I am writing as part of the above call for views on behalf of the John Lewis Partnership (JLP). Across the UK, the Partnership operates 27 department stores johnlewis.com, 198 Waitrose supermarkets and Greenbee.com, a direct services company. The business has an annual turnover of over £6.8bn. It is the UK’s largest example of worker co-ownership where all 69,000 staff are Partners in the business, sharing in its decision making and in its financial success. We welcome the opportunity to contribute to the committee’s call for views and support the Scottish government’s commitment to tackling climate change through the Climate Change Bill and more specifically its aim of zero waste.

The John Lewis Partnership’s waste strategy is based on our ambition to divert our waste from landfill by reducing, reusing, recycling or recovering energy from all our commercial waste and packaging. We have an overarching target to divert 95% of our waste from landfill by 2013. Delivery of this is supported by a range of specific targets and initiatives in John Lewis and Waitrose.

In summary:

**Waitrose targets**
- Recycle 75% of all Waitrose waste by year-end 2012
- Reduce own-brand packaging by 2013 on a like-for-like basis, compared with 2005, and work with suppliers to encourage similar reductions
- Apply packaging recyclability labelling to own-brand products by year-end 2009
- Continue to explore ways to reduce food waste and provide practical information in-store and online to raise customer awareness of this issue
- Continue anaerobic digestion trials

**John Lewis targets**
- Recycle 50% of all John Lewis waste by year-end 2010
- Help achieve the collective retailer, WRAP, Government target of a 50% reduction in single use carrier bags

**Scottish Government’s zero waste proposals**

**Question 15 – Recycling**

The Partnership believes that as a responsible retailer it is helping to establish examples of best practice in this area. The Scottish Government’s packaging and waste proposals are welcomed and we supporting voluntary codes to take these forward. These have worked well in the past and good progress is being made. Regulation seems to us unnecessary where voluntary agreements with industry could produce as constructive and positive outcome.
The Partnership actively encourages customers to recycle both in and out of the home. We have highlighted some of the recycling initiatives and our efforts to encourage customers, below:

**Recycling initiatives**
Our waste and recycling procedures continue to deliver significant improvements, helping us towards our ongoing objective to divert 95% of our waste from landfill. In 2008–09, Waitrose diverted half (50%) of our waste, saving over 23,257 tonnes from going to landfill.

In an attempt to maximise the recycling opportunities across the business, our efforts have included:

- introduced battery recycling and polystyrene briquette-making at Cambridge
- shared backhauling capacity at Rushden and in Scotland
- plans to send non-recyclable waste from the Waitrose head office in Bracknell to the first purpose-built ‘energy from waste’ incineration facility, due to be commissioned next year.
These procedures continue to deliver substantial cost savings and a step change in our waste recycling. In 2008/09 John Lewis we diverted 4,814 tonnes of waste from landfill (43%).

A collaborative arrangement sees cardboard and polythene bales from Waitrose Comely Bank, as well as segregated waste material from John Lewis Edinburgh, backhauled to our local Distribution Centre.

Under the terms of the Packaging Waste Regulations, we are also legally obliged to recover and recycle 55–80% of our product packaging. We do this by contributing over £1 million a year towards a recycling compliance scheme, which invests in kerbside collections and public recycling centres so that customers can recycle the packaging they take home. We also use returnable transit packaging for around 41 million trips annually through our Waitrose supply chain. We encourage Local Authorities to offer other recycling points in our Waitrose car parks, where space permits, for materials such as clothing, glass and paper, and encourage customers to reuse and recycle plastic bags, or switch to more sustainable alternatives. There are also carrier bag recycling facilities in Waitrose shops, with certain John Lewis shops trialing such facilities.

**Encouraging customers**

To help our customers to recycle, where possible, we clearly identify the materials used in our own-label packaging, and we have recently worked with the Waste and Resources Action Programme (WRAP) and other retailers to develop concise, consistent recycling messages on back of pack.

We fully support the Waste Electrical and Electronic Equipment (WEEE) Regulations which allow people to recycle old electrical and electronic appliances at sites across the UK, free of charge. The Partnership has contributed funds to the Distributor Take Back Scheme, which we helped to establish. This scheme is investing £10 million in local recycling facilities so customers can locally recycle their waste electrical and electronic items.

As a manufacturer of own-brand electrical products, we also have a responsibility for recycling waste electricals. So we are funding a compliance scheme to do this on our behalf. Our customers can learn more about the legislation, and their recycling options, through in-store leaflets and online at www.recycle-more.co.uk. All John Lewis and Waitrose Food and Home shops also offer mobile phone recycling.

**Fighting food waste**

Waitrose is the first national food retailer to successfully trial anaerobic digestion as a food waste solution. A trial for the past three months at five Waitrose branches (including Scotland) has been successful in sending food waste, both naked and primary packaged, to an anaerobic digestion plant in north Bedford. This has turned 251 tonnes of food waste into 50 megawatt hours of electricity - enough to boil 12,000 electric kettles for one hour.
This initiative will see us routing approximately 25% of the Partnership’s food waste to electricity production - rather than to landfill. The cost to do so is neutral compared to the current collection method of transporting food waste to landfill. However, as landfill costs continue to rise, this approach will reduce our future costs.

In addition to the energy which is generated, the digestate residue from the process, which is high in nitrates, can be spread on the land at certain times of year as a fertiliser to grow crops - and no damaging methane gas is released into the atmosphere.

The only constraint is that today the number of anaerobic digestion plants is very small as it is new technology to this country. As plants proliferate there is every reason to believe that all our food waste could be recycled in this manner.

Packaging
We are actively pursuing a policy of packaging reduction. While we agree with the assertion that there is significant scope for the reduction in packaging, certain types of packaging are essential to ensure that goods remain undamaged in transit and are hygienically presented to consumers. Any new regulations in this area should take account of this.

We have set out below the work we are doing in this area and believe that a combination of guidance and voluntary action will achieve further significant progress. The Scottish Government’s proposal to detail and report on all types of packaging for shops the size of John Lewis and Waitrose would require significant resource allocation, time and investment. We believe that as long as retailers are setting ambitious targets and meeting those targets such an approach is unnecessary.

Reducing packaging
We continually strive to find a balance between reducing packaging and making sure it still protects our products in transit and on the shelf. Waitrose, is a signatory of the Courtauld Commitment and has helped WRAP achieve the first Courtauld target of eliminating packaging growth, despite a sharp increase in sales. Waitrose has itself reduced packaging consumption relative to sales by 36% since 2000 and our packaging designers are working to improve its performance and, where possible, reduce its weight. As part of our commitment, 50% of our organic produce now comes in degradable, biodegradable or compostable packaging. John Lewis is also playing its part in reducing packaging.

Specifying recyclate
We are also looking at introducing products and packaging utilising recycled materials. However, we believe that business should be given the flexibility to innovate in this area without the constraints of legislation. Introducing recycled content tends to increase weight, which provides a challenge, as many of the measures currently in place are weight based.
Waste Prevention Plans
The John Lewis Partnership through its varied initiatives is committed to preventing waste. Guidance and voluntary action supported by government will help drive good practice and ensure that companies who already undertake measures to prevent waste continue to set and achieve ambitious targets. Also opportunities to share best practice and provide an ‘incentive’ to other companies at the start of the waste journey.

Deposit and Return
We would be willing to work with government to extend customer educational programmes and encourage the public to take responsibility for recycling and reducing the impact of their personal waste. Waste reduction on a large scale will only happen if the general public are educated, provision is made locally and responsibility is taken at home for personal waste. The implications of this scheme are difficult to quantify and may prove challenging and resource intensive to implement. Any such scheme also needs to be backed up by comprehensive consumer research to evidence their effectiveness and joined up with wider and more integrated waste management measures.

Mandatory Waste Data Returns from Business
We believe that a mandatory approach to data returns is unnecessary and would be expensive and bureaucratic to set up and operate. The voluntary targets and existing measures are designed actively to reduce consumption, recycle, reuse and dispose of waste sustainably. Such a measure, in our view, would only serve to add further layers of bureaucracy where that none are necessary. We already provide data as part of our Packaging Waste and WEEE obligations (this will soon include Batteries as well). Also, we voluntarily report data for Waitrose as part of our commitment to the Courtauld Commitment and the Voluntary Agreements on carrier bags. We also participate in the British Retail Consortium’s Better Climate Initiative. In addition, we voluntarily report our performance across this whole area through our Corporate Social Responsibility work.

Other measures to encourage waste prevention, including action on single-use carrier bags
We agree with the Scottish Government’s voluntary approach to plastic bags. We have carefully evaluated all options open to us for driving a reduction in customer usage. We firmly believe that a national campaign supported by both retailers and Government is the only way to change people’s habits. This is why both John Lewis and Waitrose signed up to the initial Government Voluntary Code of Practice on Carrier Bags in 2007 and the more recent agreement with food retailers. As part of this commitment we have installed many practices to reduce the environmental impact of our carrier bags and to discourage use or encourage reuse. In Waitrose activities such as increased Partner training, prominent customer communications instore, ensuring our mainline checkouts are visibly clear of carrier bags and offering customers a Bag For Life before any single use bags are dispensed, has already helped us to achieve a cumulative reduction in carrier bag usage to date of 37.5% (avoiding the use of around a million bags). Waitrose is optimistic that we can achieve an overall 50% reduction by May 2009 and build on this longer term.
In John Lewis, the introduction of a Bag for Life has also helped drive reductions in free issue plastic bags. John Lewis are also working to introduce a wide variety of reusable bags to help drive further reductions in carrier bag usage.

Summary
The John Lewis Partnership welcomes the Scottish Government's commitment to 'zero waste'. We take pride in our reputation as a responsible retailer and we are committed to reducing, reusing, recycling and disposing of waste responsibly. We believe that a voluntary approach, supported by the sharing of good practice and government guidance is the right approach. A statutory approach may add unnecessary and cumbersome levels of bureaucracy and cost. These could place Scottish companies at an unfair competitive disadvantage.

We would welcome the opportunity to engage with the Transport, Infrastructure and Climate Change Committee and the Scottish Government to take any of these proposals forward.

John Lewis
5 March 2009