



Response to National Needs Assessment: Assessment of UK national economic infrastructure

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About DS Smith

DS Smith is a leading provider of corrugated packaging in Europe and of specialist plastic packaging worldwide, operating across 32 countries. It employs 24,700 people, with a turnover of £4,035 million and is a constituent of the FTSE250.

DS Smith welcomes the establishment of the National Infrastructure Commission and the National Infrastructure Assessment and welcomes the opportunity to contribute towards this National Needs Assessment (NNA).

Do you agree with our proposed vision and outcomes? What amendments would you propose?

DS Smith agrees with the vision and outcomes of the NNA, a broader view of infrastructure requirements is required, and DS Smith particularly welcomes the emphasis on shifting towards a low-carbon future. DS Smith sees this as a priority and believes the pace of the shift is important – hence priority should be given to low carbon technologies and projects.

DS Smith believes it is important to incorporate a definitive strategy to achieve a low carbon economy when developing plans for the UK infrastructure.

Similarly we welcome the recognition that the delivery of a comprehensive national infrastructure needs to have flexibility built into it so the increasingly frequent changes in technology and consumption patterns can be accommodated.

What will be the main drivers of demand for UK national economic infrastructure over the next 35 years that we should consider in our assessment?

It will be difficult to consider drivers in isolation and it will continue to be important to consider environmental needs alongside economic ones.

Increased demand through growing population will continue to increase the consumption of resources in the short term but one driver should be to decouple growth from increasing resource consumption and waste as part of delivering a more circular economy.



Improvements in telecommunication technologies are already changing the way the country works, offering greater workplace flexibility through video conferencing etc, but it is essential that every area of the country and every size of business can access these improved communication technologies as they develop.

Environmental protection and mitigating the effects of climate change are already on the agenda but exact strategies and support of these strategies still need to be developed and prioritised.

For example, definitive strategies for robust flood and sea defences and policies that drive companies and organisations to introduce low carbon technologies within their businesses are required.

Improving resource use should be incorporated into all business planning and the benefits of doing so properly communicated.

Moving towards a circular economy, whether it is the recycling of resources or the introduction of different business models, such as leasing or renting goods and services, is crucial for a future sustainable economy.

What will be the main constraints on the UK's ability to provide sufficient UK national economic infrastructure assets and services over the period and what solutions or mitigations of those constraints should the UK adopt?

The lack of data, particularly on waste generation in the commercial and industrial (C&I) and construction and demolition (C&D) sectors means there is no true picture of the state of play. This is of particular concern as C&I waste is three times that of municipal waste. This uncertainty means it is difficult to assess where and what type of new facilities are required. The lack of accurate data impacts on the confidence to invest in new facilities by both the waste management industry and new investors.

Without this understanding it is difficult for government to formulate policy to effectively manage resources efficiently and to develop a circular economy.

While there has been much debate about improving resource efficiency and adopting a more circular approach to the ways resources are utilised there is still little evidence of how resources are managed across UK companies and organisations. DS Smith agrees with the recommendation put forward by the APSRG (All Party Parliamentary Sustainable Resource Group) within its report "Link to Link: Driving resource efficiency across supply chains", to conduct a call for evidence on the state of play of resource efficiency in UK companies and to determine the barriers preventing companies becoming more resource efficient.



Reviewing legislation will enable infrastructure development in the waste and resource management sector. For example banning materials from landfill or disposal will lead to investment in AD throughout the UK. Scotland has seen an increase in investment in AD plants after the Scottish Executive introduced regulations on the collection of food waste.

What nationally significant investments in capacity or changes in policy & regulation should we prioritise to deliver these outcomes and deal with these drivers of demand?

The current collection of waste data needs to be reviewed and data from the C&I and C&D sectors needs to be included. Recent studies have shown that data is only collected and reported where it is regulated. There is currently no duty on waste producers to report data unless their waste is subject to regulations such as producer responsibility legislation or if it is hazardous waste. The government should consider widening the scope for data collection for a wider part of the waste stream.

DS Smith suggests widening the use of Edoc (Electronic Duty of Care), improving the frequency of data collection and reporting and reviewing current datasets to generate a proper understanding of the generation and management of waste.

In what areas can demand management or other forms of behavioural change make a significant impact? What are the blockers and enablers for realising these opportunities?

Increased reuse and recycling can reduce the need for waste disposal facilities. Infrastructure already exists but effort and investment is required to enforce existing legislation and communicate the benefits in order to deliver behavioural change.

Alternative economic models giving greater public discretion combined with improved communications offer the opportunity to reduce demand. For example trialling pay as you throw schemes for waste and recycling collection may make people take greater responsibility for their waste and give a greater understanding of the impact of the waste generated. A reluctance to try different approaches may be holding back innovation that could avoid the necessity for big infrastructure builds.

How can greater cross-sectoral decision making be encouraged?

DS Smith is a member of a number of trade associations such as the Resource Association and INCPEN. The Government can engage at an early stage with such organisations to ensure cross-sectoral views are taken into account.

Cross-sectoral decision-making is important, ensuring different industries views are considered but equally important is collaboration across Government departments.



What opportunities and challenges are presented by devolution of infrastructure decision making?

In the waste and recycling sector devolution has led to different interpretations of regulations, different delivery of services and differing performance on recycling. Whilst these approaches can lead to innovation, which is very welcome and local decision making should be encouraged, without a UK overview there is a danger that overall UK waste and recycling performance will be fragmented.

Devolution has created regions where strong innovation has been allowed to happen despite an apparent vacuum of central decision-making. It is important that the lessons and successes gained in Scotland and Wales are shared centrally through a national plan.

A UK overview is required in order to create the conditions for investment in large-scale infrastructure such as paper mills, plastic recycling facilities or waste-to-energy plants.

What new and emerging technologies and disruptive trends should we consider in producing this assessment?

There is a vast array of emerging technologies across the complete spectrum of human activity – keeping up with developments is a constant challenge.

The paper industry has seen a rapid decline in the use of newsprint due to electronic media, resulting in the closure of large-scale facilities. Light weighting has affected packaging volumes and the mix of recycled papers has changed as newsprint use has declined and home shopping volumes have increased.

Carbon Negative manufacturing is one of many disruptive trends that has gained ground in recent months as Hewlett Packard and The Body Shop have invested in a technology that manufactures plastic from methane produced during various waste processes (landfill and anaerobic digestion).

Other examples include improvements in telecommunications, 3D printing, Nano technology and RFID systems that will all affect resource consumption and supply cycle infrastructure.

Provision for improving data collection on the current situation and engaging with industry associations and experts to understand new technologies and forecasts should be included in this assessment.



How can we improve public engagement in infrastructure decision-making?

Proper consultation and engagement programmes are the only way to improve public engagement in infrastructure decision-making. This means ensuring the public are given all the facts and are given the opportunity to discuss their concerns on the issues with the knowledge that these will be taken into consideration in the final decision-making process. Engaging with as many stakeholders as possible including pressure groups such as 38 Degrees would also reach a wider range of the population.

Presenting developments at a local level, in the context of a consistent national plan are likely to improve public engagement.