

Response ID ANON-JJ98-ZH2C-V

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

Submitted on **2019-05-13 18:06:52**

Introduction

1 Would you like your response to be confidential?

No

2 What is your name?

Name:

Ray Georgeson

3 What is your email address?

Email:

ray.georgeson@resourceassociation.com

4 What is your organisation?

Please provide further comments :

business representative/trade association

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

Resource Association

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 :

Resource Association considers that as well as agreement on a common set of materials, primary consideration should be given to the end market and use of those materials, which would steer guidance towards collection systems that prioritise quality through separate collection (dual or multi-stream to suit local conditions) with fibre (paper and card) collected separately from all other dry recyclables.

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:

There are now plenty of examples of best practice both in the UK and across Europe in the efficient collection of dry recyclables from flats, HMOs and high-density housing, all of which are capable of prioritising high-quality recycling, reducing contamination and focusing on sustainability by securing outlets for quality feedstock. Examples would include work done by Resource London, Zero Waste Scotland and ACR+ and exemplar municipalities in Europe such as those operated by Contarina s.p.a in Treviso, Italy.

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 :

See Q7 above and in addition, extra consideration is needed in communication with residents, recognising the likelihood of higher than average turnover of residency in flats and HMOs and often, demographic and language diversity that require sustained and focused effort to ensure residents are aware of and use systems in place.

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 :

High-quality recyclate should be central to the entire strategy for Consistency, without this there is the danger that we carry on with the notion of 'convenience' as the driver without proper recognition of the essential needs of the actual end user of materials – the reprocessor. Both convenience and consistency can be achieved with well-designed separate collection systems and full attention must be given to explaining the importance of the end user in recycling to the public.

UK infrastructure for reprocessing can further develop, based on the guarantee of consistent high-quality recycle. Without this, there will be limitations - but clearly where the feedstock is good and consistent, investment will follow.

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:

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

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 :

Food and drinks cartons should be included in the core set but our preference is for separate collection from the rest of the fibre stream, probably alongside plastics and cans (using either dual or multi-stream systems).

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 :

This depends significantly on the possible impact of an 'all in' DRS, should that be implemented. As DRS is likely to impact on existing local council kerbside services by reducing volumes of material with value, there will be significant challenges in ensuring the efficiency of remaining kerbside services then focused on currently harder to collect/recycle materials and fibre as the backbone of the service.

As demand rises for more and different materials and products to be collected consistently, there will be an increased need for well-designed separate collection systems. The Welsh Government Collection Blueprint provides a very useful guide to the possible, now well established with high levels of performance and satisfaction in its operation.

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

Please provide further comments :

We remain concerned at the potential lack of clarity in the relationship between the impact of DRS and the core set of materials proposed for Consistency, many of which are DRS targets.

Our view remains that DRS should be placed on hold while EPR reform and Consistency, aligned with each other and implemented in tandem, are allowed time to establish and achieve our shared desired outcomes. DRS is a further intervention that may prove useful in achieving targets if EPR does not fulfil expectations, but at this stage, it is an intervention too many.

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 :

■ Yes – this would appear to be a role well suited to the management organisation that needs to be created to manage EPR

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

Please provide further comments :

No.

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:

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

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

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

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

No

Please provide further comments :

No – there are plenty of examples of good practice collections of food waste from flats and small houses where well-designed collection systems can work well and meet residents' expectations. Milan was a world-leader here and many others have followed – we should be able to emulate; food waste collection is a critical element of resource management that should be available to all that want it.

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

Please provide further comments :

There should be few situations where food waste collection is impractical. Where the will and the intelligent service design is there, the service can and should be provided. In many cases, it works well and is efficient when designed into multi-material dry recycling collection, as per the Welsh Collection Blueprint. We acknowledge that this will not work everywhere and there is a danger that service re-design with weekly food waste at its heart may not satisfy the needs of end users of dry recyclables. Quality of the end product provided to the reprocessor should always direct the design of collection.

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 believe that the additional funds expected by councils from EPR for collecting packaging need to be protected with some form of ring-fencing mechanism that also restricts the ability of councils to reduce budgets in anticipation of future funds. We see that this will be difficult to implement and politically sensitive, but there must be some form of guarantee for producers that EPR monies will be used for the purpose for which they were intended

Proposal 6

23 What are your views on this proposal?

Please provide further comments :

No comments.

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:

Not sure/ don't have an opinion

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

Not sure/ don't have an opinion

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

Not sure/ don't have an opinion

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

Not sure/ don't have an opinion

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

Not sure/ don't have an opinion

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

Please provide further comments :

No.

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 :

Q26– the Resource Association continues to assert that quality of recyclate is critical to the success of UK recycling and can be delivered using dual and multi-stream collection systems. Very rarely in our experience has consistent high-quality been achieved using co-mingled systems with MRF sorting, and we maintain that most value and compliance for exports will be achieved with separate collections, especially of the fibre stream.

Q27 - There should be no circumstances that prevent the separate collection of those identified materials. Collection systems are well established that deliver these materials separately, and they can be tailored to the needs of particular material streams. It is a myth that co-mingled collection delivers better yields, participation and satisfaction – contamination losses at MRFs and further cleaning up losses at reprocessors are not fully captured by the system and the public are largely unaware of this. If a full costs and impacts assessment was made, the case for separate collection would be further reinforced and if transparency in the system extended to full public awareness of what actually happens after collection, the notion of the 'convenience' of the co-mingled collection would soon be debunked.

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

Please provide further comments :

The Resource Association established several years ago that there was a clear and substantial cost to reprocessors in dealing with the impact of contaminated feedstock arriving at their factory gates. Our Costs of Contamination report noted a range of costs attributed to different materials streams. Much of this cost derives from cleaning up materials from MRFs derived from co-mingled collections.

Proposal 9

29 Do you agree or disagree with this proposal?

Agree in part - bin colours should be standardised for some waste streams but not all please specify which

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 1 - as and when contracts are renewed

Please provide further comments :

Q29 and Q30: We consider this issue as secondary to the need to design and implement good separate collection systems for high-quality recycling. If we were starting from scratch, of course we should standardise colours, but we aren't and so at best, some creative management should be applied to design labels or stickers that standardise messages and iconography around Recycle Now standards.

31 Do you have any other comments about Proposal 9?

Please provide further comments :

No.

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?

Agree

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?

Agree

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

Please provide further comments :

Q34: Agree – although evolving practice suggests that there are increasing circumstances in which longer frequencies are efficient and acceptable to residents. Alternative weekly should be the starting point for a service standard minimum and Government should not be afraid to extend this as service development evolves.

Q35: Quality and the needs of the end market should be the primary focus, understanding the actual need of the real recycler, the reprocessor. Recycling should therefore be measured at the point of entry to the reprocessor, not the sorting or collection point.

Proposal 11

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

Please provide further comments :

We welcome the proposal and continue to support Recycle Now which is well established, professional and highly regarded.

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

Please provide further comments :

Clear labelling that aids not confuses, with regard to the actual recyclability of products and materials. Eliminate 'check locally' as soon as possible, it is undermining good efforts.

Localised communications to support national campaigns, and generate a new spirit of civic engagement and solidarity in which not recycling becomes socially unacceptable.

Much better information on what happens to recycling and where it ends up, provided to the public in engaging ways.

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 :

End Destination of Recycling reporting should now be made mandatory. We have valiantly led on this issue for a number of years with our End Destination of Recycling Charter, enthusiastically embraced by a small number of councils on a voluntary basis and largely ignored by the majority, citing resistance from their waste management and export contractors due to notions of commercial confidentiality. This is no longer tolerable, as the lack of transparency combined with poor export practices have led to an undermining of public confidence in the recycling process which must be urgently addressed and no longer swept under the carpet.

Proposal 13

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

Please provide further comments :

We were surprised that there wasn't more emphasis placed on detailed proposals to develop end markets and reprocessing infrastructure contained within the suite of Government consultations currently live. While the proposed Plastic Packaging Tax threshold for 30% recycled content may well assist in plastics, we are not convinced that this measure alone will be sufficient.

Consistent high-quality recyclate production remains the key factor to get right. If we do this, then our prospects of supplying materials legally, ethically and consistently to export outlets would increase and avert the worst prospects likely as a result of the closure of and increased resistance by Asian Tiger markets to contaminated recyclate from the UK.

Alongside this, we need to renew our approach to recycling development and reapply the principles established by WRAP in 2001-08 for the next generation challenges. There are welcome signs that this is being addressed, including within the UK Plastics Pact, but more visibility, research and stakeholder engagement is needed to identify and nurture future new uses for recyclate in UK industry

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 :

We agree.

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

Agree

Please provide further comments :

We agree.

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 :

No.

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 :

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

Please provide further comments :

It would be good to look afresh at the work done on carbon metrics in Scotland as well as understand better that actual recycling takes place at the reprocessor and adjust targets accordingly.

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 :

48 What are the key barriers to greater partnership working?

Please provide further comments :

In our experience, local political rivalries at both Member and Officer level remain barriers to effective partnerships, where goodwill is needed in the absence of substantial local government reform of the two-tier system.

49 How might Government help overcome these barriers?

Please provide further comments :

Be brave and reform the two-tier system - long overdue for review and reform. But we know this is highly unlikely.

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

Please provide further comments :

No.

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 :

52 Which of the 3 options do you favour?

Something else (please explain in the box below)

Please provide further comments :

Focus on separate collections in line with household collections. There should be no need to substantially differentiate between the two - the experience and requirements should be the same for household-like materials. We consider the Impact Assessment for co-mingled collections to inadequately reflect recent market changes including the impact of the China waste ban, increased MRF gate fees and handling costs -all of which should work in favour of the benefits of separate collections.

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 :

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

Yes (which ones and why? Please use box below)

Please provide further comments :

Possibly individual self-employed tradespeople or certain circumstances such as local premises that manage hazardous wastes such as doctors and dentists, where the haz waste management is the priority

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 :

Voluntary approaches always have their limitations.

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 :

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 :

Our understanding is that this hasn't worked well in Scotland and consideration is being made to remove or reduce the 5kg minimum threshold and include all appropriate businesses. It is open to abuse and doesn't focus all businesses' attention on the need to reduce and manage food 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 :

This needs research, one suggestion would be a 2kg de-minimis.

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

Please provide further comments :

Most offices produce food waste so our steer would to be inclusive rather than restrictive.

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

Not sure/no opinion/not applicable

Please provide further comments :

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

Please provide further comments :

No.

Proposal 19

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

Please provide further comments :

We are supportive but would suggest that while SMEs can be challenging to engage with, there are good reasons for full involvement of all in the business sector, just as there are for full involvement of the public.

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

Please provide further comments :

Efficient sorting of materials at source will reap benefits further in the recycling value chain and encourage a sustainable manufacturing base for recyclates that provides sustained outlets and cost efficiencies.

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 :

Some caution needs to be exercised on the notion of franchising business waste collection, this could have an impact on reprocessors' ability to take back materials unused and subsequently recycled again by the reprocessor (such as finished reels from pressrooms not needed). Local franchising of business waste collection should be only considered for business under a certain size - research needed.

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 :

66 Do you have any other comment on Proposal 20?

Please provide further comments :

No.