



Briefing 19/24

June 2019

APSE Response to the Government consultation on Consistency in Household and Business Recycling Collections in England

- This briefing outlines the details of APSE's response to the Government's consultation on the *Consistency in Household and Business Recycling Collections in England* which is contained within the proposals for the Resources and Waste Strategy.
- The detail of the response was collated from comments received from APSE's network of Refuse, Recycling and Street Cleansing managers including a focus group held on 27 March 2019. The responses which are contained within the briefing note were submitted to Defra on 23 April 2019.
- APSE will continue to assess progress in delivering the strategy and inform its members accordingly.

Introduction

Following yearly increases in England's recycling rates, Government has become concerned that these increases have now begun to stagnate. They believe that a more consistent set of collection systems and materials collected, needs to be established in order to increase the amount of materials being recycled. This simplification by introducing greater consistency, would improve the quality of the materials placed out for collection by the public and businesses. Therefore by standardising the recycling collection process, then recycling rates will again begin to rise.

They have therefore put forward a series of proposals regarding *Consistency in Household and Business Recycling Collections in England* which they wish to consult on. It was these proposals which APSE's Refuse, Recycling and Street Cleansing network, including the focus group held on 27 March 2019, collectively developed a response to. The views of the group and network will be termed as '**the collective view**' during the course of this briefing note

Proposal 1 - Collecting a core set of core materials for recycling

There was a general consensus that the idea of establishing a core set of materials was a sensible approach and would be achievable by local authorities. However, when

considering collecting materials from flats or houses in multiple occupation, *'there would be a need to reconfigure the types of bins needed to allow the core set of materials to be collected, especially if as envisaged that more materials would be deposited for recycling as a result of a simpler system. Larger bins may require additional space which may be a problem in densely populated areas where space is at a premium. Also if certain materials currently collected are not included in the core set of materials, this may increase the amount of materials going into the residual waste bins requiring additional provision. There will be a need to inform and educate residents, as this will be a significant change to current waste collection systems'*.

Other points raised were included in the 'further comments section' and these included the belief that, *'due to the widely reported public confusion over what can be recycled, adopting a core set of materials will simplify the matter and should produce more and better quality recycled materials which would be more attractive to reprocessors. It should be noted however that even within core materials there will be a significant variation in material types so this would need to be clearly communicated when devising the collection system'*.

Proposal 2 – The core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pot tubs and trays, and steel and aluminium tins and cans.

The collective view was that that the core materials suggested were the correct choice of recyclable materials most commonly found in household and business waste streams. In addition to these materials the focus group also suggested the inclusion of food and drinks cartons and plastic bags and film.

Comments received also suggested that, *'as stated previously, because of variations in each type of core material, a clear communications campaign should be developed which has national uniformity and removes the ability to create hybrid systems as this will only add to the current confusion as to what can and can't be recycled. It has to be made clear that what is recycled in one area is the same across the country as a whole'*.

Proposal 3 – Regular reviewing of core materials and expanded over time on the assumption there are clear benefits, viable technologies to reprocess the new materials, sustainable end markets and local authorities were not adversely affected.

The collective view supported the proposals, but also felt that there would *'need to add the environmental impact of not collecting certain types of waste, as although there may be a question on end markets and availability of reprocessors it has been seen that certain waste such as batteries can have a harmful impact if not removed'*.

Proposal 4 – By 2023 legislate for local authorities to provide kerbside properties and flats to at least a weekly separate collection service for food waste, including provision of containers and liners.

The collective view was that this was technically possible and desirable but did highlight the need for the provision of suitable funding. There was also the point raised about the need for separate collections as opposed to mixing food waste with green waste as many

currently do. Therefore the general consensus was that separate weekly food waste was not the best option. *'Where there is a lack of space, particularly in and around flats where the concentration of food waste being stored prior to collection could present a health issue and possibly attract anti- social behaviour. As a large proportion of councils collect both food and garden waste in the same container the dilution of food waste within green waste would probably present less of an issue.'*

Regarding additional comments it was the collective view that, *'whilst we are promoting separate food and garden waste collections, the strategy does not seem to address increasing the amount of home composting, which would to a large extent remove some of the pressures on added weekly collections for local authorities'*.

Proposal 5 – Government will provide funding and support to help local authorities put the necessary collection infrastructures in place.

The consultation asked as to the type of issues the funding would support and collective view suggested, *'procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers), Communications support, (e.g. free collateral that can be adapted and used locally), Technical support, (e.g. free advice from a consultant about round re-profiling)'*

Other comments added to this proposal included, *'To bring about a greater consistency in recycling collections would obviously require considerable re-organisation of rounds and infrastructure (purchasing new containers etc.) as well as re-educating residents on new collection systems and materials they can recycle. For some this would also mean contract renegotiation and therefore it is not surprising all these items have been identified in the help and support required.'*

Proposal 6 – For those local authorities with mixed garden and food waste contracts with IVC's facilities to be able to still collect food waste separately and then re-mix it with garden waste for treatment purposes. This is suggested as evidence shows separate presentation and collection of food waste results in higher yields.

There was a clear division between Government thinking and the practitioners perspective as the collective view was that *'It is likely that although higher yields may be gained from separate collections, both public and local authority reaction would be that we are simply making the job twice as complicated, particularly when we intend to mix the two together at the end of the day. Perhaps therefore more emphasis should be laid on persuading greater levels of food recycling in general, however, this needs to be linked to a food waste prevention programme in the first instance'*.

Proposal 7 – Those households generating garden waste should be given access to a free collection service based on a 240 litre bin or sack, on a minimum of a fortnightly collection or more frequently if required which could be chargeable.

The collective view was that they agreed with this collection proposal, but also commented that, *'regards the ability to charge if more garden waste is produced over the set capacity, this should be balanced by offering free home composters/composting advice, and thereafter if still additional capacity is needed, a charge can be made'*

Proposal 8 – Apart from identifying core materials, there is the proposal to carry out separate collection of materials where this is feasible and can help improve quality. Government will produce statutory guidance on minimum service standards to help local authorities in decision making on separate collections.

The collective view was that they agreed with separate collections possibly improving quality but raised the point that, *'concerns were raised about the type of containers used especially separate collection boxes, as members noted that anti-social behaviour was a particular problem. Also space will be a concern if additional containers are needed to be placed out. There was also the view that public acceptability may be an issue as currently many have mixed recycling collections and to increase the work required to separate materials may not be popular'*.

Proposal 9 – Assuming a set of core materials is adopted, the proposal is put forward to have a standardised waste container colour for these materials together with residual waste, food and garden waste.

The collective view supported standardised colours as a good idea but should be phased in as contracts are renewed, however the ideal would be to have a *'start date as to when standardised bin colours are introduced, as allowing different areas to introduce standardised colours at different times will only add to public confusion, particularly if the communications campaign is to have any real effect, everyone need to have the same message at the same time and therefore the same bin colours'*.

Proposal 10 – Government will prepare statutory guidance on minimum service standards to which local authorities will have regard based on a consultation exercise.

There was general agreement re producing statutory guidance which should be reviewed every few years. However there was total disagreement with residual waste collections of at least every two weeks. The view was that, *'Ideally residual waste should be 3 weekly as to increase the frequency of collections (many local authorities are now considering/ have implemented three-weekly collections) will take some of the responsibility to recycle waste away from the householder. It should be made as difficult as possible to use the residual waste route to get rid of waste particularly as the aim of this strategy is to increase the amount and quality of recycle waste collected'*.

Proposal 11 – Government will continue to support Recycle Now and the tools provided by WRAP to help local authorities communicate more effectively about recycling.

The consensus was that, *'Perhaps there needs to be a re-branding of WRAP and Recycle Now, in particular, one which would have the authority to monitor and report progress of each local authority to identify best practice and innovation. There needs to be closer links with local authorities in developing standards and any future changes to ensure practicality and sustainability'*.

With regards to the type of information householders and members of the public need to recycle better, the collective view was, *'if the proposals contained within this consultation*

are adopted, then clear and simple information on the materials which can be recycled is important as is the proposed colour schemes for bins and containers. Prior to any introduction of new services there needs to be clear and sustained information as to why this new service approach is being adopted, what it hopes to achieve and then national messages on progress and successes. This latter fact will hopefully gain greater public support for what is another upheaval in the way we collect and treat waste'.

Proposal 12 – There will be greater transparency on the end destination for household recycling.

Everyone agreed that Government should work more closely with local authorities and other stakeholders on this issue. In particular members of the group felt that if, *'the Resources and Waste Strategy will be expecting a great deal of effort from local authorities and their residents to make it work as previously stated. Therefore there is a clear need that the public understands why they are making this extra effort but more importantly that it is making a difference. There has been many stories about waste being sent to landfill which people thought was being recycled. If we are to see significant improvements in the waste collected and its quality then the public needs to be sure it is being recycled'.*

Proposal 13 – For waste collection and recycling efforts to work there needs to be sustainable end markets. If consistent collections and minimum service standards are implemented there will be greater confidence amongst investors that there is a sustained supply of quality materials to enable them to deliver the required waste sorting and recycling infrastructure in the UK.

The following comment was provided, *'This was a particular concern at the recent APSE discussion group in that the locality of reprocessors was discussed. Having local or even regional reprocessors will be vital if there are outlets for the materials collected and obviously the proximity principle is a key factor in both the economic and environmental feasibility of having ready markets/outlets for the materials collected'.*

Proposal 14 – Government proposes to establish a set on non-binding performance indicators for local authorities to monitor waste management and recycling to highlight where service can be improved and recycling rates increased and waste minimised. As well as indicators covering the core materials there is a suggestion that indicators be added for garden waste and residual waste and possibly material quality and contamination levels and service delivery.

The collective view was that they agreed in principle with the intention but did comment that, *'The key issue here is that as they are non-binding, the importance placed upon them by local authorities may be different across the country. There is an element of competition re performance but this should be measured against the demographics and deprivation of each area so as not to penalise those who have the more difficult areas.*

Proposal 15 – Government is looking at new metrics to sit beside weight based metrics to adjudge performance

Members agreed with this proposal and also suggested two potential metrics:

- *Environmental metrics could include CO2 avoidance achieved by recycling a certain type of waste e.g. food and garden waste.*
- *Volume of plastic needs to be considered against actual weight, as many millions of plastic items could be recycled against very little tonnages achieved*

Proposal 16 – Government wants to support greater partnership working between authorities in the hope that it will improve waste management and achieve higher levels of recycling.

The collective view concurred with this proposal and stated that,

‘Certainly if collective tonnages were pooled then this guarantee of material would be far more attractive to reprocessing organisations locating in area with large and regular feedstocks. Also by sharing costs local authorities could develop internal reprocessing facilities such as IVC’s and MRF’s which from an individual local authority perspective may be too costly to develop on their own’.

Regarding barriers to partnership working, comments received from the focus group were,

- *Individual existing contracts with private sector organisations may preclude certain authorities from working in collaboration with neighbouring authorities.*
- *Political differences should not be a major problem but if this does occur Government may need to act as an intermediary to help develop and explain beneficial operational synergies.*

Proposal 17 – Government wishes to increase recycling from establishments that produce municipal waste by legislation so that such establishments would need to separate dry recyclable waste from residual waste for collection.

This collective view accepted the proposals on the proviso that there was no future consideration that suggested food waste would be collected.

There was also the issue of space for some businesses, *‘Issues may arise over space, particularly as businesses will be paying for any space they rent and as with the view that the additional recycling requirements should not be detrimental to local authorities then we should apply the same criteria to businesses.’*

Regarding exemptions from the requirements, the collective view felt that there should be none, unless there was an issue with a lack of space for containers which would make it a physical impossibility for separate collections. In addition the group did agree that there should be a minimum threshold by weight regards the requirement to separate recyclable waste for collection.

The general view regarding whether there was alternatives to legislation to increase business recycling the group felt that, *‘Where businesses have been self-regulating, progress has often been slow or patchy, this is perhaps shown in the decision to introduce Extended Producer Responsibilities (EPR). Therefore if businesses are required to meet regulations they are more likely to be more successful’.*

Proposal 18 – Businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste for recycling.

This proposal was accepted together with the understanding that again there should be a weight threshold for food waste. The comment was also made that, *'As it is likely that the local authority will collect most of this waste then perhaps 'sufficient' should be deemed in terms of the containers local authorities use. Consequently any business producing 240 litres per week (a standard domestic wheeled bin size), should be required to recycle food waste and this could then be collected as part of a normal food waste collection round'*

Proposal 19 – If proposal 18 is adopted, Government would like to support businesses, public sector and other organisations by providing ways to reduce the financial burden on these new requirements

No comments were recorded, although it would make sense to assist such organisations.

Proposal 20 - As part of implementing consistency Government will work with waste producers and waste collectors in non-household municipal sectors to improve reporting and data capture on waste and recycling performances of businesses and other organisations. Any requirements would be subject to consultation.

The collective view was that, *'there needs to be a requirement to record data if only to ensure they are complying with the requirements placed upon them'.*

APSE Comment

The long-awaited Resources and Waste Strategy Paper for England is welcome in setting a clear direction of travel for the way England will deal with its waste over the coming decades.

It is quite clear that Government genuinely intends to reduce not only the waste we produce as a nation, but also treat more efficiently that waste which we do produce in our everyday lives. Certainly they appear to have been galvanised into action by the declining state of England's environment and the stagnation in its recycling rates.

By linking reduced packaging and plastic use and improving recycling through introducing deposit return schemes and more consistent recycling collection systems, it is clear that a closed loop approach to waste creation, treatment and eventually reprocessing is the goal.

One area APSE would like to have seen more emphasis laid upon is waste minimisation and re-use advice for the general public in relation to avoiding non-recyclable or hard to recycle products and address more quickly the confusion on the current recyclability of

domestic and business waste. Home composting also seems to have been ignored at the expense of food and garden waste collections.

Certainly from the responses APSE received during its Focus Group in March of this year, and the wider network the view was that there was a great deal of support for the general aims of the strategy, albeit tempered with the proviso that Government supplies the relevant funding for the delivery of the strategy's aims.

However, further comments have been received which have raised one or two concerns, in particular with regards to the desire to enhance consistency of recycling collections, there will need to be complete realignment of collection infrastructures, including bin provision, round and staff rotas, vehicle fleet type and other associated recycling collection infrastructure. Government will have to therefore deliver on its promise to invest in this transition by making sure sufficient time and financial support is provided to local authorities and ensure this support is geared to acknowledging the level of change/disruption this new consistency of recycling collections brings.

The second area of concern, is in relation to the Deposit Return Scheme. This proposal has the potential to remove some of the more valuable waste streams from the control of the local authority, both through its everyday recycling collections, but also potentially via its commercial waste collections. This double hit on income is something that Government must take into consideration when considering who is given the task of collecting and bulking these materials and where the income is received. Currently it appears to be possible that the responsibility will be outside of local authority control. Certainly at a time when local authority budgets are being cut, then to lose these two income streams could seriously affect the economic viability of some waste collection services. Equally many authorities working contractually with private sector partners, particularly with regards to waste treatment facilities, may have agreed tonnages they have to deliver as part of waste contracts, and the loss of these materials could seriously impact on contractual arrangements.

Therefore APSE through consultation with its members does feel that there is a great many improvements which the new strategy could bring, as long as the correct level of support is provided and sufficient transition time is allowed.

With the advent of Brexit, it is hoped environmental legislation and the high recycling targets brought in by the EU are not diluted and Government continues to promote higher standards of waste reduction and recycling linked to wider environmental improvement if it is to live up to its claim that it will make the necessary changes that will enable us *'to become the first generation to leave that environment in a better state than we found it'*.

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