

Consultation on Consistency in Household and Business Recycling Collections in England

About You

1. **Would you like your response to be confidential?**

Yes / **No**

2. **What is your name?**

Steve Palfrey

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4. **Please provide information about the organisation/business you represent.**

Which of the following best describes you?

Other

If you answered 'Other' above, please provide details:

Local government network

What is the name of the organisation/business you represent? (Required. If you are responding on behalf of yourself please write 'individual')

Association of Directors of Environment, Economy, Planning and Transportation (ADEPT)

What is the approximate number of staff in your organisation? (If applicable)

ADEPT is a membership organisation representing Place Directors from county, unitary and metropolitan authorities, along with Directors of Local Enterprise Partnerships and corporate partners drawn from key service sectors. There are currently 78 local authority members, 12 LEPs, 15 corporate partners, and various other members. The Association is governed by a President and Leadership Team elected by the members. The Association employs a Chief Operating Officer and a small number of other, part-time staff.

Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK. We deliver the projects that are key to unlocking broader economic success and creating more resilient communities, economies and infrastructure.

ADEPT's broad policy position on waste and resources is set out in our statement published on 30th January 2019, available on our website here <https://www.adeptnet.org.uk/documents/adept-policy-position-resources-and-waste>.

Proposal 1

Q5 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?

- Agree** – local authorities **should** be required, to collect a core set of materials
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

Consistency will increase recycling performance, help on-pack recycling labelling and nationwide/local communications as well as providing increased customer clarity.

Consistency will only work if the packaging industry applies consistency in the materials they manufacture as well. Design out rogue/difficult materials.

Consistency will only work if there are end markets, so overall strategy needs to ensure this is supported – no point collecting material separately if it can't be recycled!
this is supported – no point collecting material separately if it can't be recycled!

Delivering consistency will also require the relevant infrastructure to enable sufficient, affordable and sustainable collection and haulage of recyclable material.

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree**
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

If the core list of materials is to be collected from all households, Government needs to recognise that costs and constraints are likely to be greater in dense urban areas, including those with many flatted properties, where space limitations and difficulties with ensuring that residents use the system as intended can limit cost-effective service provision and/or lead to poorer outcomes. Additionally, these housing types often have highly transient residents, adding to the difficulty with raising recycling rates. Finally,

providing accessible recycling bring sites, and recycling transfer arrangements, is also more challenging in dense urban areas.

Flats above shops, which make up 5 – 10% of housing in some urban boroughs, represent a particular challenge and significant cost. There is rarely space for containers outside the home, meaning that sacks must be placed on the public highway, and typically authorities have to provide collections to these properties several times a week, if not twice or more times a day, so as to reduce the impact on the public realm. On top of these costs and impacts on public realm and air quality, additional cost arises from the need for a specialist sub-fleet of split-compartment vehicles for these properties to accommodate recycling and residual waste in a single round, and the inefficiency that arises from mid-shift tipping of these split-compartment vehicles.

Local authorities need to retain the flexibility to deliver via commingled collections, because the constraints in relation to each estate or block of flat are such that they would need to be considered on a case by case basis (subject to significant capital investment by freeholders to improve waste containment areas). There is usually no specific pattern in the spatial distribution of blocks or estates such that those with similar characteristics can be built into rational distinct rounds.

The use of the term ‘occupier’ in relation to obligations under s46 of the Environmental Protection Act 1990 and the deregulation of enforcement against offences under s46 are also problematic. Planning approval of residential developments with inadequate waste storage areas is a significant problem which will be exacerbated by requirements for separate food waste, and any additional separation of dry recyclables. The planning and building regulations frameworks should be reviewed in this regard.

Furthermore, whilst additional powers are available to encourage compliance through landlords or property managers in relation to waste management from houses of multiple occupancy (HMOs), the reality is that housing enforcement officers have a wide range of priorities with few resources, and waste management is usually considered a low priority.

A review of s46 is greatly needed in the context of Government’s wider proposals (and in any event) to ensure that obligations in relation to the correct use of waste management systems falls on the individual or institution best placed to manage compliance (whether that be the individual, the landlord or the managing agent), that requirements are backed by a credible enforcement deterrent and that the offences relate to waste management behaviour (including first offences), not narrowly those offences that have an impact on local amenity. Powers to charge householders or landlords/managing agents for the collection and (where additional costs are incurred) disposal of waste not in conformity with a s46 notice should be explicitly held by local government.

Finally, the design of flatted properties is a key barrier to implementing these requirements. Planning law must be changed to ensure all homes have recycling designed in. The number of purpose-built apartments in London is increasing fast. Many new apartments are built with small kitchens with no space for a multi-compartment bin and the impossible task of carrying three bags of recycling to the bin stores adds to London’s recycling problem.

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

Further to the above there are many examples in London and other urban centres where waste storage facilities will not be adequately able to accommodate the requirements proposed by government, even if significant investment is made in the waste storage infrastructure of these buildings. This is often because older buildings were constructed without consideration of the recycling requirements, or simply because buildings have been given planning approval irrespective of adequate storage.

There are also instances where every attempt has been made to encourage residents to use waste systems correctly, but recycling services are still contaminated; this is particularly an issue under source separated systems where there is no downstream processing to remove moderate contamination. Local authorities should therefore have the ability to charge householders or managing agents for the collection and differential treatment costs of waste set out not in conformity with a s46 notice, or where additional collections were necessitated by their actions or building constraints.

However, especially in the event that the charging and enforcement powers are not reviewed, there will be buildings that practically cannot be served by the 'standard offering' communal household waste collections. The collection of repeatedly contaminated bins and the provision of additional collections to poorly designed or operated buildings places a strain on services and risks the contamination of correctly presented materials. As such, the tests relating to exemptions on Waste Collection Authorities (WCAs) under s45 and s45A obligations for the collection of household waste and the provision of recycling services should be relaxed to allow these services to be removed under more realistically defined circumstances.

Q9 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.

Delivering consistency will require significant changes in service provision for many local authorities. Both the transitional costs and greater ongoing service costs will need to be fully recognised through new burdens funding and/or Extended Producer Responsibility.

The consultation states 'complex rules' add to confusion of householders. However much of the complexity comes from the range of materials that the packaging industry puts on the market e.g. plastic products which appear "papery", bio plastics which appear like fossil-fuel plastics, composite packaging materials etc. The Government's overall strategy will need to drive out this complexity if the aspirations of reducing confusion and increasing the quality and quantity of material recycled is to be met.

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.

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
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Glass bottles and containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/>	<input type="checkbox"/>

Q11 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 of Consistency	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Difficult to secure a market for this material. It is also difficult to separate from other recyclables. So exclude but ensure collection and disposal costs are fully met through EPR. Review later.	<input type="checkbox"/> Are conditions a-d in proposal 3 met? If so include it from start.
Plastic bags and film	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Quality concerns (films can be contaminated and can contaminate other materials); difficult to sort at MRFs; difficult to find sustainable end markets Review later.	<input type="checkbox"/>
Other materials (please specify)				

Need to consider how confusing materials e.g. bioplastics are positioned. Are they in or out of consistent mix? How will the public differentiate? How will collection/sorting systems differentiate in order to create a quality secondary material?

Q12 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.

Q13 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?

Q14 Do you have any other comments to make about Proposal 2?

Any packaging streams that are not included in the core set of materials will not be recycled. The EPR system will need to a) ensure LAs costs of residual collection and disposal are covered, and b) should financially strongly disincentivise such packaging choices, otherwise may have unintended consequence of driving producers towards these options and undermining the scheme's objectives.

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.

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 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 (please specify which conditions you believe should be added ...)
- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

Proposal 4 (food waste)

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.

Q18 Which aspects of the proposal do you agree and disagree with?

(i) at least a **weekly** collection of food waste

Agree

Disagree

Not sure/don't have an opinion/not applicable

The separate collection of food waste is an area where ADEPT is not supportive of a consistent national approach. Food waste is now by average weight the single largest element of household residual waste and presents a significant opportunity to improve performance. The separate collection of food waste can enable cost effective treatment through anaerobic digestion or in vessel composting. However, separate collections of food waste add significant additional cost and can be complex to deliver. ADEPT believes councils should be free to decide themselves on the balance of cost and benefit for separate food waste collections, depending on local circumstances. In the event that the Government mandate for separate food waste collections then ADEPT believe there is a strong case for applying similar approaches to those used to determine the justification for separate collection of recyclables; i.e. by applying a test of technical, environmental and economic practicability. This approach could be based on an assumption in favour of separate collection of food waste unless an authority were able to demonstrate that to do so would fail the 'TEEP' test.

(ii) a **separate** collection of food waste (i.e. not mixed with garden waste)

Agree

Disagree

Not sure/don't have an opinion/not applicable

(iii) services to be changed only as and when contracts allow

Agree

Disagree

Not sure/don't have an opinion/not applicable

Challenges will be: AD industry gearing up – will need phasing over time and money flows will need to facilitate this – e.g. over 4 years from 2023.

Contracts will be more cost-effective if there is a competitive market.

Waste transfer arrangements will need rethinking.

(iv) providing free caddy liners to householders for food waste collections

Agree

Disagree

Not sure/don't have an opinion/not applicable

The approach adopted should be the one that sustains and maximises recycling of food waste.

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes (if yes please provided further details below)

- No
- Not sure/don't have an opinion

Some authorities' experience demonstrates that it is not always possible to provide an effective food waste service in flats above shops (5 – 10% of housing in some London boroughs) or properties without frontage in areas of high footfall. These properties can only realistically be served by on-street communal systems, but these often have extremely low yields, in part because the need to carry food a long way from the front door of each flat in biobags or other disposable containers, which have a tendency to split or leak. Finding a location for communal units that is convenient for householders is challenging. The lack of compulsion also reduces participation. The use of sacks or caddies for food waste is unlikely to be practicable. Communal food waste systems also need to be designed to avoid food waste littering the highways, which not only has animal by-products implications, but can in turn attract fly-tips and unpaid commercial waste. Communal systems also introduce additional street furniture onto the public highway.

As such the costs of such systems are likely to be high (including the costs of fly-tips and the wider streetscene impact), and participation is in many cases so low that collections would arguably not be an effective use of public money.

Q20 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?

What if sending food to EfW is the best most TEEP option?

Proposal 5 (food waste funding)

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

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

- I am not responding on behalf of a local authority
- Specific financial support (please specify) Transitional cost would need to include not only bins and trucks, but also adaptations to transfer stations and additional depot capacity.
- 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 (please specify ...)

Q22 Do you have any other comments to make about Proposal 5?

Funding needs to be both long term funding, and short-term transitional costs. Costs of this new burden will differ greatly in different collection authority areas. The timescales proposed for implementing the food service change are very challenging. Collection service changes can be implemented as soon as legislation and new burdens funding are in place. However, the facilities required to process the food waste once

collected will take a significant time to develop and this will not begin until the industry has sufficient certainty to commit to investment decisions.

ADEPT is specifically concerned about impacts on long term waste treatment contracts which may contain provisions where local authority clients provide effective guarantees over tonnages, composition or calorific value of waste which implementation of the Strategy may make it impossible for the local authority to control. For example, a DRS might significantly reduce the composition of recyclables processed through a local authority contracted facility leading to claims by the contractor. Similarly, mandatory food waste collections even if environmentally positive may prejudice an authority's ability to deliver on minimum tonnage guarantees for a waste treatment plant and/or calorific value guarantees and result in a penalty or claim for the operating contractor.

Such long-term contracts usually contain provisions for contractors to claim costs from local authorities under 'Change in Law' provisions within the contract. Of particular concern to ADEPT is that many of these contracts have been procured with Government support and using Government sponsored standard form contract documentation therefore it would be perverse for such authorities now to be penalised by implementation of a new Government strategy. ADEPT is keen to ensure that these types of consequential costs are recognised in any new burdens provisions arising from the implementation of the Resources and Waste Strategy.

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.

Q23 What are your views on this proposal?

Let the reprocessing market decide.

Proposal 7 (garden)

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

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable

(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input type="checkbox"/> N This should continue to be a locally determined service decision. To mandate free collections would contradict the 'polluter pays' principle that has been applied through much of the rest of the strategy.	<input type="checkbox"/>
(ii) A capacity to 240l (bin or other container eg sack)	<input checked="" type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input type="checkbox"/> <input checked="" type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input type="checkbox"/> <input checked="" type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input type="checkbox"/> <input checked="" type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> Assuming that legislation and new burdens funding is agreed sufficiently in advance. The lead-in time for service change and composting contracts would need to be at least one year, and more in any area where significant new composting infrastructure is required.

Q25 Do you have any other comments to make about Proposal 7?

ADEPT supports the separate collection of garden waste, but disagrees with the proposal that authorities should be required to provide this service free of charge.

Initial responses from authorities to ADEPT suggest that the Government's assumptions around a) the amount of garden waste currently in residual waste collections, and b) the economic impact/new burden cost of introducing a free garden waste service are inaccurate. If Government wishes to explore this proposal further then real evidence from local authorities should be used, and the differences between costs to authorities with different geographies and demographics would need to be reflected in new burdens funding.

Timing: the consultation document spells out that weight-based targets result in perverse behaviour, and specifically cites the example of free garden waste collection. If Government is minded to make free collections a requirement, ADEPT believes this should be put on hold until alternative targets have been more fully considered/developed to avoid conflicting policies.

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.

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No (why ...?)
- Not sure/no opinion/not applicable

Separate collection may not be the most cost-effective method of collection in all areas and may have undesirable consequences e.g. adding to road congestion. Evolution from existing services to achieve consistency in materials acceptance is likely to be more acceptable to local communities.

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence. Health and safety implications of kerbside sort schemes on collection staff (manual handling and prolonged exposure to traffic pollution) mean that many waste contractors are unwilling to operate this collection model. The HSE is expected to issue guidance on this shortly. In addition the local environmental impacts of noise and air pollution are likely to be greater than for other models that require less vehicles and less idling time.

Practical storage limitations within smaller houses, flats and communal bin-stores

Q28 Do you have any other comments to make about Proposal 8?

As evidence to support kerbside sort collections, the consultation states that: *“The level of rejects from recycling has increased over the last 10 years from 126,000 tonnes in 2006/7 to 467,000 tonnes in 2016/17. Available data for sampling of inputs*

to MRFs shows that 15.2% of material sent to be sorted was either non-target material or non-recyclable material”.

Surely the recent figures are a reflection of how good the sorting process has become in response to changing demands from reprocessors? And much of the change in figures can be attributed to a change in reporting when the MRF code of practice came into force.

Twin stream and kerbside sort systems are less flexible to changes in the relative capacities for different materials, which could well result from the implementation of Extended Producer Responsibility, consistency and a deposit return scheme.

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.

Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

The costs involved in implementing colour standardisation cannot be justified. It is also a waste of plastic, resources and transport to replace bins which are still in useable condition and goes against the principles of resource efficiency. However, a ‘preferred’ or ‘model’ colour scheme should be produced and where councils are introducing new containers the ‘model’ colour scheme should be followed.

Q30 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?

- Phased approach 1 – as and when waste contracts are renewed
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways please specify...

Explore standardised stickering instead.

If the core set of materials is clarified and better understood by the public, then is the standardisation of bins even necessary? Is there any evidence that householder are genuinely confused by the bins they already have?

Q31 Do you have any other comments to make about Proposal 9?

Linked to Q21 ref centralised procurement of containers, move away from bespoke to standardised in order to minimise cost to public purse – e.g. national framework contracts for bins.

There are very significant roll out costs as well as cost of purchasing and disposing of new/old bins.

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

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- Agree – government **should** publish statutory guidance
- Disagree – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

National Government should create clear legislation on 'what' is required. Local Government continues to be best placed to determine 'how' best to implement this in specific localities. 'One size' does not fit all.

Q33 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?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Q34 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 Do you agree or disagree with this proposal?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Local Government should remain responsible for taking decisions around local service provision.

If all the proposals in the waste strategy are effective then it may not be necessary/make sense to keep collecting residual waste weekly or fortnightly?

Reducing frequency of residual waste is proven to increase recycling participation, so surely the EPR funders wouldn't want their schemes' effectiveness to be undermined by fortnightly residual collections?

Note: response options for this question are poorly worded. Our view is that we disagree with imposing a minimum service standard, and believe local authorities are best-placed to determine whether this service COULD be provided more or less frequently than fortnightly, rather than imposing a view on any area that this SHOULD be collected more or less often as the response options indicate.

Q35 Do you have any other comments to make about Proposal 10?

If statutory guidance were to be issued, its publication would need to be very far in advance of its implementation to allow for service change, infrastructure change etc, and

to ensure authorities make the right change first time, rather than making service changes that subsequently don't comply with statutory guidance.

As identified by Government in the consultation document, sustained communications will be essential.

If service standards are to be identified for local authorities, it would be useful to also identify standards expected of service users in any guidance and communications materials i.e. if quality and quantity targets are to be met, LAs need a clear strong positive steer from Government that residents who wilfully and repeatedly get it wrong can expect enforcement action.

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.

Q36 Do you have any comments to make about Proposal 11?

WRAP remains a vital component in implementing the aspirations of the waste strategy and would be the obvious organisation to develop any future national campaign funded via EPR.

Some supportive measures and tools to aid local authorities in tackling misuse of bins and waste-related anti-social behaviour will also be necessary to support increasing quality and quantity of recycling.

Q37 What information do householders and members of the public need to help them recycle better?

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.

Q38 Do you agree or disagree with this proposal?

- Agree – government **should** work with local authorities and other stakeholders on this
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

Consultation questions on end markets

Proposal 13

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

Timing issue – how can industry gear up for a big bang in 2023? If there are no end markets, then there is no point collecting materials. Markets need to be addressed first before the collections. If mandated collections come in and there are no end markets where does this leave LAs and what happens to the material collected? What is Govt role in ensuring infrastructure is in place in UK.

Any targets/taxes/incentives need to specifically promote use of post-consumer recycled content.

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 delivery 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.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Local authorities do find benchmarking a useful starting point when we are looking to review our services, but there are so many local factors to disentangle when using that data. It shouldn't be assumed that one authority can match the performance of another authority simply because they fall in the same LA category.

We also support moving away from tonnage-based targets to measures that better reflect environmental outcomes.

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree
- Disagree (please expand ...)
- Not sure/no opinion/not applicable

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

High levels of recycling are not the only driver, what about waste minimisation? We welcome the proposal to use existing data sources (WDF) as much as possible, as reporting already takes a considerable resource to complete.

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.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Surely the point of a non-weight-based target is to encourage different outcomes – e.g. better environmental, social or economic. They could directly conflict. If we conclude the new non-weight-based target is better we should replace the old weight-based one with it.

However, it will take time to transition from one set of indicators and associated policies to another, so the weight and non-weight-based indicators should be published alongside each other for a transitional period to allow comparisons to be made over time.

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

Given the UK's climate obligations, surely any metrics must be designed to achieve these targets first and foremost?

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.

Q47 Do you agree that greater partnership working between authorities could lead to improved **waste management and higher levels of recycling**?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?
[Separate funding for inter-related functions and responsibilities.](#)

Q49 How might government help overcome these barriers?

[Fully fund the changes planned and remove this as a debating point between the two-tier councils](#)

Q50 Do you have any other comments to make about Proposal 16?

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.

Q51 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?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling**
- Something else (please expand ...)
- Not sure/no opinion/not applicable

[It makes sense to align with local domestic collection regime.](#)

Q53 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

- Yes – it should be practicable to segregate waste for recycling in all circumstances

- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

Q54 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

Q55 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?

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.

Q56 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?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q57 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?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q58 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?

Q59 Do you have any views on how we should define 'food-producing' businesses?

Q60 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 ...?)
- No
- Not sure/no opinion/not applicable

[Need to consider mobile caterers, self-employed etc. and how the proposals would work with them.](#)

Q61 Do you have any other comments to make about proposal 18?

This will massively increase AD capacity requirements. In the long term this will hopefully deliver economies of scale/reduce transport distances or transfer requirement. In the short term the capacity does not exist.

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.

Q62 What are your views on the options proposed to reduced costs?

District and borough councils currently offer these services to businesses in their areas and seek to minimise the burden on business through the synergies they have with domestic collection services. If Government is keen to pursue the option of local franchising of trade waste collections, this should be done at a district by district basis and should allow the local authority to bid to operate the franchise.

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

Proposal 20

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Surely this is necessary to help meet 65% target?!

Q66 Do you have any other comment on Proposal 20?

Councils have significant experience in collecting and reporting this information and, due to this experience combined with our role as a waste collector, we welcome involvement in any future discussions.