

Response ID ANON-JJ98-ZHP7-E

Submitted to **Consultation on Consistency in Household and Business Recycling Collections in England**

Submitted on **2019-05-13 16:39:10**

Introduction

1 Would you like your response to be confidential?

No

2 What is your name?

Name:

Q Durrani

3 What is your email address?

Email:

qdurrani@eppingforestdc.gov.uk

4 What is your organisation?

Please provide further comments :

local authority

What is the name of your organisation? Or if you chose 'other' above please provide details.:

Epping Forest District Council

Proposal 1:

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?

Agree – local authorities should be required to collect a core set of materials

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

Agree

Please provide further comments :

Subject to the collection of core materials being fully funded with no additional cost to Waste Collection Authority. Also, subject to contractual arrangements and potential required changes to fleet.

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

what are the barriers that local authorities face when collecting recycling from flats or houses of multiple occupancy:

Lack of storage space, planning requirements, participation, contamination, fly tipping issues, resistance of property agents.

Resistance to separating waste.

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

Please provide further comments :

Lack of storage space, planning requirements, participation, contamination, fly tipping issues, resistance of property agents.

Resistance to separating waste.

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

Please provide further comments :

We consider the principle of having a consistent set of materials could have a positive impact on recycling targets.

Planning requirements for new developments need to ensure adequate storage provision is made for the range of materials which will be collected. Compliance with design standards where they exist. Retro-fitting can be time consuming and costly. Managing agents need to be obligated to ensure full range of materials can be presented for collection.

Proposal 2

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

Do you believe these core materials should be included or excluded - glass bottles and containers:

Should be included in the core set

Do you believe these core materials should be included or excluded - paper and cardboard:

Should be included in the core set

Do you believe these core materials should be included or excluded - plastic bottles:

Should be included in the core set

Do you believe these core materials should be included or excluded - plastic pots, tubs and trays:

Should be included in the core set

Do you believe these core materials should be included or excluded - steel and aluminium tins and cans:

Should be included in the core set

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?

tick - food and drinks cartons:

Should be included in the core set

tick - plastic bags and film:

Should be included in the core set but phased in

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.

Please provide further comments :

Inclusion should be subject to market demand/value of the material.

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?

Please provide further comments :

Black plastic trays - once technological improvements enable them to be recycled. The necessary infrastructure needs to be in place and there needs to be market demand for the materials being collected.

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

Please provide further comments :

Encourage investment in local processing infrastructure links with the aspirations of the Circular Economy Package. Reassurance is required that there will be enough confidence in the local recycling market for businesses to develop and expand to meet the local market. This includes sorting infrastructure as well as this can sometimes be a barrier to viable end markets.

Proposal 3

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

Yes

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

Yes -but would also add some (please specify in box below)

Please provide further comments :

N/A

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

Please provide further comments :

It is imperative that local authorities are funded in full for any additional costs associated with an expansion to the core set of materials that they are required to collect.

Proposal 4

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

tick - a least a weekly collection of food waste:

Agree

tick - a separate collection of food waste (i.e not mixed with garden waste):

Agree

tick - services to be changed only as and when contracts allow:

Agree

tick - providing free caddy liners to householders for food waste collections:

Agree

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

Yes - please provide further details in the box below

Please provide further comments :

Yes in the vast majority of cases it should be practical to provide a separate food waste collection but there are likely to be a small number which are hard to access, have limited storage, no front or rear gardens etc.

20 Do you have any other comments to make about Proposal 4?

Please provide further comments :

See 19 above. With regard to 18 (3) above, implementation could potentially be subject to vehicle replacement programme. ECC to include something on IAA funding to support food waste collections.

Proposal 5

21 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

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

Please provide further comments :

We question the statement in the consultation, "where a weekly food waste collection is provided, our analysis assumes that weekly collection of dry recycling will also be provided as well". We offer a fortnightly dry recycling service and moving to a weekly service would mean significant costs. We would suggest costs Impact Assessment.

Proposal 6

23 What are your views on this proposal?

Please provide further comments :

Agreed as an interim arrangement provided that it does not delay implementation of separate food and garden waste collections.

Proposal 7

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

tick - (i) a free garden waste collection for all households with gardens:

Agree

tick - (ii) A capacity to 240l (bin or other container eg sack):

Agree

tick - (iii) A fortnightly collection frequency (available at least through the growing season):

Agree

tick - (iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement:

Agree

tick - (v) this new requirement to start from 2023 (subject to funding and waste contracts):

Agree

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

Please provide further comments :

Local authorities should retain the ability to decide whether they wish to charge or not, size of bin, frequency of collection, etc. Waste composition analysis

undertaken by Essex County Council has not found a significant amount of food waste in residual waste stream. In any case all residual waste in Essex goes to MBT not landfill. Proposals to offer free service is contrary to polluter pays principle. Where authorities have introduced charging for garden waste, purchase of home compost bins has gone up, home composting being the most environmentally sustainable way of dealing with garden waste. We are considering feasibility of introducing a charge for garden waste collection and would like reassurance that we will be fully compensated for any loss of income as a consequence of having to provide a free garden waste service. With regard to 24 (5) as well as contractual arrangements implementation will need to have regard to vehicle replacement schedules. Conversely if more local authorities go down the route of charging for garden waste collections it could lead to more bonfires and increased air pollution/statutory nuisance.

Proposal 8

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

Yes

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

Please provide further comments :

Whole system costs need to be taken into account along with environmental impact e.g. traffic etc. May not be feasible for some isolated properties. Considerable investment in terms of capital and revenue costs would be required for us to deliver separate collection of the core materials. Source segregated services can require additional depot and transfer station requirements to accommodate the higher frequency tipping required. Source segregated materials require significantly more manual handling than our existing twin stream comingled single kerbside bin and therefore takes longer. This can cause greater congestion on busy routes. Flats and HMO's with limited storage capacity for waste bins may not have enough space to provide receptacles for multiple waste streams. Risk of contamination of these waste streams is also high.

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

Please provide further comments :

If the DRS proposal is approved this could potentially impact on local authority waste streams, both in terms of quality and quantity.

Proposal 9

29 Do you agree or disagree with this proposal?

Agree - bin colours should be standardised 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?

Phased approach 2 - as and when old/unserviceable bins are replaced

Please provide further comments :

N/A

31 Do you have any other comments about Proposal 9?

Please provide further comments :

If a single collection system was introduced, linking packaging labelling e.g. blue dot to bin colours e.g. blue bin would help make recycling easier and increase participation and capture rates. Refer to WRAP guidelines.

Proposal 10

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

Agree - government should publish statutory guidance

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?

Disagree - it should be less often

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. Do you agree or disagree with this proposal?

Disagree - it should be less often

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

Please provide further comments :

WCAs should retain the ability to determine frequency of collection for residual waste, with the ability to move to three weekly collections if they so wish. Less frequent residual waste collections increases recycling performance.

Proposal 11

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

Please provide further comments :

WRAP should focus on communications and less on research. It will need to do more in order to embed the consistency/standardised service message nationally.

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

Please provide further comments :

Message needs to be simple, e.g. bin colours and packaging, improved labelling.

Proposal 12

38 Do you agree or disagree with this proposal?

Agree – government should work with local authorities and other stakeholders on this

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

Please provide further comments :

Simplicity is important. Utilise information obtained via Waste Dataflow, i.e. build on existing information rather than ask WDA/WCAs to provide more data. Extend reporting requirement to MRF operators so that materials can be tracked to end destination.

Proposal 13

40 Please use this space to briefly explain any comments you have on this proposal.

Please provide further comments :

Reduce reliance on export markets, develop UK (and European) markets. Need to ensure collection regime delivers high quality recycling.

Proposal 14

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

Agree

Please provide further comments :

N/A

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

Agree

Please provide further comments :

N/A

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

Please provide further comments :

Too much emphasis on recycling not enough on waste minimisation. Indicators will end up being presented as a league table. It is not clear what the purpose of these performance indicators is, e.g. comparisons with other local authorities, looking at trends over time within an authority. Strategy wants to move away from weight based targets but if carbon savings are to be measured this can only be done if materials are collected separately and are not comingled.

Proposal 15

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

Agree

Please provide further comments :

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

Agree

Please provide further comments :

N/A

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

Please provide further comments :

Carbon could possibly use the Scottish Carbon matrix. Cost should also have regard to local demographics.

Proposal 16

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

Agree

Please provide further comments :

N/A

48 What are the key barriers to greater partnership working?

Please provide further comments :

Too many vested interests, sovereignty, elected members. Different collection regimes. Contractual agreements, in-house versus outsourced services.

49 How might Government help overcome these barriers?

Please provide further comments :

The Inter Authority Agreement has provided certainty regarding tonnages and the funding mechanism agreed by the Essex Waste Partnership has enabled all WCAs to introduce weekly food waste collection services. Sharing of experience has helped implementation of new schemes and also encourage some authorities to move to alternate weekly residual collections. Legislation would help to overcome some of the barriers faced along with transparency around whole system costs. Funding needs to incentivise WCAs to recycle more.

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

Please provide further comments :

Local Authorities and Local Partnerships have done a great deal of work in this area and are already delivering successful partnership to achieve efficiency gains.

Proposal 17

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?

Agree

Please provide further comments :

N/A

52 Which of the 3 options do you favour?

Option 3 mixed dry recycling, separate glass recycling, separate food recycling

Please provide further comments :

N/A

53 We would expect businesses to be able to segregate waste for recycling in all circumstances but we are 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

Please provide further comments :

Yes but in a small number of instances there may be limited storage which makes this difficult.

Not sure/no opinion/not applicable.

54 Should some businesses, public sector premises or other organisations be exempt from the requirement?

No

Please provide further comments :

N/A

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?

Please provide further comments :

Businesses already have a number of environmental responsibilities which they struggle to meet. Infrastructure needs to be put in place to support them and to help them do the right thing!! Trade waste charges for recyclables should be cheaper than disposing of residual waste, so it should make good business sense for them to separate their waste.

Proposal 18

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?

Agree

Please provide further comments :

N/A

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?

Disagree (please explain in the box below)

Please provide further comments :

The target cannot be by weight but needs to be a % of the total weight disposed of - this will stop the distortion of collection data as a target on weight and may lead to some organisations not meeting the minimum threshold as they do not produce that level of waste.

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?

Please provide further comments :

No comment

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

Please provide further comments :

Have regard to definition of food business in Food Hygiene legislation.

60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

No

Please provide further comments :

N/A

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

Please provide further comments :

Needs to be properly funded, who will enforce the requirements?

Proposal 19

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

Please provide further comments :

Potential for RCHs to accept commercial waste.

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

Please provide further comments :

No comment.

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

Please provide further comments :

Utilise WRAP for advice to businesses.

Proposal 20

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

Agree

Please provide further comments :

N/A

66 Do you have any other comment on Proposal 20?

Please provide further comments :

No comment.