



New Generation Claims Group: No time to waste

An exploration of how the insurance
profession can utilise landfill avoidance
solutions to maximise sustainability in claims



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Foreword

Civilisation as we know it has existed for over 6,000 years. Prior to the advent of globalisation, a circular approach to consumption was a necessity by reason of cost and availability of materials. Modern globalisation, and the ensuing rapid (over)consumption of raw materials, only accounts for the last 50 - 100 years of human history. It therefore seems feasible to return to our roots and prioritise 'greener' practices, and quite strange that 'environmentalists' are treated as a separate group of people. To put it bluntly, 'the environment' is not an abstract concept that occurs elsewhere in the world - it is the very place in which everyone on Earth lives. Not only this, but everything you have ever used in your life still exists on the planet in some form, even if you cannot see it before you.

Where does the insurance industry come into this? We know that insurance is a powerful tool that can enable a vast array of possibilities, from opening a small business to sending people into space. If the industry can help people do those things, and all sorts in between, then enabling sustainable claims outcomes for businesses and consumers seems well within our grasp. Outside of the industry, we are already seeing growing push-back against rampant consumerism (such as 'de-influencing', which promotes not buying things we do not need), and generally a reinvigoration of the importance of sustainability and 'being green'. This is especially the case amongst younger people who, as we know, are the future of our industry. If sustainability is an important factor for them then we must promote it as an industry to attract future talent and improve upon the 4%(!) of young people who want to enter the industry. This is especially urgent given it is estimated that 25% of the sector are due to retire in the next decade, so a 'generational hand-over' is somewhat imminent.

We would be remiss to not mention that clearly this Project, and the initiatives it discusses, do not operate in a vacuum. Competing considerations (particularly financial concerns, such as a softening Market, cost of living crisis, and tariffs causing disruption to global financial markets) of course factor into sustainability-focussed decision making. However, we cannot fall victim of 'short-termism', particularly when our industry positions itself as innovative. In fact, the Top 10 insurers (by size) in the UK all publicly refer to 'innovation' as being important to various aspects of their business, and we believe that you would be hard pressed to find an insurer saying the opposite! As innovators, we should not be asking ourselves "what is the risk of doing something?" but instead "what is the risk of doing nothing?" Globally, we are looking down the barrel of a Climate disaster and if we (and other industries) do not course-correct then that will be the end of the game.

As the World Business Council for Sustainable Development puts it: "business cannot survive in a world that has over-consumed its natural, human and social capital."¹ It is therefore the view of this Group that it is in everyone's best interests to consider their impact on the environment and engage with sustainability-focussed initiatives to improve sustainability in our profession and the world around us.

The claims team.



"The New Generation Programme gave us the opportunity to connect with talented colleagues across the industry and provided a novel way of improving our skills outside of our daily roles. We have all thoroughly enjoyed the new experiences we have had, including speaking to industry regulators, connecting with senior professionals, and excitingly visiting Parliament (including attending the Insurance and Financial Services All Party Parliamentary Group to present on our Project.) We would highly recommend the Programme to anyone interested in leaving a lasting impact on the profession and would like to extend our thanks to the CII for the chance to collaborate with each other."

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Executive summary

This Paper explores the successes and challenges in diverting claims-related waste from landfill in UK Retail Motor and Home insurance claims. It also offers potential solutions to improve sustainable waste handling in Claims.

Through making decisions on repair, replacement, and disposal, insurers play a key role in determining the pathway of large volumes of materials which could have a second life. Claims-related waste is somewhat of an overlooked issue and indeed the Authors of this Paper experienced difficulty with quantifying the amount of claims-related waste the industry handles – and how much of it goes to landfill. What we do know is that insurers process hundreds of thousands of Motor and Home claims each year, many of which will invariably produce some form of waste.

The insurance profession is supported to some extent by the UK's waste regulatory framework, though insurers as waste handlers/managers are omitted from specific mention. As regulatory intervention increases and expectations of credible ESG commitments continue to rise, insurers will no doubt find themselves under greater scrutiny when it comes to sustainability, for example through the advent of Scope 3 Carbon Emissions reporting.

At present, Retail Motor is an area of real success in landfill-avoidance, with increasing Green Parts usage and high recycling rates for End-of-Life Vehicles. In contrast, Home Insurance does not benefit from such a well-developed and resourced supply chain, meaning landfill-avoidance measures are more difficult to implement. More commonly, Home relies on replacement and cash settlements, meaning that there are recoverable / repairable items needlessly going to landfill.

In general, common barriers to handling claims-related waste in a more sustainable manner include financial challenges, lack of data / measurable outcomes, transparency from the supply chain, limited employee empowerment, and lack of consumer appetite for measures which could increase the price of the product. This Paper's Authors identified, through an industry survey, that whilst sustainability on the whole is viewed positively in the profession there was a lack of awareness of what individual's own employers actually do to sustainably managed claims-related waste.

The insurance profession can overcome these challenges through working together and with customers and policy makers. Through trialling waste-avoidance measures, gathering data, and educating people on the benefits of landfill-avoidance, insurers can establish best practices, identify areas requiring regulatory and financial support, and help quantify their sustainability goals. There may be some short-term pain, but there is long-term gain to be had, and it is clear on a grander scale that the cost of inaction is far greater than continuing as we are.

Definitions

“Claims-related waste”

Whilst ‘waste’ is commonly used in insurance to refer to leakage, for the purposes of this paper ‘claims-related waste’ refers to the physical materials generated/discarded as a result of a Retail Motor or Home insurance claim.

Examples of waste include, but are not limited to:

Retail Motor Insurance	Home Insurance
Vehicle parts	Plasterboard
Vehicle salvage	Furniture
Glass	Electronics
	Clothing

“Sustainability/Sustainable”

The common definition of sustainability refers to the use of resources in a way that can continue without running out. Within the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Sustainable Insurance (PSI), sustainable insurance is defined as a strategic approach where all activities in the insurance value chain, including interactions with stakeholders, are done in a responsible and forward-looking way by identifying, assessing, managing and monitoring risks and opportunities associated with environmental, social and governance issues.

Though for this paper when we use the term ‘sustainable’, we will be focussing predominantly on the environmental issues. When we talk of ‘sustainability’ and ‘sustainable’ solutions, we are referring to approaches or outcomes which result in landfill avoidance and circularity of material-use.

“Landfill Avoidance”

Methods of processing / dealing with waste by means other than sending it to landfill. This includes repairing, recycling, reusing, and incineration. For the purposes of this paper, we will not be considering incineration as a sustainable technique.

“Circular”/“Circularity”

Where materials are kept in use for longer via repairing, refurbishing, re-using, and recycling them. This contrasts with ‘linear’ material use where materials are used and then discarded, requiring virgin materials to be used to create new items.

“Beyond Economic Repair”/“BER”

Where an item is repairable but it would cost more to repair it than to replace it, or repairing it would exceed its pre-accident value.

“Scope 3 Emissions”

Indirect greenhouse gas emissions present in a company’s supply chain (that aren’t included in Scope 2.) This can include goods, transportation, and waste generated in operations.

Introduction

UK landfill waste covers an area equivalent to the size of over 145k football pitches². The insurance industry contributes to this through its processing of £46m worth of Motor and Property insurance claims every day, involving replacing products, repairing vehicles, and maintaining properties³. For example, there are approximately 700,000 Home insurance claims annually in the UK which we estimate produce enough waste to fill Wembley Stadium over 600 times a year. This Paper will therefore explore what the industry is doing to divert claims-related waste from landfill in Home and Retail Motor lines of business.

“Our global material footprint has more than tripled since 1979... waste has also significantly increased.” *The United Nations*⁴

Prevention

If you can't prevent, then...

Prepare for reuse

If you can't prepare for reuse, then...

Recycle

If you can't recycle, then...

Recover other value (e.g) energy

If you can't recover value, then...

Disposal

Landfill if no other
alternative available

Figure 1

Through dealing with claims, insurers play a key part in the waste hierarchy (Figure 1⁵) By wielding its considerable influence, the industry can support the supply chain in guiding waste towards sustainable outcomes. Of course, the success of the 're-use' and 'recycling' stages depends on infrastructure which may often fall outside of the direct influence of the insurance industry. We believe that there is opportunity to collaborate with other industries, such as the Waste & Recycling sector, to maximise sustainable outcomes. It is through this dialogue and cross-industry knowledge-sharing that necessary improvements to infrastructure can be highlighted to the Government.

Regarding landfill avoidance, we will be specifically considering repair, re-use, and recycling of materials. These are central tenants to the Circular Economy, which aims to keep materials in use for longer rather than managing them linearly. It is estimated that only 8.6% of the global economy is circular⁶, resulting in extraordinarily unsustainable levels of raw material usage. In the UK, 60% of businesses believe that the Circular Economy is important⁷ and yet in some areas recycling rates are falling and waste-incineration rates are rising⁸. Clearly action is needed at a national and global level to address unsustainability in waste management. On its current trajectory, the UK's Circular Economy will directly impact insurers, meaning implementation of sustainable waste handling methods will be brought to the foreground in due time. Considerations of material circularity will of course compliment Scope 3 emissions reporting, which means engaging with the supply chain to improve sustainability will become inevitable.

"We need a bigger shift to an economic system that encourages repair, reuse, and innovation, where resources are used again and again..." – Steve Reed MP, then Environment Secretary⁹

It is clear the trend on environmental matters is towards increased regulation and expectations, and that 'Greenwashing' will become a thing of the past¹⁰. We therefore echo the ABI in urging the industry to work together to improve waste handling methods¹¹, particularly regarding Home insurance claims. To this end, we will explore the barriers to improvement and offer potential solutions.

Waste reduction strategies

Law and policy making

The Regulatory Framework

There are a number of laws, regulations, and schemes governing waste disposal in the UK, such as:

- **Environmental Protection Act 1990¹²**: Imposes a Duty of Care on those who produce, import, keep, treat, or dispose of waste to ensure it is dealt with in accordance with the relevant rules
- **Landfill Tax 1996¹³**: A financial deterrent for biodegradable or potentially recyclable materials being sent to landfill
- **Landfill (England & Wales) Regulations (SI 1559) 2002¹⁴**: Restricts what waste can be sent to landfill and specifies minimum standards for monitoring the environmental impact of landfill waste
- **Hazardous Waste Regulations 2005¹⁵**: Introduces requirements for the safe handling, storing, transporting, and disposing of hazardous materials in order to protect human health and the environment
- **Waste (England & Wales) Regulations 2011¹⁶**: Confirms the 'waste hierarchy' of Prevention, Preparing for Re-Use, Recycling, Recovery, and Disposal
- **Waste Electrical and Electronic Equipment (WEEE) Regulations 2013¹⁷**: Establishes the producer responsibility system and introduces requirements regarding collection, treatment, and recycling of electronic household waste
- **End-of-Life Vehicle Regulations 2014¹⁸**: Imposes a legal duty on vehicle manufacturers and importers regarding recycling and recovery of ELVs
- **UK Plastics Pact 2018¹⁹**: A collation of companies, NGOs, and the Government with the aim to make all plastic packaging recyclable, re-usable, or compostable by the end of 2025
- **'Waste Duty of Care' Code of Practice 2018²⁰**: Provides guidance on compliance with the Duty of Care with non/compliance being admissible evidence in court
- **Environment Act 2021²¹**: Establishes the Office for Environmental Protection and introduces Extended Producer Responsibility and waste management targets
- **'Right to Repair' 2021²²**: Introduces a requirement for certain product parts and repair information to be available 7-10 years after manufacture
- **Waste and Resources Action Programme (WRAP)²³**: Introduces measures to improve resource efficiency through waste prevention / recycling
- **Construction and Demolition Waste Management Protocols²⁴**: Introduces rules on segregation of waste in the C&D industry
- **Digital Waste Tracking Service²⁵**: Effective from October 2026, some waste operators will be required to log all waste handled by them in a bid to tackle illegal waste handling

Overarching Policy

Net Zero

The UK has committed to achieving 'net zero' by 2050, meaning that greenhouse gas (GHG) emissions would equal the amount removed from the atmosphere. Materials decomposing in landfill produce GHG emissions and the production of new, replacement materials accounts for 45% of global carbon emissions²⁶. By reducing waste and extending product lifecycles GHG emissions can be reduced.

Circular Economy

This supports the UK's Net Zero strategy by promoting material re-use and reduction in overextraction of raw materials. Central to the Circular Economy is the UK's waste hierarchy, which prioritises Prevention, Re-Use, Recycling, and Recovery before Disposal.

Considerations for insurers

Claims

- Policyholders need to understand cover limitations should they dispose of waste improperly and be found liable for environmental damage e.g. exclusions where waste is disposed of negligently or illegally
- For companies involved in waste disposal, proper record keeping (e.g. of Waste Transfer Notes) will be necessary

Underwriting

- Insurers will likely assess waste disposal practices when considering the risk
- Promoting environmentally responsible practices may reduce long-term liability and insurance costs

Reputational / Regulatory Risk

- Failure to dispose of waste correctly could result in unlimited fines, legal action, and reputational damage
- Encouraging and educating policyholders regarding waste disposal requirements will align with the insurer's corporate responsibility

Successes from Environmental Regulation

Motor Industry

- Improvement in recycling rates, with greater focus on recovery and reusing
- Innovation e.g. development of remanufactured parts / use of Green Parts
- Extended vehicle lifecycles and improved waste prevention

Construction and Property Repairs

- Deconstruction practices leading to more sustainable building dismantling, maximising re-use of materials e.g. bricks, timber, metals
- Increased use of reclaimed materials in new property developments
- Waste reduction through circular material use, leading to reduced embodied carbon (total greenhouse gas emissions associated with the lifecycle of a building)

Household Items

- More re-use and repair initiatives and networks, extending product lifecycles

Government and Industry Collaboration

- Multiple actors working together on an issue to maximise the impact of any measures taken e.g. UK Plastics Pact
- Development of sustainable alternatives and improvements in waste-prevention
- £10b investment in the Waste & Recycling sector expected over the next decade²⁷

Retail motor insurance

Private motor insurance is the most significant compulsory insurance in the UK²⁸. With approximately 41.4m vehicles on the road²⁹ motor insurers deal with significant claims volumes each year, with claims-related waste being generated via vehicle repairs and the BER process.

Fortunately, motor insurance benefits from a well-established supply chain which enables insurers to effectively and sustainably deal with claims-related waste. Not only are there tens of thousands of businesses involved in vehicle repair and maintenance in the UK but there are also member networks which allow for maximised coverage and capacity when repairing, salvaging, and recycling vehicles. Even where vehicles are written-off, useable parts can be salvaged for use as “Green parts” instead of being sent to landfill – a trend which boomed during the supply chain disruption caused by COVID-19 and which continues to this day. Vehicle and parts salvaging not only leads to sustainable outcomes but also generates financial benefits for insurers and salvage agents alike through the sale of those vehicles and parts.

Green Parts

These are second-hand, Original Equipment (OE) parts which have been recovered from vehicles at the end of the vehicle’s useful life e.g. where they are written-off. Even when a vehicle is a total loss it will have many intact and undamaged parts which can be salvaged, pass the necessary safety checks, and be re-used.

The benefits of Green parts include:

- Financial savings - they are often available at a discounted rate compared to new components
- Waste-reduction – a reduced number of usable parts unnecessarily end up in landfill
- Shortened claims lifecycles - using them can speed up the time it takes to complete a vehicle repair as they may be more readily available than a new part

Some examples of how insurers are incorporating Green parts into their operations include³⁰:

- Nichido Fire has long encouraged repair and use of Green parts where possible, even offering a 10% discount on motor insurance if recycled parts are used
- RSA prioritises ‘repair over replace’, including promoting windscreen glass repair rather than replacement
- Allianz partnered with Synetiq to create a Green parts platform for sourcing parts, and uses Green parts automatically (for non-safety-critical repairs on fleet policies, where excess reduction and warranty incentives are also used³¹).

Turning to the supply chain, some examples of successes in vehicle salvage and recycling are:

Case Study 1 - Copart³²

A self-described “fundamentally green business”, Copart is a global industry leader in the used vehicle and salvage market. They operate vehicle auctions with a mind to reduce harm to the environment by keeping vehicles and parts in use for longer, listing 14,000 vehicles for sale each day. In their 24/25 financial year alone they recycled and/or repurposed a staggering 522,000 vehicles – the equivalent of planting 311 million trees or avoiding 6.53 million transatlantic flights. In 2022, Copart acquired the “Green Parts Specialists” to provide recycled vehicle parts and contribute to the firm’s wider sustainability efforts and Circular Economy initiatives. So far, over 450,000 vehicle parts have been recycled through Green parts specialists in the UK.

Copart also holds a Platinum Accreditation for their Carbon Literacy programme and are routinely audited by the Environment Agency to ensure compliance with Government targets. As part of their drive to embed sustainability in their operations, 50% of their Board members having experience in ESG matters and their ESG Committee meeting bi-monthly.

Case Study 2 - Charles Trent³³

One of the UK’s leading vehicle recycling experts, Charles Trent processes 30,000 vehicles annually and recycle 96% of each and every vehicle they process. They hold the ISO14001 accreditation (Environmental Management System), being continuously monitored to ensure they are identifying and mitigating environmental risks, reducing resource consumption, and fostering a culture of eco-responsibility.

Charles Trent have continued to invest and develop their business since their establishment almost 100 years ago, recently installing electric vehicle dismantling equipment (2021) and launching a business-to-business Green parts portal (2025.) Through this portal they are able to provide instant access to a database of 100,000 quality assured parts which are available for next day delivery (helping to keep claim lifecycles down.) They sell approximately 150,000 parts annually and offer a 10% discount on Green parts for vehicles purchased through them.

Case Study 3 - Synetiq³⁴

Another key player in the vehicle dismantling and recycling industry, Synetiq provides integrated salvage solutions, online salvage auctions, non-safety-critical Green parts supply, and software solutions to their customers. They have worked to integrate sustainability into their operations, achieving Gold status in the Carbon Literacy Project and ISO14001 accreditation. As well, 50% of their workforce have completed a Carbon Literacy training course to understand climate change and how humans impact upon it.

In 2024, Synetiq exceeded the EU End-of-Life Vehicle (ELV) recycling targets, achieving a recycling rate of 96.1% on each and every ELV (even down to copper wiring and tyre rubber.) On average, they extract over 5000 tonnes of aluminium from recycling vehicles each year and in 2023 alone saved 4.65m KGs of CO2 through the supply of Green parts. Each part is fully traceable with VIN matching and a Certificate of Conformity to ensure quality.

Case Study 4 - e2e³⁵

Re-launched in 2019, e2e is a Members network of independent salvage and vehicle recycling companies in the UK aiming to minimise environmental impact of ELVs through repair, re-use, and recycling. Each year, e2e Members process 300,000 vehicles and provide access to over 500,000 quality-graded and warranty-assured parts. To be a Member, companies must commit to e2e's ESG requirements, including carbon reduction targets, and comply with the Vehicle Recycler's Association Standards on Reused Parts.

Through its decontaminating, dismantling, and depolluting activities the network is able to recycle, on average, 95% of each and every vehicle:

- 99.5% of metal is recycled
- Fuel is extracted and sold to refiners for re-use
- Tyres are sold part-worn or recycled (used for fuel, shredded for playground surfaces, or re-used in road surfacing)
- Battery cases are recycled into pellets for new cases or vehicle bumpers
- Sulphuric acid in batteries is recovered to be made into gypsum

Despite a multitude of waste-reduction successes in Motor, BER practices remain a challenge to opting to repair as the primary claims outcome in all cases. Whilst salvaging vehicles is good for sustaining Green parts, it can indirectly have a negative environmental impact through new vehicle manufacture (to replace recycled vehicles) and carbon emissions from the salvaging and recycling activities themselves.

Of course, the solution to this problem is not necessarily straight-forward given that the designation 'beyond economic repair' is heavily influenced by the strength of the second-hand vehicle market. Where second-hand prices are high, vehicles are less likely to be written-off on grounds of economics - but prices have been volatile since the pandemic (though show some signs of recovering in 2025³⁶.) The ongoing drive in the UK towards sustainability and circular business models may well influence insurers to reconsider their thresholds for economic write-offs, though for the time being we can be satisfied that the supply chain can provide strong support to insurers to ensure maximised sustainable vehicle processing where a vehicle is a total loss.

Home insurance

Home insurance, by nature, generates significant volumes of claims-related waste. After all, fires, floods, and other types of Home claims will lead to a certain level of irreparably damaged materials that need to be disposed of. Dealing with this waste will involve various suppliers (such as waste removal companies, contractors, and restoration companies) who will organise disposal, including to landfill or incineration.

Though a certain level of landfill waste will be unavoidable, the Home insurance market is fortunately increasingly employing sustainability measures to prevent or better handle claims-related waste, as well as to track the carbon cost of traditional and sustainable repair / replacement methods.

Build Back Better

This scheme, created and partially funded by FloodRe, supports insurers in offering policyholders up to £10,000 to improve flood resiliency in their homes to mitigate damage from potential future flood claims. Over 60% of the UK's residential property insurance market supports the scheme, including Ageas, Aviva, Covea, Hiscox, NFU, LV, and RSA³⁷.

Flood resilient measures can include flood barriers and doors, installation of flood resilient flooring e.g. tiles, and flood resistant kitchens which are less susceptible to water damage.

Repeat flood catastrophes are on the rise but by accepting that they will happen and by investing in flood resilience as a claims outcome, insurers can potentially reduce their future claim spend and reduce the amount of waste generated by these future claims.

Sedgwick Carbon Calculator

Launched in January 2025, this Calculator allows Sedgwick's contractor network to track carbon emissions through the lifecycle of a project. Calculating the carbon emissions can be done either through arranging repairs via Sedgwick's repair solutions' system or through client-specific systems (where Sedgwick can apply their methodology to calculate the relevant carbon emissions.) These emissions can then be accurately offset through purchase of high-quality carbon credits, making Sedgwick the first carbon-neutral network in its field³⁸.

Sedgwick Damage Management Consultants

Sedgwick introduced this role to support sustainable repair practices following a property damage claim. These Consultants are specialist building surveyors who focus on planning building repairs in an environmentally responsible way by prioritising re-use of materials, minimisation of property strip-out, reduction in waste going to landfill, and use of low-carbon, sustainable building options. By leveraging specialist knowledge in restoration techniques, energy-efficient drying systems, and resilient building repairs, the Consultants can integrate sustainability into recovery plans from the outset.

The Consultants also offer guidance to insurers and adjusters to help them identify cost-effective methods to reduce the environmental and carbon impact of claims at an early stage, assisting insurers in meeting their ambitious net-zero targets.

Eco-Design ‘Right to Repair’ regulations

These Regulations aim to encourage repair of damaged appliances in order to reduce electronic waste. They stipulate minimum periods of time that repair information and spare parts must be available to professional repairers for certain goods, including:

- Washing machines
- Dishwashers
- Fridges, and
- TVs³⁹.

Whilst a positive example of Government engagement on the issue of waste reduction, the intended benefit of the Regulations may be stifled somewhat by the fact white goods are often cheap so replacement may be the more economic option in any case.

Despite the growing engagement with sustainable waste handling approaches there are still barriers to improvement in this line of business. We believe the key ones to Home insurance to be:

- Reliance on BER settlements
- Decline of salvage, and
- Rise of ‘landfill avoidance’ suppliers.

Reliance on BER settlements

In property claims, it is routine for handlers to agree replacement of goods, building strip-out, and cash settlements as alternatives to repair / restoration. These behaviours are, at least partly, driven by years of focus on customer service, economic settlements, and acceptable outcomes. Whilst these are important factors to consider they lead to lack of appreciation by insurers, and particularly by the front-lines in Claims, for the volumes of landfill waste being generated by Home claims.

Many items deemed BER can in fact be repaired, restored, recycled, or donated as an alternative to landfill. If the insurance profession wants to demonstrate a genuine commitment to sustainability then we must increase accountability in the use of BER and factor in the environmental cost when considering claims’ outcomes. For example, instead of a cash settlement for water / smoke damaged clothing, insurers could prioritise encouraging policyholders to agree to laundering clothing to prevent it ending up in landfill. Whilst this may carry a slightly higher financial cost, insurers could quantify the environmental saving (e.g. carbon-emissions avoided) of landfill-avoidance to demonstrate their commitment to sustainability. As well, by prioritising repair / restoration in Claims, the profession could have a positive impact on encouraging policyholder sustainability in other aspects of their lives to reduce waste in general.

“Business doesn’t just respond to consumer demand, financial markets, regulatory and policy environments – it also plays a role in shaping them.” – **World Business Council for Sustainable Development**⁴⁰

Decline of salvage

The decline of salvage in the UK Home insurance market has occurred due to economic, environmental, and operational factors that have reshaped how insurers manage property claims. As repair costs rise, the economic viability of salvaging damaged property diminishes. Often, the cost of restoring or repurposing materials exceeds their residual value which, as we know, leads to the use of BER settlements.

Further, salvage traditionally involved recovering usable materials or components from damaged properties. However, market demand for second-hand building materials has declined, partly due to stricter building regulations and quality standards. We must also consider that there is a degree of mis-trust of materials of unknown origin or compromised integrity, leading to reduced demand.

As well, insurers are increasingly adopting digital claims processing and predictive analytics to streamline claims handling. Whilst there are obvious benefits to insurers and customers of doing this, there is a corresponding reduction in emphasis on physical asset recovery and rise in claims-related waste.

Rise of 'Landfill Avoidance' Suppliers

Many waste removal suppliers advertise that they 'recycle' waste and 'divert 95%+ of waste away from landfill'. Whilst this sounds impressive, there is a lack of clarity around what specific landfill avoidance measures are being employed - there is a risk that waste is being diverted to incineration or being converted into Refuse Derived Fuel. People may reasonably consider that landfill avoidance measures are used to be 'more environmentally friendly.' If so, then the carbon-emission impacts of incineration and RDF seems at odds with the underlying sustainability aspirations. In fact, incineration is considered the 'dirtiest' form of power in the UK⁴¹ and RDF can contain significant degrees of plastic meaning burning it produces significant carbon emissions⁴².

With Scope 3 emissions reporting on the horizon, insurers will need to satisfy themselves as to exactly what their suppliers are doing with waste and what 'landfill avoidance' means in practice. Increased accountability of insurers, and transparency of the supply chain, would go some way to ensuring that sustainable landfill avoidance methods (e.g. repair, recycling, re-using, restoration, donation) are prioritised.

Despite some successes in Home and a growing movement towards sustainable outcomes, there is clearly still work to be done to improve waste avoidance in Home claims. This will include increasing industry accountability in not merely paying lip-service to 'sustainability', but implementing clear and comprehensive waste-avoidance strategies with measurable outcomes.

Challenges and opportunities

Alongside barriers specific to certain lines of business, through our research we explored broader challenges the profession faces in increasing sustainability in handling claims-related waste.

Financial cost

The indemnity principle is a cornerstone of the industry and places financial cost at the forefront of decision-making in Claims. This influences insurers to select the most cost-effective outcomes, a strategy that minimises claim spend and protects their business model to enable competitive premiums for customers. In a soft market, insurers must maintain low premiums to retain policyholders, meaning that cost control is essential.

Whilst 60% of UK businesses agree that the circular economy is important, 36% cite financial cost as the primary obstacle to adopting more sustainable practices⁴³. In the context of property repairs, sustainable materials like bamboo, hempcrete, and recycled steel often carry an upfront cost of 2% - 20% more compared to traditional material choices. They may also carry higher labour costs due to the need for specialised techniques.

“...we also need to shift our mindsets...about how we can operate regeneratively, rather than destructively – so that we can generate long-term value, and therefore future success.” - **World Business Council for Sustainable Development**⁴⁴

However, sustainable outcomes also carry financial benefits for both insurers and insureds, such as:

- For every £1 spent on installing flood defences, £8 of economic damage from a future flood event could be avoided (along with avoidance of waste creation)
- For every £1 spent on maintaining flood defences, £7 of economic damage could be avoided⁴⁵
- On average, sustainable buildings cost 14% less to operate due to improve energy efficiency, reduced water usage, and lower maintenance needs

Additional financial benefits may be capable of being unlocked but this is unknown due to a lack of data-gathering on the cost to an insurer of traditional vs non-traditional waste handling in Claims. This issue is compounded by implementation of landfill avoidance as a primary claims solution not being done en masse, meaning that any available data likely has gaps and is not necessarily representative of the true cost of landfill avoidance alternatives.

Similarly, there may be sustainability gaps in insurers' supply chains which may be difficult or expensive to overcome, particularly if an insurer does not own their supply chain. Reducing claims-related waste will of course require full buy-in from suppliers, particularly in light of Scope 3 emissions reporting. Claims and the supply chain need to work together to ensure that waste reduction strategies can be actioned accordingly, which means buy-in from all levels of an insurer is critical to ensure supplier agreements incorporate waste reduction strategies in the terms (preferably in a way that avoids burning waste as an alternative to landfill.) Overhauling or amending supply chain agreements to incorporate more sustainable waste handling may involve upfront costs, but this investment is essential for long-term environmental and financial resilience.

The insurance industry's rapid adoption of artificial intelligence (AI) offers a compelling parallel. Despite AI being an emerging field with uncertain benefits (and negative environmental impacts⁴⁶) 95% of insurers are already utilising AI technologies⁴⁷. This reflects the profession's strong appetite for innovation, especially technological advancement. In contrast, though waste reduction offers clear, measurable benefits it does not receive equivalent attention or investment. This disparity suggests a missed opportunity to apply the same strategic enthusiasm and resource allocation to sustainability as has been directed toward AI. Bearing in mind that no one seems to be arguing for *more* claims-related waste then landfill avoidance outcomes are surely an area the industry agrees is worthy of investment.

"Two trends are generally common in many insurance organisations—there is a desire to empower insurance professionals to make decisions, and to minimise the resource impact on the business due to additional new processes." – **Principles for Sustainable Insurance working group**⁴⁸.

Potential solutions

- Invest in sustainable practices, e.g. Resilient Reinstatement - insurers could reap long-term benefits by mitigating the risk of repeat property claims.
- Trial landfill avoidance solutions and track costs incurred / avoided so that quantitative data can be gathered to evidence the overall financial impact on insurers. This could aid understanding whether the cost of more expensive outcomes can be countered by cost-neutral / cost-saving outcomes.
- Consider how to build sustainability in policies and underwriting pricing strategy e.g. financial incentives upon renewal for customers who opt for landfill avoidance outcomes
- Work with the supply chain to strike deals with sustainably minded companies who already implement waste-avoidance measures, or else use industry influence and consideration of Scope 3 emissions to help amend existing agreements
- Lobby Government for financial incentives to support reducing waste and implementing circular business models in line with the Circular Economy e.g. zero-rating VAT on repairs
- Swallow the cost - perhaps a less popular option, though 75% of global investors would accept reduced ROI in order to invest in sustainable solutions⁴⁹.

The move towards ambitious carbon reduction targets and implementation of the Circular Economy shows no signs of slowing, meaning that landfill avoidance solutions will only become more of a priority. With growing demand and adoption comes lower costs, meaning financial cost will not be an insurmountable challenge forever. By implementing landfill avoidance outcomes now insurers can embed sustainability into claims handling, setting themselves up well for future regulation and helping landfill avoidance in claims to become the norm rather than the exception. Whilst the industry may have to carry an initial financial burden, the cost of doing nothing is far greater.

Employee empowerment

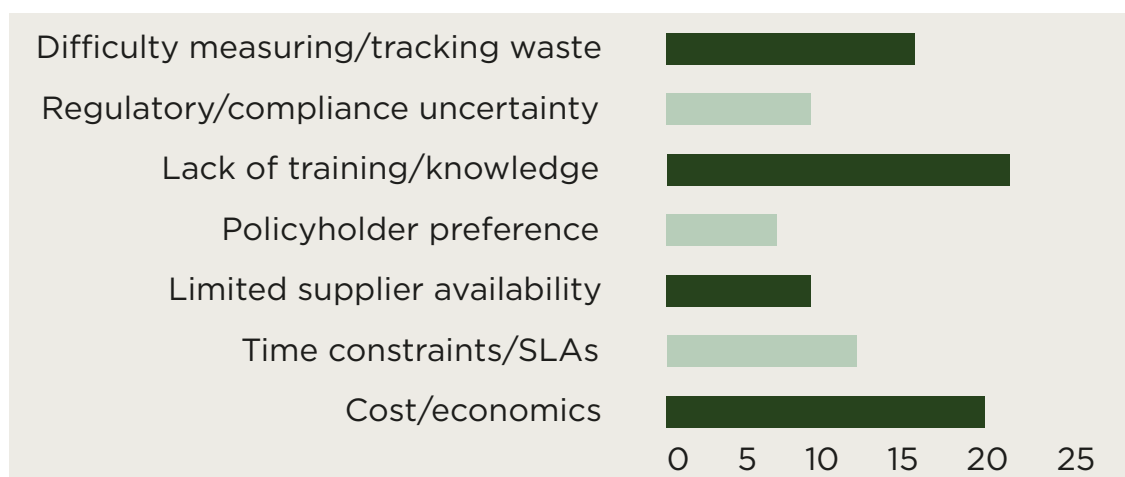
Despite evidence that insurance-related domestic building repairs in the UK have a carbon cost equivalent to driving a petrol car over 9,000 miles⁵⁰, comprehensive, empirical research into the environmental impact of insurance claims is almost non-existent. Due to this, we could not quantitatively investigate the scale of claims-related waste going to landfill even though there is vast amounts of press regarding insurers' Net Zero journeys. We did, however, conduct a qualitative survey of insurance professionals across all areas of the industry to better understand the impact of day-to-day decision making on waste in Claims.

The Survey

The questionnaire was split into three sections: 'About you & your organisation', 'Your company's approach' and 'Your behaviours & perceptions'. The questions were:

1. What is your primary role?
2. Which lines of business do you work in? (please tick all that apply)
3. Please select the number of UK employees of your company
4. To what extent do you agree with the statement "My employer's claims process is environmentally conscious"
5. Why did you answer this way? (optional)
6. Are you aware of your employer having taken steps to reduce landfill waste generated during the claims process?
7. Please describe any initiatives and results you're aware of (optional) E.g. sustainable suppliers, repair vs replace policies, donations, materials recycled, % or tonnes diverted, etc.
8. (For those in claims roles) When handling a claim, how often do you choose the more environmentally friendly option when it's available?
9. What do you see as the main barriers to reducing landfill waste within claims? (tick all that apply)
10. To what extent do you agree with the statement: "My company is doing enough to reduce landfill waste from claims."
11. What additional practices or methods would you like to see implemented? (optional) E.g. stronger repair vs replace guidance, supplier incentives, data dashboards...
12. Further comments (optional) Anything else you'd like to share about waste disposal in claims?

Barriers to reducing landfill waste claims were identified as being:



Full survey results can be found in Appendix 1.

Potential solutions

Some suggestions from employees for improvements in this area were:

- Being provided with more information on the options available to them to help reduce claims-related waste ending up in landfill e.g. repair, refurbishment, recycling, re-use, donations
- Organisations placing more emphasis on repair as a viable claims settlement option over replacement, and to empower employees to choose that option, and
- Greater use of second-hand markets

"I don't think it is clear what options are out there in terms of salvage options and recycling options on things like property claims. Focus is on quick and cost-effective settlements."

"More open information about what they are doing and the small changes we can make"

"I hadn't really considered the environmental impacts as a result of claims until this survey. That would suggest education around the issue needs to be a key factor in raising awareness, which may lead to insurers and adjusters considering alternative settlement options that are kinder to the environment. Having said that, claim settlement is dictated by economics, so any alternatives would need to be on a par from a cost perspective, or have buy in from all stake holders, with the understanding that increased costs will be incurred, but are justified by the reduced impact on the environment."

"Insurers specifying repair and env practice, making insured parties aware of these practices/preferences, educating it is not better to rip out and renew versus repairs considered a 'botch up job'"

Organisations must consider how they are translating initiatives created at a high-level into practical results on the ground. Having waste reduction strategies is the first step but there must be sufficient support to empower employees, particularly claims handlers, to be able to use these strategies. It is through consistent application of waste reduction initiatives, and data gathering, that insurers will be able to quantify the impact and benefits of landfill avoidance in Claims.

Customer behaviours

Unfortunately, we are seeing increased consumer fatigue towards sustainability initiatives. One industry consultant we spoke to believes that consumers are generally not considering sustainability when selecting insurance products.

Key barriers to consumer buy-in are commonly found to be price and value for money. Around half of consumers do not want to pay more up-front for sustainable products⁵¹ and significant numbers already shop around for cheaper Motor and Home insurance policies. This means simply raising premiums to finance waste-reduction strategies will not suffice, especially as there may be some consumer scepticism as to the benefit to them if they never make a claim. Even if a claim does result, consumers may resist a 'landfill avoidance outcome' which prolongs the claim and their inconvenience. Similarly, consumers may be reluctant to accept a repaired or refurbished product under a 'New for Old' policy as this may not chime with what they understand the policy coverage to provide.

Awareness of the issue of waste in claims is another barrier to changing views to galvanise support of sustainability measures. Most people we spoke to in the industry are simply not aware of or do not think about what happens to claims-related waste. Similarly, around 50% of consumers do not make more sustainable choices due to lack of information⁵². Though consumers already generally understand the importance of recycling and buying second-hand products, they need the profession's help to reconcile their personal sustainability aspirations with the way in which they buy financial products.

Even when consumers want to be engaged with sustainability initiatives they indicate that confusion around 'ESG terminology' makes it more difficult for them to make informed choices⁵³. Businesses, organisations, and countries all use ESG wording slightly differently, with there being no agreed upon definition – even the authors of this Report had to define our version of 'sustainability'.

Beyond the initial financial concerns there are other barriers to consumer interest in sustainability, such as confusion around non-standardised 'ESG terminology' and general mis-trust in repaired/recycled products.

How then can the insurance profession influence consumer thinking to remedy their concerns?

Potential solutions

- Educate consumers as to the scale of claims-related waste in the UK and the benefits to them of reducing this waste. Insurers *could* provide examples of what currently happens with waste and what could happen if landfill avoidance strategies were implemented.
- Obtain customer feedback on methods of information-sharing to ensure maximum engagement with educational materials. Consideration should also be given to when to impart information – pre-inception, post-inception, at renewal?
- Be more vocal around specific waste-reduction initiatives and successes to increase transparency (which around one third of consumers say would enhance their trust in an organisation⁵⁴.) Increased trust in insurers may help to decrease mis-trust in repaired / recycled items (which could also be tackled through warranties on products or future policy discounts upon renewal as a sustainability ‘reward’.)
- Consider cross-industry roundtables / discussions to understand how we all use ESG terminology to demystify wordings for consumers and establish some common definitions. To bolster credibility, and maximise reach and impact, industry could also engage with the Government on this issue.
- Consider offering future policy discounts (upon renewal) if a consumer opts for a ‘sustainable’ solution during the course of a claim, which may reducing waste as well as secure a renewal.

Worth noting as well is that more than 50% of younger people (18 – 24 YO) choose brands that have environmentally sustainable practices⁵⁵. This trend seems set to continue for the foreseeable future and could have a significant impact on insurers, particularly during these times of turbulence between the industry and climate campaigners. If insurers wish to secure interest from younger people, both in terms of buying products and working in the industry, we should work to position the profession as one where sustainability and waste-reduction is not merely paid lip-service but rather where we can demonstrate tangible results and a strong commitment to landfill avoidance strategies.

Perhaps most importantly, insurers should be mindful of not increasing the burden (financial or otherwise) on consumers. To do so would risk turning consumers away from waste reduction initiatives at a time where uptake of environmentally friendly solutions is flagging. Instead, the profession could use its considerable resources to help educate and guide consumers towards products that aim for sustainable outcomes, whilst ensuring good value for money and sufficient support in the event of a claim.

Knowledge Sharing

Through the UK’s Competition Law regime insurers face regulatory constraints around how they share information. The rules are designed to prevent anti-competitive behaviour and are primarily governed by the Competition Act 1998. Under this law, agreements between competitors that limit competition can be illegal, including those involving the exchange of commercially sensitive information such as pricing, strategy, or supplier details.

In the context of waste reduction in Claims, regulation may unintentionally stifle collaboration which would otherwise establish best practices. It is unclear whether information related to waste disposal suppliers or internal practices around categorising vehicles as ‘total loss’ or ‘repairable’ would be legally defined as ‘commercially sensitive’ so insurers may justifiably be cautious about sharing information in the absence of clear guidance. This uncertainty raises the question of whether current interpretations of competition law are limiting environmentally beneficial initiatives and whether such collaborations might qualify for an exemption under Competition Act 1998, s.9 (which allows for agreements that generate efficiency or consumer benefits.)

One example of insurers previously encountering regulatory challenges was the investigation by the Office of Fair Trading (OFT) into data-sharing practices linked to Experian’s WhatIf? Private Motor product. Following this investigation, the OFT determined that:

- Only data older than six months could be shared, and
- It must be fully anonymised, and
- It must be aggregated across a minimum of five firms⁵⁶.

Since this investigation, insurers appear to remain cautious about regulatory compliance. We contacted a number of companies for their input on this Report, but in most cases we did not receive a reply or else responses were non-specific to the organisation’s work. Whilst we cannot know the reasons why people did not reply to us, potential explanations could be concerns around of regulatory compliance, desire to maintain proprietary advantage, or simply a lack of interest or prioritisation of claims-related waste handling in organisations.

“The insurance industry is in a unique position to influence more sustainable decisions concerning property insurance claims and building repairs. However, more dialogue is needed between insurance companies, regulators and the construction industry...” - **Woodgate & Clark**⁵⁷.

A degree of reluctance in the industry and supply chain to engage with us may reinforce the challenges faced in promoting collaboration across the profession. Without greater openness and participation, efforts to reduce waste and improve sustainability in the claims process will remain fragmented and slow to progress, with innovation being stifled. This seems at odds with the ramping up of environmental regulation in the UK, particularly around carbon emissions reporting. There should arguably be a corresponding ramping up of clearly *identifiable and measurable* sustainability practices at all levels in the industry. Through implementing more waste avoidance initiatives and engaging in industry-level thematic reviews, insurers and their supply chain could identify policy challenges which need to be brought to the attention of government.

Potential solutions

- Use insurance industry bodies and associations to discuss waste reduction as a market theme, including celebrating successful strategies and practices (with data anonymised.)
- Engage with Government bodies, such as the Insurance and Financial Services All-Party Parliamentary Group, to explore regulatory amendments which would allow industries and supply chains to share data under controlled conditions e.g. through an anonymised, aggregated data-sharing platform.
- Lobby for financial incentives for companies who substantively engage in waste reduction initiatives to encourage wider uptake. This could include where companies contribute to data-sharing and establishing best practices in this area.
 - A successful model for this exists in Brazil where companies can deduct up to 1% of their income tax for investments in approved recycling projects, provided they meet the relevant eligibility criteria⁵⁸. A similar framework could be adapted in the UK to support insurers and suppliers in overcoming regulatory and commercial barriers to collaboration.
- Actively engage with information requests and consult with in-house legal teams to ensure data sharing to the fullest extent, as well as feedback to policymakers about any barriers to information sharing.

By aggregating knowledge of successful and unsuccessful landfill avoidance strategies we can tackle this issue at scale on an industry-wide level to ensure maximum impact. As well, wide-ranging collaboration could increase economic efficiency in this area, as initiatives which produce no benefits can be avoided and potentially increased demand for landfill avoidance solutions could begin to drive prices down.

Infrastructure and government intervention

As discussed, there is a well-developed legislative framework dealing with the handling of waste in the UK. A key development was the 1990 waste Duty of Care for organisations dealing with proper disposal of “controlled” (household, industrial, and commercial) waste⁵⁹. For the purposes of handing claims-related waste, insurers may engaged this Duty as ‘waste brokers’ (arranging waste transportation and management on behalf of another) or ‘waste managers’ (anyone involved in the collection, transport, recovery, or disposal of controlled waste.) Of course, if they organise a legitimate waste management service then insurers may easily discharge their Duty. It is also worth noting that there is no legal requirement to manage waste in a circular manner, though it is preferable to do so. This means the Duty alone may lack the necessary ‘teeth’ to influence better behaviours in Claims.

Further, the niche role of the profession in waste management is not specifically addressed by legislation. Instead, whilst there is a growing focus on material circularity at policy level, the focus is predominantly on municipal and agricultural waste handling e.g. plastic straws, food waste, plastic bags. Even within the profession arguably the primary ‘waste sustainability’ concerns for insurers relate more to (i) financial cost / savings and leakage, (ii) their own operational waste handling (e.g. office waste), and (iii) insuring ESG risks. This can lead to a ‘blind spot’ as to the volume of waste passing through Claims – as mentioned, most people we spoke to in the industry admit to having never considered what Claims does with its waste.

Even if we actively consider the role of the profession in waste handling the success of landfill-avoidance solutions also rests on other industries. If there are gaps in infrastructure then this is not something that insurers alone can resolve – we must work with other sectors, such as the Waste & Recycling industry. For example, gypsum-based plaster waste can be difficult to dispose of sustainably as it must be segregated from biodegradable waste and requires specialist contractors to recycle. Despite the fact that plasterboard can be recycled whether it actually is comes down to having the infrastructure to do so. In fact, it is estimated that 75% of all construction waste is not recycled or repurposed (though it could be) due to lack of integrated waste management frameworks⁶⁰. Though it is a positive step that the Government is investing £1.1b in local recycling services⁶¹, the focus again appears to be on addressing municipal / individual recycling rather than dealing with large waste handlers such as insurers. Where exactly claims-related waste fits into ‘local’ investment, and whether this investment will provide results with difficult to recycle materials (e.g. Lithium-Ion batteries and plaster) remains to be seen.

Potential solutions

- Insurers could mimic the reporting aspect of the incoming Digital Waste Tracking Service to log waste they deal with. This would allow them to better understand ‘what’ and ‘how much’ they are managing and to provide quantitative data to be acted upon. Insurers could utilise AI capabilities to semi/automate this process so handlers are not taken from front-line claims handling for admin tasks
- Use data to help address gaps in waste management and recycling infrastructure through identifying materials which are difficult to manage circularly, quantifying volumes of the same, and understanding where gaps in capacity lie in order to guide investment to key areas
- Lobby Government to advocate for policy and legislative reform to develop incentives for circular material management solutions, including financial incentives to aid development new technologies and support the industry in being able to divert claims-related waste from landfill
- Collaborate with other industries and charities to circulate useable, second-hand or salvaged items to divert them from landfill (e.g. through using or developing online second-hand marketplaces.) As mentioned, insurers could lobby Government for financial support to do this
- Continue to work across the industry to develop credentials, standards, and certifications which substantiate ‘green’ commitments and landfill avoidance at an operational level, and obtain buy-in from the Government, regulators, and professional bodies to lend legitimacy to them
- Actively engage with schemes and initiatives (e.g. WRAP, UK Plastics Pact, Automotive Recycling Group) to support and influence policies to improve reuse and recycling of materials, and to improve understanding of sustainable claims-handling amongst employees

What comes next?

As individuals:

- Consider what chances you have in your role to make more sustainable choices, and make those choices where possible
- Speak to your colleagues, including managers, about this Report and gain insight on what your employer is already doing to achieve sustainable claims outcomes
- Engage with 'sustainability-focussed' staff/roles to highlight any areas for improvement and gain knowledge on waste-reduction methods you may not be aware of

As organisations:

- Consider the training / support you offer employees to enable sustainable claims outcomes
- Use dedicated 'sustainability-focussed' staff/roles to embed sustainability ideals
- Engage with your supply chain to understand any barriers they may face and how they can be remedied
- Have a roundtable where all aspects of the business are represented (e.g. claims, underwriting, broking, C-suite) to discuss sustainable claims outcomes and what you can do as a business
- Take steps to understand what consumers want and understand when it comes to sustainability in policies

Conclusion

The insurance profession and its partners should be proud of their successes so far in sustainably handling claims-related waste. Motor is an area of real success, particularly with the proliferation of Green Parts usage and the consistent, 90%+ recycling of End-of-Life Vehicles (likely helping to offset the negative environmental impacts of BER settlements.)

However, there remains important work to be done to improve outcomes, particularly in Home insurance. Whilst the industry is incorporating more sustainable practices in property claims handling, in stark contrast to the Motor salvage industry there remains a notable gap in the salvage market for Home insurance. If the insurance profession is to demonstrate serious commitment to its ESG responsibilities, with quantifiable results, then moving to a circular model in dealing with claims-related waste is a must. As we have discussed, the challenges of doing so are not insurmountable and there are long-term financial and environmental benefits to be unlocked.

What we can do in the short-term is:

- Work openly together as a profession to exchange best practices,
- Empower employees to make sustainable decisions, including through trialling 'test cases' to see what do and do not work in practice,
- Educate consumers on the benefits of sustainable claims-outcomes to encourage uptake when claims occur, and
- Engage with policy makers to help support the industry in making more environmentally-friendly decisions, including through financial incentives.

Landfill-avoidance in Claims is a small cog in the sustainability machine, but a genuine way in which we can all make meaningful differences to improve sustainability in our sector. On an individual level you may think "what can I do?", but we must remember that every insurer is made up of individuals.

Working together we will shape a more sustainable future.

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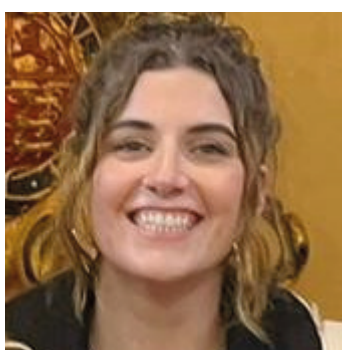
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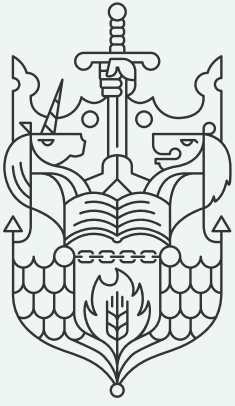
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 - Places a Duty of Care on anyone (barring domestic occupiers) who produces, imports, keeps, treats, or disposes of waste to ensure it is dealt with appropriately in accordance with the applicable rules when the waste moves from them to another waste holder
 - Requires waste to be stored, transported, and disposed of by an authorised company or person
 - Establishes custodial sentences and fines for illegal dumping, which the Act identifies as having potential to cause significant environmental damage.
13. [Landfill Tax](#): this was introduced as a financial deterrent for biodegradable or potentially recyclable materials being sent to landfill. If waste is ‘inert’ or ‘inactive’ (i.e. non-hazardous, and/or low potential for greenhouse gas emissions, and/or low polluting potential in landfill environments) the lower rate of £4.05/tonne is charged (as of April 2025.) This type of waste includes clay, slate, glass, silica, ash from wood burning, and uncontaminated gypsum. For all other ‘active’ waste, the higher rate of £126.15/tonne applies (as of April 2025.)
14. [The Landfill \(England and Wales\) Regulations 2002](#) SI 1559: these Regulations apply restrictions to waste which can be disposed of at landfill (e.g. bans corrosive substances and certain types of tyres) and specify minimum environmental monitoring criteria regarding acceptance of waste and volume / impact of leachate.
15. [The Hazardous Waste \(England and Wales\) Regulations 2005](#): these Regulations are intended to ensure the safe handling, storing, transporting, and disposing of hazardous materials in order to protect human health and the environment. The Regulations –
 - Define ‘hazardous waste’ by reference to the waste’s properties and potential to pose a risk to human health
 - Introduce requirements for special handling, storage, and disposal procedures for hazardous waste
 - Implement registration and licensing for waste carriers dealing with hazardous waste.

16. [The Waste \(England and Wales\) Regulations 2011](#): these Regulations apply to businesses that produce, import or export, carry or transport, keep or store, treat or dispose of waste. The Regulations –
 - Confirm the ‘waste hierarchy’ as Prevention, Preparing for Re-Use, Recycling, Recovery (incl. energy recover), and Disposal
 - Introduce Transfer Notes where waste is passed on to a new party, including declarations of whether hazardous waste is present and that the waste hierarchy has been considered
 - Mandate waste producers ensure waste is responsibly managed, with documentation in support of the same.
17. [The Waste Electrical and Electronic Equipment \(WEEE\) Regulations 2013](#): these Regulations impose responsibilities on businesses and consumers regarding the disposal and treatment of electronic waste in order to improve recycling of the same. The Regulations –
 - Introduce a responsibility on producers who place EEE on the market in the UK to finance responsible collection, treatment, recovery, and disposal of WEEE from private households during the applicable ‘compliance period’ (no such responsibility if WEEE is not from a private household)
 - Require any person collecting or transporting WEEE to comply with these Regulations must do so in a way to optimise reuse and recycling of the same
 - Require producers to join a scheme for the duration of the compliance period and keep proper records of amount of EEE placed on the market
 - Place responsibilities on consumers e.g. to not dispose of WEEE in regular household bins or to return WEEE to retailers when buying new equivalent EEE
18. [End-of-Life Vehicle Regulations 2014](#): these Regulations impose a legal duty on vehicle manufacturers and vehicle importers regarding recycling and recovery of ELVs to ensure, through targets, the responsible re-use, recycling, and recovery of ELV components. This includes ensuring proper depollution through removing hazardous fluids and components (e.g. batteries, fuel, oil, coolant, chemicals) and recovering valuable materials to reduce environmental impact of continued vehicle manufacture.
19. [WRAP’s UK Plastics Pact](#): a Pact between an array of companies, NGOs, and the Government, it has the aim to make all plastic packaging recyclable, re-usable, or compostable by the end of 2025. This includes eliminating problematic plastics from the value chain, and stimulating innovation and investment in plastics recycling. Moving beyond 2025, WRAP “is working with members and partners to shape the next phase of action - a new voluntary agreement that builds on what we’ve learned and expands our focus beyond plastics to drive system-wide change across all packaging.
20. ‘Waste Duty of Care’ Code of Practice 2018: the Code provides guidance on compliance with the statutory Duty of Care for handling waste, and has statutory status itself. Non/compliance with the Code is admissible evidence in court, notwithstanding that the primary duty is to comply with the Duty of Care itself. The Code applies to ‘waste holders’ who are classified as –
 - Waste producers: anyone whose activities produce waste, including operations which change the nature and composition of waste
 - Waste carriers: anyone who collects, carries, or transports waste for the purposes of business
 - Waste dealers: anyone who buys waste with the aim of selling it, even if they do not take possession of it
 - Waste brokers: anyone that arranges waste transportation and management on behalf of another
 - Waste managers: anyone involved in the collection, transport, recovery, or disposal of controlled waste (that being any household, industrial, or commercial waste)
21. [Environment Act 2021](#): this Act is intended to improve environmental in the UK by

updating the legal framework post-Brexit. The Act –

- Establishes the Office for Environmental Protection whose prime function is to contribute to environmental protection and improvement of the natural environment, including via enforcement action
 - Introduces Extended Producer Responsibility and empowers the Secretary of State to require producers to contribute financially to the disposing of products and materials
 - Requires the Secretary of State to set a long-term target in respect of at least one matter relating to air quality, water, biodiversity, and resource efficient & waste reduction
 - Empowers to Secretary of State to make Regulations regarding e.g. digital waste tracking and charges for single use items
22. [Ecodesign for Energy-Related Products and Energy Information Regulations 2021 \('Right to Repair'\)](#): this 'right' applies to certain categories of products (including white goods.) There is a legal requirement that spare parts be manufactured and available for a period of 7-10 years, as well as maintenance and repair information to be available to professional repairers. Unfortunately, it is somewhat limited in its application (e.g. does not apply to cookers, hobs, microwaves, or household technology like smart speakers, phones, and laptops.) It is also worth noting that goods it does apply to may have a design-life of much longer than the statutory period, potentially leading to total replacements in any case.
23. [The Waste and Resources Action Programme](#): through funding provided via the Environmental Improvement Plan 2023, WRAP funding of approximately £9m has been used to improve resource efficiency and waste minimisation through prevention and recycling. The WRAP Programme has introduced restrictions on single use plastics (e.g. straws, cotton buds, and drink stirrers) and additional tax on plastics that do not contain at least 30% recycled plastic. The Programme also introduced new powers to combat waste crimes, such as fly-tipping and irresponsible disposal of waste.
24. [Construction and Demolition Waste Management Protocol 2024](#) (EU); [Construction and Demolition Waste Classification 2025](#) (DEFRA): these Protocols introduce rules on segregation of waste in the C&D industry, including separation of concrete, bricks, timber, metals, and plastics. The aim is to achieve 100% re-use or recycling of recoverable materials, the rate of which has improved due to modular construction and deconstruction and salvage of building components (as oppose to complete demolition.)
25. [Digital Waste Tracking Service 2026](#); [Digital Waste Tracking Service consultation response](#): this service aims to improve waste tracking to tackle illegal waste handling and environmental crimes. The data will also be used to confirm who is actively dealing with waste handling.
- From October 2026, the initial phase will require waste receiving sites (those holding a permit or licence to receive waste) to record details of all waste received
 - There will be some exemptions from the Service e.g.
 - Household Waste Recycling Centres (HWRCs) - other than if the waste is commercial waste
 - Householders who take waste to a HWRC themselves
 - Litter picking, including where done by a local authority
 - Incidental waste i.e. waste generated and moved by people not specifically carrying out a waste management service (e.g. tradespeople)
 - In order to prevent fly-tipping, household waste collection by third parties will fall into the Service.
 - From April 2027, the Service will be expanded to other operators (details TBC)

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