and Electronic Equipment (WEEE) and Batteries – that have yet to be implemented.
- c. Regulating for the new reality.
 - i. CIWM called for better funding and resources for our regulators, along with a modernised approach to the role of regulation. Those points have been echoed in Dan Corry's April 2025 review of Defra's regulatory landscape²², discussed in section 1.2 above, and all of whose recommendations the Government is 'actively considering'²³. CIWM should call on Defra to implement these as a matter of urgency.
- d. Introduce targeted economic instruments.

²² 'Delivering economic growth and nature recovery: An independent review of Defra's regulatory landscape', Dan Corry, 2 April 2025. See www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape.

²³ See www.gov.uk/government/news/major-reforms-to-environmental-regulation-to-boost-growth-and-protect-nature.

- i. A number of economic instruments have been introduced over recent years, including pEPR, the Plastic Packaging Tax and DRS. In addition, the Government is proposing to add EfW into the UK Emissions Trading System, and to make changes to the landfill tax to improve environmental outcomes. Nonetheless, more could be done to use economic instruments to drive circularity and CIWM should encourage the CE Taskforce (and HM Treasury) to think creatively in this area, utilising the recommendations set out in CIWM's December 2024 report, 'Shaping future financial and fiscal policies for a more circular economy in the UK'²⁴. The current consultation on reform of the landfill tax, discussed in section 1.2 above, may provide an early opportunity to initiate this discussion.

2.3 Which of CIWM's ten opportunities have not yet been addressed?

58. Unfortunately, five out of CIWM's ten policy opportunities have not been addressed to date. They are:

- a. Focus on Green Skills.
 - i. Although Skills England does have a focus on *some* green skills, as set out in section 1.2 above, this seems to be skewed towards that part of the green economy which falls under the policy portfolio of DESNZ. CIWM should call on Skills England, through the auspices of the Industrial Strategy Advisory Council, to include Circular Economy skills in their forward thinking.
- b. Introduce targeted Extended Producer Responsibility (EPR) for several key product types (e.g. WEEE, batteries, textiles, mattresses).
 - i. Well-designed EPR schemes can drive circularity and should therefore be a key element of the new CE Strategy. To date, however, the Government has made no commitments to introduce EPR for waste streams beyond packaging. CIWM should press for new EPR schemes, using the evidence from their 2024 report 'An EPR of Everything, Starting with Batteries!'²⁵
- c. Introduce targets across the top half of the waste hierarchy.
 - i. If the CE Strategy is intended to deliver a genuine circular economy, rather than merely to drive up recycling rates, it will need to include

²⁴ See

www.ciwm.co.uk/ciwm/news/2025/shaping_future_financial_and_fiscal_policies_for_a_more_circular_economy_in_the_uk.aspx.

²⁵ See

www.ciwm.co.uk/ciwm/news/2024/ciwm_white_paper_calls_for_reform_to_uk_battery_recycling.aspx




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policy measures targeted on ecodesign, waste prevention and reuse, since all previous experience shows us that these elements of a circular economy struggle to be mainstreamed without specific policy support (for example, see the Reuse Network's February 2025 Reuse Roadmap²⁶). CIWM should call for this to be part of the CE Strategy, drawing on relevant CIWM and stakeholder reports, as summarised in Part 3 below.

- d. Price raw materials so that prices include negative environmental externalities.
 - i. As suggested in the 2024 R&W Strategy Review, the Carbon Border Adjustment Mechanism (CBAM) could be a useful starting point. The UK is going to introduce a CBAM from 2027²⁷. CIWM should urge the CE Taskforce to consider whether a similar mechanism might be adopted for materials.
- e. Strengthen eco-design and waste prevention.
 - i. As explored in more detail in Part 3 below, the 2024 CIWM Presidential Report, 'Turning Off The Tap', provides a clear set of recommendations for how to promote eco-design and waste prevention. CIWM should continue to encourage the CE Taskforce to consider the report's recommendations.

Part 3: Sector priorities

59. In Part 3, we present a summary of the UK resources and waste sector's priorities and needs, as set out in documents published by CIWM and other key stakeholders.

3.1 CIWM's priorities for the sector

60. CIWM's priorities for the future of the sector are set out in a number of reports, including the CIWM Strategy 2022-2027 and recent Presidential and other reports. These are summarised below.

CIWM Strategy 2022-2027

61. The CIWM Strategy 2022-2027 sets out the Institution's strategic goals and direction for the current period. In summary:

²⁶ See <https://reuse-network.org.uk/wp-content/uploads/2025/02/The-Reuse-Roadmap.pdf>.

²⁷ See www.gov.uk/government/publications/factsheet-carbon-border-adjustment-mechanism-cbam/factsheet-carbon-border-adjustment-mechanism.

- a. CIWM's purpose is 'To move the world beyond waste.'
- b. CIWM's Mission is to 'Unite, equip and mobilise our professional community to lead, influence and deliver the science, strategies, businesses and policies for the sustainable management of resources and waste.'
- c. The Strategy is centred around six themes, intended to enable CIWM to act as a vital change agent for the transition to a low-carbon circular economy:
 - i. Pioneering professional standards;
 - ii. Nurturing innovation;
 - iii. Advocating with an authoritative voice;
 - iv. Enhancing engagement and connectivity;
 - v. Cultivating communities of practice; and
 - vi. Leading through excellence.

CIWM Presidential Reports

62. CIWM is led by a President, each of whom serves a term of one year. Each new CIWM President publishes a Presidential Report on an issue of importance to them and to the Institution. The last four Presidential reports are listed below, and their titles give an insight into current priority issues for the Institution:

- a. Presidential Report 2024 (Tim Walker): 'Turning Off the Tap: Why Better Design Can Increase Resource Resilience and Reduce Consumption';
- b. Presidential Report 2023 (Dan Cooke): 'This Is What We Do: Showcasing A World-Class Sector and the UK's Circular Economy Pathfinders';
- c. Presidential Report 2022 (Dr Anna Willetts): 'Improving the way we regulate circular resources in the UK';
- d. Presidential Report 2021 (Dr Adam Read): 'Skills for the Future: the journey to 2030'.

Other relevant CIWM reports

63. In March 2025, CIWM published 'The systemic impact of ETS on the resources & waste sector'²⁸. This report outlines that when the Energy from Waste (EfW) sector is brought into the UK Emissions Trading System (ETS) in 2028, as part of the UK's approach to decarbonising the economy, the change will produce both opportunities and challenges:

- a. Opportunities: increased plastics separation, chemical recycling, and carbon capture & storage (CCS);

²⁸ See

www.ciwm.co.uk/ciwm/news/2025/ciwm_report_urges_caution_when_introducing_ets_into_uk_energy_from_waste_sector.aspx .

- b. Challenges: ETS will significantly increase the cost of generating energy from residual waste through the UK's network of EfW facilities. Gate fees will increase by around 50%, which could result in an additional £660 million annual bill for UK local authorities, who have very little ability to control the fossil carbon content of the residual waste presented to them.

64. In October 2024, CIWM published a position paper on skills²⁹, responding to the creation of Skills England. This contains three main recommendations:

- a. Diversifying the Apprenticeship Levy to Create a Green Skills Fund;
- b. Developing the UK Green Skills Roadmap; and
- c. Investment in Career Attractiveness.

65. As mentioned in section 2.3 above, CIWM published the report, 'Shaping future financial and fiscal policies for a more circular economy in the UK'³⁰ in December 2024. The report is structured around three overarching aims for resources policy:

- a. decarbonising the waste sector;
- b. increasing recycling; and
- c. reducing resource consumption.

66. The report presents possible fiscal and financial incentives for each aim, and proposes a set of design principles for strong circular policies:

- a. Incentives need more nuance to achieve contemporary circular economy and waste management goals: reuse and reduction, higher quality recycling, and decarbonisation.
- b. Incentives need to be coordinated across value chains, so that actors who are limited in their ability to respond gain the support needed from other sectors.
- c. Both carrots and sticks are needed—without the levers or the funding to respond, punitive incentives are of limited value.
- d. Realistic and reasonable response times to prevent unmanageable short-term costs need to be factored in.
- e. Strong data, monitoring and enforcement are essential to ensure incentives have the intended effects.

²⁹ See www.circularonline.co.uk/wp-content/uploads/2024/10/CIWM-Skills-Position-Paper-1.pdf.

³⁰ See www.ciwm.co.uk/ciwm/news/2025/shaping_future_financial_and_fiscal_policies_for_a_more_circular_economy_in_the_uk.aspx.



- f. Where money is raised through financial and fiscal policies, this could be used to drive system change towards a circular economy.
- g. When developing new policy incentives, the opportunity cost should be considered.

3.2 Other stakeholder perspectives

67. Several stakeholders, including the CBI, ESA, Suez, Green Alliance, the Aldersgate Group and Circle Economy have produced recent reports that are relevant to this analysis. The most pertinent documents are summarised briefly below.

Confederation of British Industry (CBI)

68. According to the CBI³¹, the UK's green economy grew by 10% in 2024, three times the rate of the rest of the UK economy. In addition, the CBI reports that these green jobs are more productive, more highly paid, and more evenly spread across the UK than the average.

69. These conclusions have been echoed previously in reports from Green Alliance³², WRAP³³, the Ellen MacArthur Foundation³⁴ and others. There is a multiplicity of evidence available to demonstrate that moving to a circular economy can help deliver higher growth, greater productivity, more and better jobs, and also tackle the cost of living³⁵. Introducing policies that help the green economy to expand should therefore be a priority for the Government, as it will directly help them achieve their first Mission.

Environmental Services Association (ESA)

70. ESA is the trade association which represents the UK's main recycling and waste treatment service providers. In December 2024, ESA published their 2024 Corporate

³¹ See www.cbi.org.uk/articles/growth-and-innovation-in-the-uk-s-net-zero-economy .

³² See e.g. www.green-alliance.org.uk/publication/employment-and-the-circular-economy-job-creation-in-a-more-resource-efficient-britain/ .

³³ See e.g. www.wrap.ngo/resources/report/build-back-better .

³⁴ See e.g. www.ellenmacarthurfoundation.org/how-does-the-circular-economy-create-value .

³⁵ See e.g. www.green-alliance.org.uk/publication/why-a-circular-economy-is-good-for-people/ .

Report³⁶. This highlights their 'Vision for 2040', where 'a circular economy predominates whereby we maximise the use and value from all materials already extracted and in circulation, while the development of new resources is only done in a sustainable manner that leaves no lasting footprint on the environment for future generations.'

71. To achieve their Vision for 2040, ESA is focused on four corporate priorities:
- Sustainable resource use: 'we will maximise the value extraction from resources already in circulation, leading to more recycling as we increase material recovery and extract energy from non-recyclable waste';
 - Zero carbon: 'we will drive down our carbon footprint, meeting net zero across all our activities by 2040. Our approach to reduce carbon will save the equivalent of 8% of UK emissions and will open up future opportunities to be climate positive. We will strive to be both climate positive and nature positive';
 - Higher standards: 'We will drive higher standards across our own activities, protecting the local environment, the workforce and maximising value for our customers. Our Code of Conduct will embed best practice across our Association'; and
 - Effective Regulation: 'We will work with regulators to drive illegality and poor compliance out of the sector. Together we will ensure that the implementation of regulation is pragmatic and risk-based, enabling innovation while taking strong action against operators which break the rules and harm the environment.'

Suez Recycling and Recovery UK

72. Suez Recycling and Recovery UK, whose CEO John Scanlon is a member of the Net Zero Council, published their manifesto 'Repair, reuse, reform: how to accelerate progress to a circular economy' in January 2025³⁷. Based on their experience, they propose seven steps to mainstream repair and reuse:
- Cut the cost – by reducing VAT on all reused, refurbished, and repaired goods, including parts and labour;
 - Harness skills – implement the ideas of the previous Government's Green Jobs Delivery Group;
 - Build consumer confidence – establish a nationwide accreditation scheme;


³⁶ See www.esauk.org/2024/12/23/thats-a-wrap/.

³⁷ See www.suez.co.uk/en-gb/news/press-releases/250212-re-use-manifesto-asks-government-to--support-fix-first-loved-economy.



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- d. Enable local leadership – give the public sector a clear objective to prioritise re-use;
- e. Keep products in use for longer – increase minimum warranty periods for electrical and household items;
- f. Make repairs accessible – extend ‘Right to Repair’ legislation; and
- g. Invest to grow – create a £250 million Re-use Development Loan Fund.

Green Alliance

73. Green Alliance is an environmental think tank, one of whose main programmes is focused on the sustainable use of resources. They have been running their own Circular Economy Task Force (CETF) under that programme since 2012.

74. In a briefing paper published in December 2024³⁸, Green Alliance’s CETF set out five tests to judge whether the Circular Economy Strategy for England is likely to be transformational or not:

- a. Does it futureproof long-term growth, identifying how to account for the financial risks of linear models and supply chain disruption?
- b. Does it rebalance the investment environment to enable circular businesses to thrive?
- c. Does it set a long-term goal to bring UK resource use within planetary boundaries?
- d. Does it establish a robust framework for key sectors to deliver against overarching aims?
- e. Is the whole government behind the strategy for the long term?

Aldersgate Group

75. The Aldersgate Group (AG) is an alliance of major businesses, academic institutions, professional institutes, and civil society organisations driving action for a sustainable and competitive economy.

76. AG strongly supports moving to a circular economy, noting that ‘An effective and expanded circular economy could create over 450,000 jobs by 2035, including in regions where there is persistent unemployment. Keeping products and resources in use for as long as possible has the potential to lower production costs, increase supply security, and secure long-term competitiveness.’

³⁸ See www.green-alliance.org.uk/briefing/five-tests-for-englands-circular-economy-strategy-will-it-deliver-a-transformation/.

77. In their April 2024 manifesto³⁹, ahead of the General Election, AG called for six priority actions on circularity:
- a. Urgently implement the policy proposals first set out in the 2018 Resources and Waste Strategy;
 - b. Introduce fiscal mechanisms to reflect the whole lifecycle economic and environmental benefits of using secondary materials;
 - c. Provide public finance through the UKIB to support the development of vital infrastructure;
 - d. Develop criteria for the £290 billion spent annually by the UK on public procurement;
 - e. Use tax incentives to incentivise waste management and sorting companies to supply valuable scrap and waste materials to UK industry; and
 - f. Introduce a statutory target on resource productivity.
78. In addition, in a July 2024 briefing paper on placing decarbonisation at the heart of industrial strategy⁴⁰, they highlighted opportunities to embed circularity within a whole-value chain approach to industrial strategy.

Circle Economy

79. Circle Economy published the 'Circularity Gap Report for the United Kingdom' in March 2023⁴¹. It concludes that the UK is only 7.5% circular, with a 92.5% 'circularity gap'. It notes that:
- a. The top 10 industries contributing 45% of the UK's material footprint sit within four sectors: Construction, Services, Agrifood, and Manufacturing and Processing.
 - b. The top 10 industries contributing 38% of the UK's carbon footprint are a combination of five sectors: Construction, Services, Agrifood, Energy and Transport.
 - c. The country's efforts to cut material and carbon footprints should target these sectors.

³⁹ See www.aldersgategroup.org.uk/publications/post/the-aldersgate-group-publishes-its-programme-for-government-catalysing-investment-in-climate-and-nature .

⁴⁰ www.aldersgategroup.org.uk/publications/post/placing-decarbonisation-at-the-heart-of-industrial-strategy/ .

⁴¹ See www.circularity-gap.world/united-kingdom .

80. The report also notes that 'By bolstering the circular economy, the UK can cut its material footprint by 40% and slash its carbon emissions by 43%.'

3.3 Wider contextual issues

81. here are several wider issues which have implications for the circular economy policy agenda, and which therefore need to be taken into account in this review. I highlight four below:

- a. The agenda of the current US and Chinese Administrations;
- b. The war in Ukraine;
- c. Current negotiations over the UK-EU relationship; and
- d. The results of the English local elections on 1 May 2025.

The agenda of the current US and Chinese Administrations

82. Since taking office in January 2025, US President Donald Trump has introduced a number of radical policies that represent a major departure from the expectations that most other countries have had of American policy over recent decades. The Prime Minister of Canada and the Chancellor of Germany have both stated on the record that they no longer see the US as a reliable partner, while the US and China are currently engaged in a tariff war which threatens a global recession.

83. This year is also pivotal in China's policy landscape, marking the end of its current Five-Year Plan and setting the stage for the Communist Party of China Central Committee to put forward proposals for the 15th Five-Year Plan in the autumn. The Plan, which will cover the period from 2026 to 2030, is expected to focus on improving economic resilience, and boosting China's technology and innovation capabilities.

84. Under these circumstances, policies which make the UK more resilient to global supply chain shocks – such as moving to a more circular economy – should be an urgent priority for the UK Government.

The war in Ukraine

85. Russia's invasion of Ukraine in February 2022, and the more than three years of war that has resulted so far, has had many tragic implications. Of most relevance to this report, however, is that the war's impact on global supply chains has had a direct impact on the UK's energy and food security. As per the previous point, this

highlights the need for policies which increase the UK's energy and resource resilience, such as moving to a circular economy.

Current negotiations over the UK-EU relationship

86. At the time of writing, the UK and the European Union are engaged in a negotiation which could lead to closer cooperation across a number of policy areas, including trade, security and food. The implications are currently unclear, but could potentially lead to closer future alignment between some areas of UK and EU environmental policy (e.g. as of 19 May, this appears likely to happen for the UK and EU Emissions Trading Systems⁴²). This could have consequences for UK CE/R&W policy in future, and will need to be kept under review.

The results of the English local elections on 1 May 2025

87. The local elections held in various parts of England on 1 May led to the Reform UK party moving from having zero councillors nationally to having 677 councillors and gaining control of ten councils. Reform UK have an explicitly climate-sceptic policy agenda and in their previous guises (e.g. UKIP) have campaigned against alternate weekly collection of waste and other progressive environmental policies. There is already evidence that the rise of Reform UK in the polls is leading the Government to shift its focus towards what are seen as 'bread-and-butter' policies that deliver directly for the general public. There is a risk that this could reduce the time, attention and resources given to the environmental policy agenda in general, and the CE/R&W policy area in particular.

Part 4: Gap analysis and recommendations

4.1 Gap analysis

88. A review of the material in Parts 1 to 3 identifies several potential gaps and challenges:

- a. The Government is running several large policy reviews (the most relevant of which are discussed in section 1.2) in parallel with each other. It is difficult to see how all those involved in one review will be able to keep fully abreast of developments in all the others as they evolve. There is therefore a risk that the policies that result will diverge from each other over time, with the potential to be in conflict.

⁴² See www.gov.uk/government/news/pm-secures-new-agreement-with-eu-to-benefit-british-people.

- b. The Government appears to recognise the importance of circular thinking at an early stage of policy formulation in the work of the Circular Economy Taskforce. However, it is much less clear whether this is true for the Net Zero Council, the Industrial Strategy Advisory Council, or Skills England, where circular principles appear to be largely missing from their terms of reference.
- c. The Government is creating multiple sectoral roadmaps for different purposes, including five under the Circular Economy Taskforce, an undefined number under the Net Zero Council, and eight under the Industrial Strategy Advisory Council. It is unclear how joined up these will be. There appears a high risk of confusion amongst the broad stakeholder community over which sectors are focused on which priority issues under which roadmap – even if those directly involved in any particular roadmap are clear what they are (or are not) doing.
- d. The wider context within which these policy processes are evolving present both opportunities and potential threats:
 - i. The geopolitical situation (e.g. US tariffs, new Chinese five-year plan, Ukraine war) highlight the value of greater UK (resource) resilience, which a circular economy can provide;
 - ii. High levels of electoral dissatisfaction in England (as evidenced by the local election results on 1 May) are already leading to calls for a refocusing of attention away from the sustainability agenda towards ‘bread-and-butter’ issues. Even if this does not manifest in the outright cancellation of relevant programmes, it could have just as serious an impact if they are starved of the necessary resources and funding, leading to the continuation of ‘business-as-usual’ linear policies.
- e. Of most immediate interest to CIWM and the CE/R&W sectors, the Government’s emerging CE policy agenda will need to be carefully integrated and coordinated with the delayed implementation of the major policies contained in the Resources & Waste Strategy for England 2018. This may be challenging. There is a risk that, in attempting to square this circle, the Government will either:
 - i. sacrifice any radical new CE policies on the altar of rolling out existing policies which have had a lot of time and effort invested in them by officials and stakeholders; or
 - ii. try to introduce a radical new (Labour) agenda in place of the roadmap of currently planned (Conservative) policies, leading to resistance from stakeholders and confusion amongst the general public.



89. The recommendations below are proposed as ways in which CIWM can engage with the policy discussion as it evolves, demonstrate thought leadership, and try to address these gaps and challenges.

4.2 Recommendations

90. On the basis of the analysis above, we propose ten recommendations for positions that CIWM should adopt:

- a. The Circular Economy should be central to the Government's thinking, since it drives economic growth and jobs, cuts carbon emissions, and so directly supports the Government's first and second Missions;
- b. Cross-Government policy integration will be vital;
- c. It is not too late to influence Skills England to ensure incentivisation of skills initiatives in our sector;
- d. Resource resilience should remain a focus area for CIWM;
- e. EPR for new waste streams, including WEEE, batteries, textiles and mattresses, should remain a priority, once the principle has been successfully proven;
- f. Reuse needs policy support to encourage take-up and scaling;
- g. The publication of Dan Corry's review of Defra's Regulatory Landscape provides an influencing opportunity for CIWM;
- h. The increased cost of EfW, arising from bringing it into the UK ETS, should be reflected in pEPR fees;
- i. The Resources & Waste Strategy 2018 reforms still need to be fully implemented; and
- j. Tackling waste crime needs more focus and additional resources.

91. Each of the above points is briefly expanded upon below.

The Circular Economy should be central to the Government's thinking, since it drives economic growth and jobs, cuts carbon emissions, and so directly supports the Government's first and second Missions

92. As discussed in section 3.3, the CBI, Green Alliance and several others have demonstrated that the green economy, of which the circular economy is a key part, is growing faster than the rest of the economy, and that green jobs are more productive, better paid, and are distributed more evenly across the UK. Moving to a circular economy will therefore directly support the Government's first Mission, to grow the economy, increase productivity, create jobs and tackle the cost of living crisis.

93. Moving to a CE also cuts carbon emissions. As discussed in section 3.3, the Circularity Gap Report for the UK states that moving to a circular economy could cut UK carbon emissions by 43%. Moving to a CE therefore supports the Government's second Mission.

94. In addition to the Strategies discussed in section 1 above, the Government also has an ambitious broader agenda for economic growth, house building and new infrastructure. These policies will have significant implications for UK resource use, and all could benefit from circular thinking at the design stage.

95. CIWM should therefore push strongly for the CE to be central to the Government's thinking. CE principles need to be a core component of all the Government's policies and strategies, not just the CE Strategy.

Cross-Government policy integration will be vital

96. We need the CE Strategy, Net Zero Strategy, Industrial Strategy, Critical Minerals Strategy and the work of Skills England to be closely aligned. The CE Taskforce is set up to achieve cross-Whitehall integration, as it reports to a group containing Ministers from six different Departments, but the picture is less clear for the other policy areas.

It is not too late to influence Skills England to ensure incentivisation of skills initiatives in our sector

97. It appears that the remit and activities of Skills England are still under discussion, with probable input from the Industrial Strategy Advisory Council. CIWM should aim to influence both of those bodies as soon as possible, in order to get CE skills included as a focus area for Skills England.

Resource resilience should remain a focus area for CIWM

98. The value of CE in improving resource resilience is directly relevant to current geopolitical uncertainties (e.g. US & Chinese Administrations, Ukraine). CIWM should integrate it into our overall ask on the CE Strategy for England, as well as the Net Zero Strategy, Industrial Strategy and the Critical Minerals Strategy.

EPR for new waste streams, including WEEE, batteries, textiles and mattresses, should remain a priority, once the principle has been successfully proven

99. EPR for packaging, as proposed in the Resources & Waste Strategy 2018, is in the process of being implemented across the UK. Several challenges to success have been identified by stakeholders, and these will need to be overcome, demonstrating that EPR can work in the UK context, before the policy can be extended to other waste streams.

100. Nonetheless, EPR schemes have been successfully implemented in many other advanced economies, with highly performing examples to be found, for example, in Germany, Sweden, France, and the Canadian province of British Columbia⁴³.

101. At a time when public finances are under pressure, EPR is a concrete way of ensuring that businesses pay for the costs of policy reform, in line with the polluter pays principle. It is important to recognise that the costs that businesses have to pay under a well-designed EPR scheme are not new costs – at the moment, they fall to the public sector, and we all pay for them through our taxes. EPR simply moves those costs from the public to the private sector, incentivising producers to reduce those costs through better design of their products (and packaging).

102. As discussed in section 2.3 above, CIWM's July 2024 report 'An EPR of Everything' provides the evidence, suggesting that EPR should be introduced for several new waste streams (e.g. WEEE, batteries, textiles and mattresses) as an early priority.

Reuse needs policy support to encourage take-up and scaling

103. As discussed in sections 2.3 and 3.2, recent reports from Suez and the Reuse Network clearly indicate that the mainstreaming of reuse and repair will require targeted policy support.

The publication of Dan Corry's review of Defra's Regulatory Landscape provides an influencing opportunity for CIWM

104. Dan Corry's review of Defra's regulatory role was commissioned by the Environment Secretary, Steve Reed MP. Since Reed has publicly welcomed the

⁴³ www.pollution.sustainability-directory.com/question/which-countries-have-the-most-effective-epr-programs

report, it seems likely that many of Corry's recommendations, which include several for improving waste regulation, will be implemented.

105. As Defra considers how to implement the report's recommendations, CIWM should take the opportunity to engage with Defra on their proposals for regulatory reform, as set out in the 2024 RWS Review and in Dr Anna Willetts' 2022 Presidential Report, 'Improving the way we regulate circular resources in the UK'. If CIWM maps its proposals onto those in the Corry Review, they stand a better chance of successful adoption.

The increased cost of Energy from Waste, arising from bringing it into the UK ETS in 2028, should be reflected in packaging EPR fees

106. When Energy from Waste (EfW) plants are brought into the UK Emissions Trading Scheme (ETS) in 2028, as discussed in section 3.1, it is likely to increase EfW costs significantly. There is a strong argument for transferring the increase in costs into the packaging EPR system (e.g. through changes to modulated pEPR fees), since 70% of material sent to EfW is packaging, and brands and producers have much more control over the fossil carbon content of their packaging than local councils do. This will incentivise them to decarbonise packaging, in line with the aims of the UK ETS.

107. As noted in section 3.3, the May 2025 UK-EU post-Brexit deal may lead to the UK ETS and EU ETS being brought together. The timescales for, and implications of, such a change are, at present, unclear, but will need to be kept under review.

The Resources & Waste Strategy 2018 reforms still need to be fully implemented

108. As discussed in section 2.2 above, although the major policies from the R&WS 2018 (i.e. pEPR, Simpler Recycling and DRS) are now well into the implementation phase, there remain many practical issues to resolve, such as the need for regulatory enforcement, if policies like Simpler Recycling do not have their intended effects.
109. At the same time, there are other important policies – including long overdue reforms to the Waste Carrier, Broker and Dealer registration system, the delayed introduction of Digital Waste Tracking, and changes to the producer responsibility regimes for Waste Electrical and Electronic Equipment (WEEE) and Batteries – that appear to be stuck in limbo.

110. Six and a half years after publication, it is well past time that the Resources & Waste Strategy for England was fully implemented.

Tackling waste crime needs more focus and additional resources

111. The waste industry estimates that 34 million tonnes of waste (18%) is illegally handled. The waste crime that results is costing an estimated £1 billion a year in England alone⁴⁴.
112. On 29 April 2025, Defra announced a rapid review intended to lead to the introduction of new powers and increased resources to help local authorities tackle local waste crime⁴⁵. This is very welcome.
113. However, the Government's proposals to simplify the landfill tax (see section 1.2 above) could potentially lead to millions of extra tonnes of waste facing the standard, rather than lower, rate of landfill tax. This could lead to further instances of waste crime, as some waste producers try to avoid these higher costs through illegal actions. It will be important for the final package of landfill tax reforms to address this risk, including through providing greater resources for enforcement activity.
114. As discussed in the previous recommendation, the sector is still waiting for the long-delayed implementation of reforms to the Waste Carrier, Broker and Dealer registration system, and the introduction of Digital Waste Tracking. Both reforms will be of great value in tackling waste crime, making their urgent implementation even more important.
115. Given the above, CIWM should continue to call for an increased focus on waste crime from the Government, to tackle illegal activity, reduce environmental harm and prevent legitimate waste firms from being undercut.

⁴⁴ See <https://environmentagency.blog.gov.uk/2025/05/07/working-together-to-stop-waste-criminals/>.

⁴⁵ See www.gov.uk/government/news/councils-to-seize-and-crush-fly-tipping-vehicles-to-clean-up-britain.