

Consistency in Household and Business Recycling Collections in England

Response to Defra consultation by Wildlife and Countryside Link

May 2019

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 52 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This response is supported by the following Link members:

- A Rocha UK
- Bat Conservation Trust
- British Canoeing
- British Mountaineering Council
- Born Free Foundation
- Butterfly Conservation
- Campaign to Protect Rural England
- ClientEarth
- Environmental Investigation Agency
- Friends of the Earth England, Wales and Northern Ireland
- Greenpeace
- Institute of Fisheries Management
- Marine Conservation Society
- Salmon and Trout Conservation
- Whale and Dolphin Conservation
- Wildlife Gardening Forum
- Wild Justice
- The Wildlife Trusts
- WWF
- Zoological Society of London (ZSL)

Wildlife and Countryside Link is working in partnership with:

- Green Alliance
- Keep Britain Tidy
- Surfers Against Sewage

EXECUTIVE SUMMARY

The UK Government's recent declaration of a climate emergency and the Committee on Climate Change's new 'Net Zero' report show that the tide is turning, with major environmental crises no longer being ignored at the highest level. If the UK Government is to prove that these are more than hollow words, it must focus on addressing major environmental problems at root. In the case of the single-use packaging crisis, we must build a system focused on packaging waste prevention, with a wholesale transition to re-usable alternatives and closed-loop recycling.

The environment sector welcomes the long overdue and timely attention to resources, and the opportunity to address the shortcomings of a packaging system regarded as inefficient at best and broken at worst. We are gratified that the Government recognises that a major overhaul is needed and plans to properly embed concepts such as the polluter pays principle and extended producer responsibility in UK packaging legislation.

At the same time, we believe improvements are still needed. It remains unclear how the warm words on waste minimisation and resource efficiency in the Resources and Waste strategy will translate into action on the ground. Questions remain about whether the consultations' proposals will add up to a coherent, sustainable system.

In examining the four consultations¹, we have noticed several recurring shortcomings. These are:

- **Reduction is too often ignored:** We cannot recycle our way out of the current packaging crisis, which requires a reduction-led strategy to phase out all non-essential, single-use packaging and a transition to a refillable, reusable society. We believe the Government must do much more to first prevent waste generation and reduce harm, as dictated by the waste hierarchy. An obvious place to start would be to set legally binding reduction targets.
- **It is not just about plastic:** All materials have environmental consequences and we need to revolutionise the packaging system as a whole rather than focusing on substituting one single-use material for another. We believe, for example, that the implementation of a tax on plastic, rather than all materials, could lead to perverse shifts to avoid the tax, with negative environmental consequences. Likewise, a Deposit Return Scheme (DRS) should include all materials to prevent all forms of litter and ensure all drinks containers are properly collected so material can be used again.
- **Government policy must address the unchecked introduction of non-conventional plastics:** We are particularly concerned that the reforms will not prevent like-for-like substitutions with biodegradable, bio-based and compostable plastics. These plastics do not solve the problems associated with pollution in marine, terrestrial and aquatic environments, and we should not be searching to create material that is safe to litter. Their rise could justify greater use of single-use plastic packaging and so detract from the need to reduce, while also complicating existing collection and recycling systems.
- **All the UK Governments and Government departments must work together:** There is inconsistency across UK Governments and Government departments that is proving extremely unhelpful and could risk the effectiveness of all proposed schemes. For example, given the current political context and lack of legislative mechanisms, the plastic packaging tax must extend to Northern Ireland or risk it becoming a dumping ground for the industry to sell off remaining stocks of plastic products. Any DRS in England, Wales and Northern Ireland must also match the criteria and timelines of the Scottish scheme. In England specifically, we are concerned that the Department for Business, Energy and Industrial Strategy (BEIS) has been promoting bio-based and compostable plastics as a solution to the marine plastic crisis, at the same time as Defra's consultations suggest they should be avoided. Unlike other recent Government strategies in England, including the Clean Growth Strategy and the Industrial Strategy, the foreword for the Resources and Waste strategy was from the Environment Secretary, and not the Prime Minister. We worry that this signals a lack of buy-in from other departments to some of the contents of the strategy and resulting consultations.
- **Behaviour change is not guaranteed:** The overhauls rightly aim to fairly and effectively distribute responsibility, but there is little to encourage people to do the right thing, apart from through the proposed DRS. Charging for single-use cups, for instance, which is being explored in Scotland, is still disappointingly absent in the rest of the UK. The extended producer responsibility (EPR) reforms will also see producers paying to landfill recyclable waste if people choose not to recycle it. This is clearly a shortcoming, and indicates the need to reopen the discussions on variable charging. This is a common feature in many societies with low waste generation and high recycling. Consulting on this now is the best way to lay the groundwork for introduction once all citizens have access to high quality, consistent services.

DETAILED RESPONSE

Consultation questions on dry recycling

Proposal 1

We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

¹ As well as this consultation on Extended Producer Responsibility, the UK Government is consulting on a tax on plastic packaging, a Deposit Return Scheme (for England and Wales) and consistency in household and business recycling collection (for England).

5. Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

We agree with the proposal of a requirement for local authorities to collect a core set of dry recyclable materials for recycling.

6. We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

We agree with the proposal for all local authorities to collect the set of core materials for recycling. While local authorities manage different mixes of urban, suburban and rural environments, we see no reason why these differences should preclude collection of a core set of materials.

7. What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

Outside of major urban centres, only a small proportion of the population in England live in flats or Houses in multiple occupancy (HMOs). This may dissuade Local Authorities from providing targeted and relevant recycling provision and support, when recycling performance can be more easily improved from semi-detached and detached dwellings with space for storage of dedicated recycling storage units.

Indeed, we contend that space for storage of boxes, bins or bags combined with ease of access will continue to be the primary issues to be overcome in driving up recycling performance in flats and HMOs.

We suggest that government works with the Local Government Association (LGA) and Local Association of Recycling Officers (LARAC) to identify good practice in provision of collection systems in these circumstances and use this as the basis for guidance and setting of minimum collection standards. In addition, we suggest that all new-build developments of houses and flats should be legally required to have adequate provision for recycling facilities, making appropriate storage and ease of access a key requirement. The Ministry for Housing, Communities and Local Government (MHCLG) should seek to incorporate this requirement into the Building Regulations and Planning Legislation.

8. What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

To support our proposal for all new build houses and flats to incorporate adequate provision for recycling, there are a number of studies in London looking at the introduction of recycling facilities in new builds within London². Resource London and Peabody Trust are also working together on a project running until March 2020 exploring how sustainable waste management solutions can be

² https://www.london.gov.uk/sites/default/files/57_waste_in_tall_buildings_2018.pdf

designed into new build flats and how recycling can be improved in existing flats³. WRAP have also carried out a number of studies on recycling in flats which outline useful ideas for how these proposals could apply to HMOs^{4,5}.

9. Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

We support the move towards a harmonised recycling service as part of a wider suite of measures to promote resource efficiency and bring about the wholesale transition to replace our existing throwaway culture with a reusable, refillable society.

We believe that site specific issues related to flats, HMOs and other high density housing should not be used as a rationale to abandon development of a national harmonised service. Instead, they should prompt innovation in service design together with targeted exemptions allowing different collection systems where evidence is provided that separate collection clearly cannot be made to work.

Proposal 2

We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

10. Do you believe that all of these core materials should be included or any excluded?

All of the core materials should be included.

	This should be included in the core set	This should be excluded in the core set	Not sure/don't have an opinion/ not applicable
Glass bottles and containers	✓		
Paper and card	✓		
Plastic bottles	✓		
Plastic pots tubs and trays	✓		
Steel and aluminium tins and cans	✓		

³ <https://resourcelondon.org/what-we-do/innovation-and-development/flats-recycling-project/>

⁴ <http://www.wrap.org.uk/sites/files/wrap/Recycling%20for%20flats%20March%202006%20WW%20Defra.pdf>

⁵ <http://www.wrap.org.uk/content/recycling-collections-flats-introduction>

11. What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start for consistency	This should be included in the core set from the start for consistency	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	✓			
Plastic bags and films	✓			
Other materials	✓			

12. If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

Food and drinks cartons

We contend that food cartons should be included, as these are becoming increasingly common in the household waste stream, with over 60,000 tonnes (of food and drink cartons) manufactured for the UK market⁶.

Within the EU, industry self-reports that 48% of cartons are recycled⁷. However, no figures are available for the UK, despite a rise in the number of available recycling points for cartons⁸.

We believe that drinks cartons should be incorporated into the proposed Deposit Return Scheme (DRS), in which case a substantial proportion of drinks cartons would transfer from kerbside collection to the DRS. However, providing for collection of food cartons at kerbside would additionally allow householders to place drinks cartons in kerbside collection for recycling if they chose not to reclaim the deposit, ensuring they are indeed recycled and not deposited in residual waste.

Plastic bags and films

414,000 tonnes of consumer plastic packaging film arises every year⁹, but these materials are difficult to recycle, at least without chemical recycling which we do not condone. Therefore, producer fees through the EPR scheme should be used to encourage simplification of the polymers to enable closed loop recycling and phase out non-recyclable materials.

Any recyclable plastic bags and film remaining should be considered for inclusion in the core set of materials and collected separately, to enable recycling, prevent them from contaminating other waste streams and avoid them getting caught in and damaging machinery at Materials Recycling Facilities (MRFs).

Other materials

⁶ http://www.ace-uk.co.uk/images/uploads/Recycling_beverage_cartons_in_the_UK.pdf

⁷ <http://www.ace-uk.co.uk/media-centre/news/eu-beverage-carton-recycling-rate-rises-for-12th-consecutive-year/>

⁸ <http://ace-uk.co.uk/recycling/where-can-i-recycle>

⁹ http://www.wrap.org.uk/sites/files/wrap/Plastics_Market_Situation_Report.pdf

Clean aluminium foil and aerosols should be included in the core set of materials, not just tins and cans.

Consideration must also be given to other plastic polymers not currently recycled such as thermoset plastics, particularly if evidence suggests they are increasing in residual waste arisings.

13. If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Options should be explored for national collection and reprocessing of LDPE polymers, creating an effective end market for secondary material.

14. Do you have any other comments to make about Proposal 2?

The consultation as drafted refers to the core set of materials for collection in terms of their use for packaging. However, many other household products can present as waste, such as damaged Tupperware containers and other small plastic household items, including toys. There is currently no guidance or legislation governing the ease with which other products can be recycled. At the current time it is likely that these may be incorrectly placed in an inappropriate household recycling container, placed in household residual waste bins or taken to a Household Waste Recycling Centre (HWRC).

Defra should consider the options for product design and materials choice to widen the scope of materials that can be captured and effectively recycled as part of a developing circular economy, either at the kerbside or at a HWRC.

Proposal 3

We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that a) evidence supports the benefits, b) there are viable processing technologies for proposed materials, c) there are sustainable end markets, d) local authorities would not be adversely affected, including financially.

15. Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

We agree with this measure, which is particularly relevant given the changes that are likely to come to packaging materials and quantities with increased online purchasing.

16. Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

Yes – but I would also add some.

It would also be helpful to include another condition focused on closed loop recycling. The potential for modulated fees under the current proposals for Extended Producer Responsibility should drive

increasing use of materials capable of closed loop recycling. If a material is suggested for kerbside collection and recycling but can only be open loop recycled then Defra should review why this material is being used in quantities that require separate kerbside collection. Simultaneously, they should explore why EPR is not being effective in encouraging use of different packaging materials that can be closed loop recycled, before engaging in a change of the collection systems.

We contend that any review of the core set of materials should be undertaken by an independent body acting on best available evidence. Recommendations from this body should then be acted on by Defra within an agreed timescale.

17. Do you have any other comments to make about Proposal 3?

In terms of the proposed conditions for adding a core material, there is potential for a ‘chicken and egg’ scenario. If sustainable end markets are required under condition ‘c’, these may in fact be dependent on a regular and clean source of material being available in the first instance.

Therefore, consideration should be given to the ability to ‘develop’ sustainable end markets and not just the presence of existing sustainable end markets. Indeed, Defra’s remit should extend to actively stimulating and encouraging development of new sustainable end markets through legislation, policy and/or economic incentives.

Proposals for separate food waste collection

Proposal 4

By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

18. Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree
(i) At least a weekly collection of food waste	✓	
(ii) A separate collection of food waste (i.e. not mixed with garden waste)	✓	
(iii) Services to be changed only as and when contracts allow		✓
(iv) Providing free caddy liners to householders for food waste bins	✓	

19. Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

We contend that a separate food waste collection should be provided to flats particularly with increasing numbers of high rise residential buildings being constructed¹⁰.

¹⁰ <https://buildingproducts.co.uk/uk-sees-increase-number-high-rise-buildings/>

Within flats there are a number of options for collection of food waste and these should be fully explored and options for implementation developed¹¹.

It has been shown in places like Milan that it is possible to offer food waste collections to areas with a high concentration of flats or HMOs. Milan has more than a million inhabitants, with a population density higher than 7,000 people per square kilometre, and with more than 80 per cent of households part of HMOs. As of 2014, all these residents and businesses had access to a food waste collection service, resulting in 130,000 tonnes of food waste per year being diverted from landfill, and saving 8,760 tonnes of CO₂ a year, according to the Italian Composting and Biogas Consortium¹².

20. Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

We are unclear why a transition to weekly, separate food waste collections would only be undertaken when contracts allow. This may result in delays of many years in some instances where Local Authorities have recently entered into long term outsourced service contracts. Defra should model and factor in the additional costs associated with breaking contracts or enacting break clauses. This additional cost may be insignificant when set against the costs of the entire national service provision.

Indeed, evidence shows that councils can save £10-20 per household a year by moving from a weekly to a fortnightly residual waste collection complemented by a weekly food waste service. Where collection is already fortnightly, this isn't the case, although the Renewable Energy Association has argued that adding a separate food waste collection would allow councils to reduce collection frequency further, which would cut collection costs and increase recycle income¹³.

We strongly suggest that in advance of this legislation, Defra identifies councils whose contracts are running out with a view to preventing council entering into new long term contracts that do not meet the intended outcomes of the consultation. Options may include short term extension to existing contracts or entering into new contracts where the contracted service delivery can be readily reviewed and adapted without compensation payment and where any significant changes to service delivery are phased in once new requirements become legally binding.

In particular, those who are coming to the end of contracts now should be encouraged to separate their food waste and councils that currently collect food waste should not be allowed to stop offering this service. To facilitate increased service provision, Defra may wish to find a way to incentivise local authorities (whose contracts are expiring prior to the legislation being introduced) to incorporate segregated food waste into their kerbside collection.

In addition, many Local Authorities have now taken waste collection services back in-house and these authorities should be prioritised for early action, given there will be no contractual issues or costs, beyond those costs actually required for service transition and harmonisation.

¹¹ <http://www.wrap.org.uk/content/recycling-collections-flats-food-waste-collections>

¹² http://www.renewablematter.eu/partners/cic/cic%20annual_report2015eng.pdf

¹³ https://www.r-e-a.net/resources/pdf/244/REA_Report_On_Separate_Biowaste_Collections_19-05-2016.pdf

We contend that the use of compostable caddy liners for the separate collection of food waste is one of the few instances where we would support use of compostable film and packaging as a tool to improve separate collection and to prevent organic material from going in with residual waste.

The use of a liner for food waste caddies is important in promoting collection of food waste¹⁴.

It is an increasing trend for councils to encourage residents to use conventional plastic bags with food waste collection, in line with what happens in many areas in Europe. In most instances, food waste collected this way goes to anaerobic digestion (AD) plants with primary screens that de-package the food waste and collect the bags for disposal in landfill or incineration. However, this is not an ideal system, as it results in unnecessary contamination in the food waste stream and sends the wrong message to residents about mixing conventional plastic with organic waste. Instead, certified biodegradable bags should be used as a tool to improve both collection and the treatment process. Biodegradable bags are already successfully accepted in all plants in Italy, Catalunya (Spain) and sites across Germany and Sweden.

We would like to see Defra work with and incentivise the AD industry to scale up the addition of composting to existing AD plants as an additional step after the anaerobic digestion process and for new AD plants to be developed with an additional composting process, as happens commonly in places like Italy¹⁵.

This additional step is already required in some parts of Europe where digestate is considered a waste product unless it is composted. Following suit would allow compostable bags to be more effectively used as, if they survive the quick anaerobic digestion process, they will be effectively dealt with in the composting stage. Moreover, this additional process results in a more stable and less polluting product that can be more widely used as a fertilizer¹⁶. Composting digestate should prevent the loss of nitrogen and help deal with concerns about air pollution during the spreading of digestate, as highlighted in the government's Clean Air Strategy¹⁷.

We believe that the use of compostable or biodegradable bags should only be considered in these type of segregated collection and treatment systems. Wider use in plastic packaging must be avoided, to prevent contamination of the waste stream, a potential increase in waste discarded to landfill or incineration and the risk of poorer quality secondary material.

Proposal 5

We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

21. If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection?

¹⁴ <http://www.wrap.org.uk/content/guide-assist-ad-operators-accept-food-waste-liners>

¹⁵ http://www.renewablematter.eu/partners/cic/cic%20annual_report2015eng.pdf

¹⁶ <https://resource.co/article/systematic-shift-9974>

¹⁷ <https://www.gov.uk/government/publications/clean-air-strategy-2019>

We are not responding on behalf of a local authority

22. Do you have any other comments to make about Proposal 5?

We believe that AD plants are an effective way of dealing with food waste that has not already been re-purposed for human or animal consumption in line with the food waste hierarchy.

We also contend that there is real scope for AD plants to be adapted or improved with an additional composting stage. This will improve the quality of the resulting fertiliser replacement, allow for better use of compostable caddy liners and provide a higher quality product.

We have concerns around an over reliance on the existing AD and composting industry's ability to develop the necessary infrastructure in strategic locations. The existing incentives framework has been diminished and does not incentivise the development of a new generation of co-located AD and composting plants. Therefore we believe that Defra should work with HM Treasury and the National Infrastructure Commission to consider how best to develop a strategic plan for upscaling AD and composting facilities across the country. During this process consideration will need to be given to councils who have already implemented schemes at cost to local tax payers and how any system of incentives for new development doesn't penalise these early adopters.

Proposal 6

We believe it would be desirable for local authorities that have contractual commitments with IVC facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

23. What are your views on this proposal?

We do not support this proposal. Defra's preferred treatment method for food waste is AD, as outlined in the statutory guidance on dealing with surplus and waste in relation to the food and drink waste hierarchy¹⁸.

The Anaerobic Digestion Strategy and Action Plan (2011) also states that AD is the best environmental option for food waste¹⁹.

We contend that the benefits of composting alone are minimal in comparison.

Any continuation of treatment of mixed food waste and garden waste by composting should be time-limited while efforts are made to not only separately collect food and garden waste but to provide the most effective treatment options. For food waste collections we consider AD followed

¹⁸ <https://www.gov.uk/government/publications/food-and-drink-waste-hierarchy-deal-with-surplus-and-waste/food-and-drink-waste-hierarchy-deal-with-surplus-and-waste>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69400/anaerobic-digestion-strat-action-plan.pdf

by composting would provide a low carbon treatment option producing high quality fertiliser. For garden waste, home composting should be encouraged as the primary mechanism for treatment with an option for ‘paid for’ separate collection and windrowing as a secondary option.

Proposals for collecting garden waste

Proposal 7

We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision

24. Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree
(i) a free garden waste collection for all households with gardens		✓
(ii) A capacity to 240l (bin or other container eg sack)		✓
(iii) A fortnightly collection frequency (available at least through the growing season)		✓
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement		✓
(v) this new requirement to start from 2023 (subject to funding and waste contracts)		✓

25. Do you have any other comments to make about Proposal 7?

We do not agree with the proposal to provide a free garden waste collection service to all households. This proposal would unfairly benefit wealthier households whilst flats and less wealthy households with a small garden or no garden would in effect be subsidising the service.

We contend that Defra’s first priority should be to promote and enable home composting of garden waste, with some local authorities having previously provided compost bins to householders free of charge. In lieu of providing a free service Defra could consider the wider provision of compost bins and communication of composting good practice, which would also support a message that householders must begin taking more responsibility for the waste they produce.

Where householders do want a garden waste collection service, then local authorities should be able to provide such a service but at a charge to the householder. Indeed, research suggests that over half of local authorities have already implemented charging schemes²⁰.

²⁰ <https://www.bbc.co.uk/news/uk-44594105>

The consultation document acknowledges that one of the perverse outcomes of weight based targets has been the drive to collect more garden waste. We therefore should not be encouraging a process already identified as perverse.

Proposals on improving quality by source separating dry recycling materials

Proposal 8

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this and will include guidance in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

26. Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

We agree with the proposed approach.

27. What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

We have previously outlined some of the potential issues in our responses to questions 7, 8 and 9.

Lack of space for storage of the containers required to facilitate separate collection is a key issue to address, but this can be overcome with use of stackable boxes or other containers, which take up the same space as traditional wheeled bins²¹.

In addition, the ease of collection will be critical. Where householders are required to use communal systems for separate collection these should be as 'near-home' as possible with options for door to door collection also being considered.

The demand to prove that a separate waste collection system is not technically, environmentally and economically (TEEP) feasible will need to be more rigorously assessed in future. This should include more stringent guidelines on TEEP compliant circumstances and more opportunity for innovation in service delivery to avoid the use of TEEP in all but the most exceptional circumstances.

28. Do you have any other comments to make about Proposal 8?

We have no additional comments to make

²¹ https://binsdirect.com/recycling-at-home/kerbside-recycling/3-box-stack-3boxstack?gclid=Ci0KCQjws5HIBRDIARIsAOomqA2JpRgU9sGv_GFbLnUFc5XxZWMofboa-zBsYM6UNyr36RU-IW8GMksaAtDsEALw_wcB

Proposals for bin colour standardisation

Proposal 9

Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

29. Do you agree or disagree with this proposal?

We agree with the proposal to standardise bin colours for all waste streams

30. There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

On page 37 of the consultation document, WRAP estimates the cost to replace the entire bin stock across England with new colour coded bins is between £290 and £317 million. Therefore, we agree that the phased approach 2 makes economic and environmental sense.

In the meantime, we suggest that coloured stickers could be used on existing bags, bins or boxes to provide a mechanism for moving towards greater uniformity while the phased transition to a new colour system for containers is implemented.

31. Do you have any other comments to make about Proposal 9?

We have no additional comments to make.

Proposals on setting standards for household waste recycling services

Proposal 10

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

32. Do you agree or disagree with the proposal to publish statutory guidance?

We agree that the government should publish statutory guidance, however, we would welcome clarification on the status of such guidance and whether it would be legally enforceable. We contend that it should be enforceable through an independent organisation, such as the proposed Office for Environmental Protection.

33. We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

We agree with this proposal.

34. Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week

We strongly disagree with this proposal.

Evidence exists demonstrating that improvements to recycling occur when access to residual waste collections is restricted through reduced frequency of collection. This evidence has been gathered through schemes in Denbighshire²² and Conwy²³ in Wales and is reported by environmental experts, isonomia²⁴.

Improvements to recycling can also be achieved by reducing residual waste container volume. Indeed WRAP report that²⁵ *'Each additional litre of effective weekly residual containment capacity was associated with a reduction in mean recycling rate of 0.06±0.02 percentage points. This indicates that authorities with higher effective weekly residual containment capacity were associated with lower recycling rates. Comparing 240 litres effective weekly residual containment capacity (typical for a weekly residual collection) with a reference value of 120 litres a week (typically seen with a fortnightly residual collection), is therefore predicted to reduce recycling rate by 7.2±2.9 percentage points.'*

Mandating the frequency of residual waste collection will actively prevent the achievement of improved rates of recycling, which may be improved through reduced frequency of collection, reduced residual waste capacity or a combination of the two. Proposals for a weekly food waste collection service should also reduce residual waste and enable less frequent residual waste collection.

35. Do you have any other comments to make about Proposal 10?

We believe that Local Authorities should achieve full net-cost EPR funding, when they evidence that they have met the minimum performance standards.

Proposals on communicating about recycling

Proposal 11

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

36. Do you have any comments to make about Proposal 11?

We broadly agree with this approach although the vague nature of the question makes it difficult to provide any additional insight or comment, without additional information.

²² <https://collectionsblueprint.wales/case-study/smaller-bins-denbighshire>

²³ <http://www.conwy.gov.uk/en/Resident/Recycling-and-Waste/4-Weekly-Refuse-Collections-Boost-Recycling-across-Conwy.aspx>

²⁴ <https://www.isonomia.co.uk/great-expectations-predicted-and-real-results-of-3-weekly-collections/>

²⁵ <http://www.wrap.org.uk/sites/files/wrap/WRAP-analysis-recycling-performance-2012-13.pdf>

37. What information do householders and members of the public need to help them recycle better?

We contend that the move to greater consistency is critical, as at the moment we are communicating a complex message and this is clearly proving challenging, given reported levels of public confusion²⁶ and the stalled national household waste recycling rate.

We suggest that WRAP should seek to work alongside a specialist behaviour change organisation to develop a segmentation model and good quality messaging, with a robust mechanism for evaluation of outcomes and impact. This should be timed to coincide with the introduction of the new harmonised services.

Proposal 12

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

38. Do you agree or disagree with this proposal?

We agree with the proposal that government should work with local authorities and other stakeholders on improving transparency of information to householders on the end destination for household recycling.

39. Do you have any other comments to make about Proposal 12?

Welsh Government has already made a commitment on this and reporting on the end destination of waste collected by local authorities²⁷.

Defra should seek advice from Welsh Government in implementing this reporting.

Proposals on end markets

40. Please use this space to briefly explain any comments you have on the issues discussed in this section.

The recent National Infrastructure Committee (NIC) report was silent on the opportunity for strategic development of UK based recycling and re-processing infrastructure²⁸. We believe this was a clear oversight.

We contend that Defra should not rely solely on the market, but given the kick-start provided by the four aligned consultations on EPR, DRS, recycling consistency and Plastic Tax, should clearly steer investment opportunities to sectors and geographical locations that make strategic sense.

²⁶ <https://blog.viridor.co.uk/wp-content/uploads/2018/09/Viridor-UK-Recycling-Index-2018.pdf>

²⁷ https://gov.wales/topics/environmentcountryside/epq/waste_recycling/publication/?lang=en

²⁸ <https://www.nic.org.uk/publications/national-infrastructure-assessment-2018/>

Proposals on non-binding performance indicators

Proposal 14

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to deliver higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

41. Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

We are unclear what purpose non-binding statutory targets would achieve and any targets relating to waste should focus on reduction in the first instance.

Individual Local Authority recycling performance is already reported annually and we have no evidence to suggest this encourages improvements in performance. We therefore encourage the reporting of the wider indicators, in particular yield, which will help in monitoring waste prevention efforts. However, in the absence of any Local Authority specific targets or sanctions, we are unclear how reporting of these indicators would significantly influence performance.

42. Do you agree or disagree that the proposed indicators are appropriate?

We believe that the proposed indicators are relevant. However, we would also like to see additional indicators included to cover rates of reduction, contamination or rejection. These will be important in determining the success of recycling messages on changing householder recycling behaviour and reducing waste overall.

43. Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

We contend that while information on garden waste collection and recycling will be important to collect, it should continue to be reported separately from overall Local Authority recycling figures.

Weight based recycling targets can be distorted by high quantities of garden waste, especially if it is a wet year, which we believe artificially inflates reported recycling figures.

If the proposed indicators are to be a truer reflection of changing consumption, our improved management of natural resources and a transfer from a linear to a more circular economy, then waste reporting should reflect the reductions achieved as well as purchasing decisions we make. To achieve this, they should not be distorted by the addition of garden waste, which is a useful metric in its own right, but not when combined with other waste arising data.

We want to see key indicators enshrined as statutory targets, which will incentivise Local Authorities to drive improvements in performance. Targets could be set to reflect categories of Local Authority, potentially split by urban, sub-urban and rural, with benchmarks of good performance set within each category and challenging targets set accordingly. This would further allow comparison of like with like performance and encourage greater sharing of good practice and innovation within each of the categories.

Defra may want to consider whether any incentives could be developed to reward good performance, in particular where a Local Authority significantly over-performs, as a result of investment or innovation in their service provision.

Proposals on alternatives to weight-based metrics

Proposal 15

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

44. Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

We agree that alternative standards should be developed.

45. Do you agree that these alternatives should sit alongside current weight-based metrics

We agree that these alternative standards should sit alongside the current weight-based metrics and not replace them.

46. What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

We want to see a system of carbon metrics developed for each individual waste stream collected, which will be reported alongside the weight based targets. Creating a carbon equivalent metric will provide greater insight into the environmental impact associated with each waste stream and a fairer reflection of its true value, particularly for lightweight material such as plastic. The carbon equivalent metric should be reported on waste arising and waste recycled to allow greater emphasis to be placed on waste prevention in addition to waste collected for recycling.

Consideration could also be given to other societal and economic based metrics, potentially including the likely proportion of waste collected that can be processed in the UK and employment created, although this should not negatively influence development of technology and improvements to automated processing of waste for recycling and reprocessing.

Proposals on joint working

Proposal 16

We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

47. Do you agree that greater partnership working between authorities could lead to improved waste management and higher levels of recycling?

We agree that greater partnership working is critical to improved waste management and higher levels of recycling. Development and sharing of good practice between local authorities, particularly those facing similar geographical or demographic challenges will be critical. In particular, there will need to be a greater emphasis on partnership between upper and lower tier authorities, where the relationship between Waste Collection Authority (WCA) and Waste Disposal Authority (WDA) can dis-incentivise greater recycling performance, particularly if recycling credits paid by the WDA to the WCA are removed for certain waste types or reduced.

48. What are the key barriers to greater partnership working?

We believe the key barriers relate to the two tier system between upper and lower tier authorities, where recycling credits can influence or dis-incentivise waste reduction and greater recycling performance. In addition pre-existing contractual arrangements between WDA, WCA and contractor can also act as a barrier to improved performance, particularly in relation to waste minimisation when contracts require minimum waste tonnages to be delivered for treatment or disposal^{29, 30}.

While outside the scope of this consultation, serious consideration should be given to the future set-up of local government and administration in England. MHCLG should be encouraged to consider whether the current two-tier administration should be amended in favour of unitary authorities to bring us in line with Wales and Scotland. An approach supported by senior figures within a range of local authorities³¹.

49. How might government help overcome these barriers?

We want to see upper and lower tier authorities required to enter into formal waste partnerships, building on good practice elsewhere in the sector. Developing one body with overall responsibility for collection, recycling and disposal can create efficiencies, economies of scale and also improve performance.

The Somerset Waste Partnership estimates they save around £1.5 million every year by working collaboratively³².

²⁹ <https://bradford.moderngov.co.uk/documents/s17621/Env31OctDocJ.pdf>

³⁰ <https://procontract.due-north.com/ContractsRegister/ViewContractDetails?contractId=a9b25e12-303d-e711-80e1-005056b64545>

³¹ <https://www.adeptnet.org.uk/system/files/documents/Resources%20and%20Waste%20Policy.pdf>

³² <http://www.somerset.gov.uk/organisation/partnerships/somerset-waste-partnership/>

In addition, the development of indicators or targets for waste prevention as well as recycling will encourage contracts that do not mandate performance on waste collected, but on performance in preventing waste and improving recycling.

50. Do you have any other comments to make about Proposal 16?

We have no additional comments to make.

Proposals on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17

We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

51. Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

We agree with this proposal. We suggest it will help develop consistency of message and greater behaviour change, if individual behaviours are the same whether at home or in the workplace.

52. Which of the 3 options do you favour?

Option 3 mixed dry recycling, separate glass recycling, separate food recycling Something else (please expand ...)

Defra should consider introducing into businesses the exact same multi-stream system suggested for householders. We see no reason why businesses should not be encouraged to separate their waste to the same standard as that required of householders. Limitations on space or storage can be addressed through innovation in storage systems and joint procurement of services, with TEEP compliant exemptions for clearly evidenced cases such as micro-businesses.

Again, we suggest this level of consistency, will help develop consistency of message and greater behaviour change, if individual behaviours are the same whether at home or in the workplace.

53. We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons

We believe that limitations on space or storage can be addressed through innovation in storage systems with TEEP compliant exemptions only for clearly evidenced cases – such as micro-businesses.

54. Should some businesses, public sector premises or other organisations be exempt from the requirement? Yes (which ones and why ...?) No Not sure/no opinion/not applicable

We believe some businesses may need to be exempt for instance small kiosks in transport hubs. However, we further contend that limitations on space or storage can be addressed through innovation in storage systems and joint procurement of services, with TEEP compliant exemptions only for clearly evidenced cases – such as micro-businesses.

55. Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

We have no additional comments to make.

Proposal 18

Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

56. Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

We agree with this proposal.

57. Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

We agree with this proposal, subject to further analysis around setting minimum thresholds, and how this could be enforced, with sufficient oversight to encourage wide compliance.

58. Do you have any views on how we should define ‘sufficient’ in terms of businesses producing ‘sufficient’ quantities of food waste to be deemed in scope of the regulations?

A threshold could be determined based on weight and therefore equivalent container size and potential to fill the container on a weekly basis – to allow businesses to better estimate their food waste. Guidance from Zero Waste Scotland suggests a de-minimus of 5kg of food waste produced per week³³.

Businesses claiming an exemption could be subject to occasional residual waste composition analysis to determine that quantities of food waste are indeed below the de-minimus.

³³ <https://www.zerowastescotland.org.uk/sites/default/files/Food%20Waste%20Collections%20Contract%20Guidance.pdf>

59. Do you have any views on how we should define ‘food-producing’ businesses?

We believe that all businesses can potentially be defined as ‘food-producing’, given that even the smallest office has potential to create food waste.

60. In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement? Yes (which ones and why ...?)

We don’t see any reason to provide for further exemptions.

61. Do you have any other comments to make about proposal 18?

We have no further comments to make.

Proposal 19

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

62. What are your views on the options proposed to reduced costs?

We have no additional comments to make on the proposal, beyond the measures outlined in the consultation document.

63. Are there other ways to reduce the cost burden that we have overlooked?

We have no additional comments to make.

64. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

We suggest the use of clear and consistent messages, reinforcing the economic benefits that can accrue to businesses through reducing, reusing and recycling waste rather than paying for residual waste disposal.

In addition, the production and delivery of sector based workshops and tailored guidance would be useful both in encouraging businesses to transition to new services and also creating an element of peer challenge. Especially where other businesses in a sector have already transitioned and can outline the benefits to their peers – within workshops and through case studies.

Proposals on business waste data

Proposal 20

As part of implementing consistency, we will work with waste producers and waste waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

65. Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

We believe that there should be an onus on business to report their data. This could be aggregated for specific sectors.

66. Do you have any other comment on Proposal 20?

It would be useful to look at the waste statistics for the relative proportions of household-like waste originating from households and businesses (excluding construction and demolition waste). If business waste arising is substantial and proportionate to household, then there should be greater emphasis placed on implementing business waste recycling and enforcing the requirements.