

## Appendix 1

### Consultation on Consistency in Household and Business Recycling in England

#### **NFDC response – June 2021**

Please note, not all questions are relevant to local authorities, and only the questions to which NFDC will be responding are included here.

NFDC responses are shown in red.

Some questions need to be read alongside the consultation document, found here:

[https://consult.defra.gov.uk/waste-and-recycling/consistency-in-household-and-business-recycling/supporting\\_documents/Recycling%20Consistency%20Final%20Final%20Consultation\\_May%202021.pdf](https://consult.defra.gov.uk/waste-and-recycling/consistency-in-household-and-business-recycling/supporting_documents/Recycling%20Consistency%20Final%20Final%20Consultation_May%202021.pdf)

#### Part 1 – Measures to improve the quantity and quality of household recycling

##### Dry Recycling

**Q6. Do you agree or disagree that local authorities should be required to collect the following dry materials from all households, including flats, by the end of the financial year in which payments to local authorities under Extended Producer Responsibility for packaging commences (currently proposed to be 2023/4 subject to consultation)?**

|                                        | <b>Agree</b> –this material can be collected in this timeframe | <b>Disagree</b> –this material can't be collected in this timeframe | Not sure /don't have an opinion /not applicable |
|----------------------------------------|----------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------------------|
| Aluminium foil                         | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |
| Aluminium food trays                   | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |
| Steel and aluminium aerosols           | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |
| Aluminium tubes.<br>tomato puree tubes | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |
| Metal jar lids                         | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |
| Food and drink cartons, e.g. Tetra Pak | <b>Agree</b>                                                   | <input type="checkbox"/>                                            | <input type="checkbox"/>                        |

**Q7. If you have disagreed with the inclusion of any of the additional materials above in the timeframe set out, please state why this would not be feasible, indicating which dry recyclable material you are referring to in your response.**

**Q8. Some local authorities may not be able to collect all these items from all households at kerbside by 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date?**

Collection contracts

Sorting contracts

Materials Recovery Facility (MRF) infrastructure capacity

Cost burden

Reprocessing

End markets

Other (please specify)

Please provide the reason for your response and indicate how long local authorities require before they can collect all of these materials, following the date that funding is available from Extended Producer Responsibility.

In Hampshire, aluminium foil, aluminium tubes, cartons, and lids are not materials that are currently collected. The addition of these materials to current and future collection systems will be relatively straightforward, as they are low volume and low weight materials. It is likely these materials would add a max of 3% to NFDC recycling rates, based on composition and capture data. However, to be able to sort these items in a MRF will require new infrastructure as the current facilities do not have the technology or capability. We are aware of the 2023/24 deadline and will work with partners to deliver infrastructure to enable both the collection and processing, but this does rely on there being no delays in order to meet what is quite a short deadline for the scale of change involved. In any case, our requirement for new infrastructure will be driven more by the need for separate collection of recyclables, rather than the addition of these materials per se.

Adding this material is going to change the waste flows in Hampshire, which in turn will impact the transfer stations and their capacity. This is going to require a large piece of work to be undertaken to model new waste flows and possibly new arrangements for tipping at transfer stations to ease congestion and avoid too many peaks and troughs. Without the outcomes of the consultation, it is difficult to know for certain what the future picture of waste volumes and movement will be, and again this will make the 2023/24 deadline quite tight.

Clarification is needed as to the exact transition timetable. On page 26 of the consultation, it states that all Local Authorities should 'to be able to collect these materials by the end of the financial year' (2023/24). When Local Authorities undertake service change, it is not done so across the service area at once, but through a phased approach. This situation is magnified in a County area like Hampshire with 13 WCAs. Rolling out new collections may need a long implementation period, and so it would be helpful to know if authorities are expected to be collecting across their whole service area by March 2024, or have commenced a roll out.

If Local Authorities require new vehicles or new bins to enable service change, this may also cause delays given the volume of change and the number of authorities who may be looking to source the same items. It needs to be ensured that industry can provide the additional items that Local Authorities need, and if not, the timescale should be more flexible. There is a role for Government here in overseeing some of the strategic procurement needed to introduce these changes.

We are concerned that the aluminium products are difficult to clean and may cause some contamination of other materials. Aluminium tubes are hard to clean without cutting open first (Feedback from the aluminium reprocessing industry should be sought as to the potential impact of this on overall material quality).

It will require good and consistent communications with residents to ensure that they understand the expanded range of items they can recycle at the kerbside, whilst some items may be removed from kerbside recycling under the Deposit Return Scheme. These communications can also ensure that residents understand the importance of only placing clean and dry items into their recycling.

Even with the delivery of new infrastructure in Hampshire, cartons will still need to be sorted by hand in a MRF setting, as there is not currently the technology for reliable carton sorting. This requires employing additional staff at sorting facilities and is labour intensive. We would like to see investment in improving sorting technology to ensure that there is less manual labour needed.

We are aware that currently there is only one facility in England which is able to reprocess cartons and has limited capacity, we would like confirmation that if we start collecting these materials there is the capacity for them to be reprocessed and recycled, ideally in the UK. We may also be awaiting technological improvements here – our understanding is that there is not currently the technology to recycle all components of a carton. If there is not more capacity in place by the time Local Authorities are expected to begin collecting the material (2023/24) and therefore some of the collected material is not able to be recycled, this would be a big blow to public confidence. It would also mean that cartons don't meet the criteria for introducing a new material, as per page 50 of the consultation document which states that the Secretary of State has powers to add further recyclable waste streams through regulations, but only if that stream meets a set of criteria which includes 'appropriate end markets'.

This situation also underlines the complexity around timescales in relation to product labelling, as any changes in labelling need to align with service changes at a local level.

Plastic pots, tubs and trays (PTT) have not been listed separately as a new material in this consultation. However, there are still a significant number of authorities in England which are not collecting PTTs. One of the reasons that Hampshire authorities have not already added PTTs to its recycling services is the lack of viable end markets, especially for certain fractions of the PTT mix, such as PET. If PTT are to be added as a core material, Government need to ensure that the processing capacity is viable and in place to ensure the material is recycled and not disposed of. Addition of this material to our collections will have impacts on the required infrastructure to sort the material, which again reiterates the need for flexibility with deadlines for change, when we are relying on the planning, building and commissioning of significant new infrastructure.

**Q9. Do you agree or disagree that food and drink cartons should be included in the plastic recyclable waste stream in regulations, to reduce contamination of fibres (paper and card)?**

**Agree** – cartons should be included in the **plastic** recyclable waste stream

**Disagree** – cartons should be included the **paper and card** recyclable waste stream

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

Please provide the reason for your response and state if there are any unintended consequences that we should consider.

We understand and agree with the rationale behind cartons being included in the plastic recyclable waste stream. However, it is understandable that residents will naturally consider cartons to be a paper product as that is what most of a carton is made from. It will have to be communicated carefully to residents that cartons are considered a plastic item and the reasons why this is. If communications focus on cartons as being a food and drink container it will help with residents understanding why they don't recycle them with paper. Product labelling may also have a role to play.

**Q10. Assuming food and drink cartons are included by the date that Extended Producer Responsibility commences, what would be the financial impact on gate fees and processing costs from sending mixed material streams containing cartons into a Materials Recovery Facility?**

No increase

0–9% increase

10–20% increase

21-100% increase

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

Please provide the reason for your response.

We are unsure at this time how gate fees would be affected. However manual sorting would be necessary for food and drinks cartons as at this time the technology does not exist for reliable sorting, and this would increase processing costs.

If the public incorrectly place cartons with paper and card, it could de-value that stream.

#### Collection of plastic films from households

We propose that local authorities already providing a collection service for plastic films should continue to do so. We propose that local authorities without a collection service for plastic films as soon as possible and by no later than the end of the financial year 2026/27.

**Q11. Do you agree or disagree that local authorities should adopt the collection of this material from all households, including flats, no later than 2026/27?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

**Q12. Which of the following reasons might prevent plastic film collections being offered to all households by the end of the financial year 2026/27?**

Collection contracts

Sorting contracts

Materials Recovery Facility (MRF) infrastructure capacity

Cost burden

Reprocessing

End markets

Other (please specify)

Please provide the reason for your response and provide evidence to support your answer.

As with the EPR response, the partnership agrees with this as an aspiration, and in terms of collection this should be straightforward as the item is lightweight and compactable. However, end markets for plastic film are still being developed and tested and it is unclear how scalable these will be and how much capacity they will be able to provide. Because of the issues around traceability, as well as consumer confidence, where possible we should be recycling plastic within the UK rather than exporting it. Additionally, there is a concern about how clean the film and flexibles would be when presented for recycling by the public, and how well sorting infrastructure can cope with such small, light pieces items without them getting caught in the machinery. These issues need to be addressed before it is decided that local authorities will begin to collect plastic films.

The definition of films and flexibles in the consultation document only gives the examples of bread bags, carrier bags and bubble wrap. This is a very narrow definition and doesn't state whether the items that are currently collected by supermarkets are also included ([Plastic film & carrier bags | Recycle Now](#)). The same applies to flexible packaging, we assume this means pouches, but there are no examples given. A significant part of the problem with films is the large range of types and formats. If only certain types, polymers, or formats meet the test for having "appropriate end markets" then there could be a situation where either consumers or Councils or both, must sort one type of film from another. This will undoubtedly lead to (a) lower levels of participation from the public and/or (b) higher levels of contamination. We are unsure of what technological solutions to the issue of polymer sorting may be available. There will need to be very robust product labelling guidelines in place to enable consumers to make the right decisions.

Plastic film polymers may change over time, especially with the plastic tax and modulated fees under Extended Producer Responsibility. This will be difficult to manage and the EPR reporting systems will need to ensure they pick up these changes up and communicate with Local Authorities so they can pass the information on to residents and monitor what residents are putting in their kerbside recycling appropriately.

As with cartons, plastic films and flexibles will need at least some manual sorting at a MRF, this will require additional staff and is labour intensive which will increase processing costs. Additionally, human error may mean that some materials gets missed. Investment needs to be made into the technology to replace manual sorting.

#### Proposals on the definition of food waste

**Q13. Do you agree or disagree that the above should be collected for recycling within the food waste stream?**

Agree

Disagree

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

If you disagree, please provide the reason for your response

We disagree with the definition. The definition states 'consumed by humans' but we know that some authorities include pet food waste in their food waste recycling. It needs to be clear whether this is included or not going forwards. Additionally, there are elements of food waste like banana skins or bones, that are not consumed by humans, but still food waste.

Additionally, the example of food scraps is misleading. Food scraps makes it sound like leftovers only, we would prefer consistency with the WRAP definitions of avoidable, possibly avoidable, and unavoidable. It should also be noted that many teabags contain microplastics, so this needs to be addressed so food waste isn't contaminated.

### Proposals on separate collection of food waste from households for recycling

#### Q14. Which parts of Proposal 4 do you agree or disagree with?

|                                                                                                                                                                                                                                                                                                       | Agree                    | Disagree                 | Not sure / don't have an opinion / not applicable |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|---------------------------------------------------|
| Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the <b>2023/24</b> financial year                                                                                                                                | Agree.                   | <input type="checkbox"/> | <input type="checkbox"/>                          |
| Local authorities should have a separate food waste collection service (at least weekly) in place for all household properties including flats as quickly as contracts allow                                                                                                                          | Agree                    | <input type="checkbox"/> | <input type="checkbox"/>                          |
| Local authorities without existing contracts in place that would be affected by introducing a separate food waste collection service should have a separate food waste collection service in place (at least weekly), for all households including flats, by the 2024/25 financial year at the latest | <input type="checkbox"/> | <input type="checkbox"/> | Not sure                                          |
| Local authorities with long term existing mixed food/garden waste collection or disposal contracts in place should have a separate food waste collection service in                                                                                                                                   | Agree                    | <input type="checkbox"/> | <input type="checkbox"/>                          |

place (at least weekly) for all household properties including flats as soon as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31

Local authorities with long term residual waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from Waste or Mechanical Biological Treatment contracts) should introduce a separate food waste collection service (at least weekly) to all households including flats as soon as contracts allow, with an end date to meet this requirement to be set between 2024/25 and 2030/31

Agree



Please provide any views on the end date for these obligations and any evidence on associated costs and benefits.

**Q15. Some local authorities may experience greater barriers to introducing a separate food waste collection service to all household properties, including flats, by the dates proposed above. For what reasons might it be appropriate for these collection services to begin after this date?**

Treatment contracts

Cost burden

Reprocessing

End markets

Other (please specify)

If you have disagreed with any of the proposed implementation dates above, please provide examples of circumstances where it would be appropriate for this collection service to begin after these proposed dates and any supporting evidence where possible.

Firstly, it is not clear whether the requirement for collections of food waste by the “2024/25 financial year at the latest” means that collections should be in place by the start of 2024-25 or the end? Our preference would be for the end, as that gives a chance to spread out implementation over a long period of time and allows the private sector vehicle and container manufacturers more time to fulfil requirements.

Currently in Hampshire there are two authorities who are collecting food waste. The remaining eleven authorities, along with 49% of local authorities across England, will need to procure vehicles

and caddies in order to introduce food waste collections. Authorities will be hugely dependent upon the private sector for this manufacturing capacity, and this may mean there are delays, dependent on the ability of the private sector to deliver. It is hoped that the sector will respond to this consultation to advise on such issues. It may be that Central Govt or appointed body such as WRAP, need to take a co-ordination role, maybe on a regional basis, to ensure consistency of supply, so that implementation timetables can be achieved.

Food waste collections will require additional professional drivers. Currently there is a national shortage of qualified drivers, with WCAs unable to compete with private sector HGV salaries. This may push WCA salaries upwards as the only way to attract staff to these new roles.

The transfer network in Hampshire was not built to accommodate food waste tipping and will need to be upgraded. We already know that there are some sites that do not have the space for food waste tipping, and others will need to be reconfigured. Again, this will all impact on the ability to roll out food waste in Hampshire to meet the deadline, and is further complicated as not all Hampshire waste collection authorities will be able to introduce food waste at the same time which means the transfer stations will need to be upgraded depending which authorities are able to introduce food first and this will put pressure on the rest of the network. This pressure on the network is compounded by additional requirements for dry recycling which currently utilise the same network.

Currently in Hampshire we don't believe there is not a reprocessing solution that could handle all food waste that will be separately collected in future. Additional AD capacity will be needed, and this could be an issue if it is not addressed soon as it takes time to get large infrastructure approved and built. It is highly likely that AD infrastructure may not be developed in time to enable collections to start by March 2025.

As mentioned in our response to the previous consultation, flats, HMO's, and those built through permitted development may have issues with space for food waste bins, and some may require more bespoke solutions which will take longer to implement. They will also require more communication and engagement to ensure they participate going forwards and this is a burden on local authority resources.

Many authorities may find it hard to make decisions about the introduction of food waste collections until more clarity is provided on new burdens funding. In particular, with regard to food waste:

- The consultation refers to “ongoing operational costs”. It is not clear how long these costs would be covered by Govt for. There should not be an end date to this funding.
- Capital costs are also referred to, which would apply to initial rollout. It also needs to apply to the future capital replacement programme i.e. when the new vehicle fleet comes to the end of its life.
- How will any capital, revenue or one-off costs be calculated? Will costs be modelled in much the same way that EPR funding will be? Calculations need to allow for local circumstances.
- Regarding the scope of costs:
  - In the New Forest we would estimate that 15 new vehicles will be required to collect food waste. This will require us to have an additional depot – the cost of a new depot should therefore be funded by Govt, as it is a direct result of the new burden.
  - Other overheads should also be included, such as customer services, communications, procurement etc.
  - Food waste disposal costs should be included, and consideration is needed of how this will be accounted for in different 2-tier areas where differing financial arrangements may be agreed locally between WCA and WDA. In addition, cost



calculations should take account of travel distance to infrastructure i.e. if we do not have a local AD facility to use and must pay higher haulage costs.

- Councils will need to commit funds to purchase vehicles and build AD facilities, for example, in order to achieve the target dates. Our understanding is that new burdens funding would be introduced for all authorities at the same time. This may not support early adopters financially, which may mean Councils take decisions to wait for the new burdens funding to arrive rather than being early adopters, missing an opportunity for food waste introduction to be spread over a period of time. This will not help to spread the burden on vehicle/container manufacturers.

## Proposal on caddy liners

### Proposal 5

We propose that the provision of caddy liners in the collection of separately collected food waste should be promoted as good practice and that guidance should be provided on caddy liners, including on caddy liner material types.

**Q16.** Do you agree or disagree with this proposal? Please provide any other comments on the use of caddy liners in separate food waste collections, including on any preferences for caddy liner material types.

Agree

Disagree

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

We agree that guidance on caddy liners and good practice should be included to help inform local authority decision making. Additionally, there is a lot of different guidance on the best materials for caddy liners, and a definitive guide on this would be helpful, we would like this to include the issues of caddy liners and microplastics. However, unless the cost of caddy liners is covered in new burdens funding, many authorities will not choose to provide them to residents because of the ongoing cost burden. In line with the figures quoted in the consultation document, this will lead to significant numbers of residents stopping using their food waste service or using incorrect caddy liners. There will also be inconsistencies between authorities, with those able to afford caddy liners giving them to residents for free and getting a better participation rate.

Our understanding is that many AD facilities do not want compostable liners in their facilities because they do not fully breakdown, and therefore they remove the bags at the start of the process and send them to an energy recovery process or to landfill. Central Govt needs to take a lead here, working with collectors, processors, and liner manufacturers, to come up with consistent specifications and other ways of tackling these issues at a national level.

## Proposals on biodegradable and compostable plastics packaging materials

### Proposal 6

We propose to provide further guidance to local authorities and other waste collectors on the collection and disposal of compostable and biodegradable materials in kerbside waste streams.

**Q17.** Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this

could include examples of what should be provided in guidance on the collection and disposal of these materials.

As per our response to EPR consultation question 44, we feel believe that further research should be done into compostable and biodegradable materials outside of laboratory conditions, this will help guide how they should be treated. Citizen science, like the University College London study on compostable and biodegradable plastic ([Big Compost Experiment](#)) can help provide the real-world information to inform how Local Authorities can advise residents on how they should treat these materials.

Until this time, there needs to be clear and consistent communications for compostable bags, messages telling residents to home compost them, but that they can't be used as caddy liners are extremely confusing.

**Q18. Do you agree or disagree that anaerobic digestion plants treating food waste should be required to include a composting phase in the treatment process?**

Agree

Disagree

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

Please provide any evidence where possible and explain any advantages and disadvantages.

#### Proposal on the definition of garden waste

**Q19. Do you agree or disagree with the materials included in and excluded from this description of garden waste?**

Agree

Disagree

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

If you disagree, please provide the reason for your response, and specify which materials should be included or excluded in this definition.

It isn't stated whether garden waste includes windfall (e.g. apples), which fits with the definition of garden waste being an 'organic material arising from the garden'. It needs to be clarified whether this should be included in garden waste or food waste.

Additionally, "garden weeds" is misleading and needs to be further refined, there are many types of garden weeds that should not be composted as they can spread easily, such as Japanese Knotweed, Ground Elder, or Bindweed for example.

**Q20. Given the above costs, recycling benefits and carbon emissions reductions, do you agree or disagree that local authorities should be required to introduce a free minimum standard garden waste collection (240 litre containers, fortnightly collection frequency and throughout the growing season), if this is fully funded by Government, and if authorities remain free to charge for more frequent collections and/or additional capacity?**

Agree

Disagree

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

Please provide any comments or evidence on the costs and benefits presented above.

Free garden waste has a huge cost to all and means those that don't have gardens subsidising people with gardens, and those who home compost also subsidising those who have a garden waste collection. It goes against the fundamental principle whereby those responsible for producing waste, should be financially responsible for its disposal. Free garden waste collections might also have a detrimental effect on home composting rates. Those who currently home compost might stop because a free garden waste service seems more appealing than compost bins taking up space in their gardens and requiring the maintenance needed to make them successful.

In Hampshire there is a large network of Household Waste Recycling Centres, these offer free disposal of garden waste for those unable to use a chargeable kerbside service. This means that all residents in Hampshire have the ability to dispose of their garden waste already – via either chargeable kerbside services, HWRCs, or home composting.

The aim of free garden waste collections is to increase recycling by removing the material from residual waste, however according to a waste composition analysis undertaken in 2018 across Hampshire, there is only 3.6% garden waste in residual, and 0.4% in DMR. Therefore, despite the majority (except for two authorities in 2018) of authorities in Hampshire operating a “charged for” garden waste collection, there is very little being placed in residual waste or DMR at the kerbside.

Additionally, the base assumptions used to calculate the carbon benefits seem to assume that garden waste is being sent to landfill, we would like to see the carbon remodelled using waste composition analysis to get a more accurate gauge of how much waste is in residual across England, and how much of this is going to ERF or landfill. This will give a more accurate assessment of the carbon savings.

We would also question the arrangements for new burdens funding, as follows:

- Authorities should be compensated for lost income, based on historical income
- Increased collection costs should be accounted for, and should include all vehicles, staff, containers, overheads, fuel, customer services, communications, and depot provision.

**Q21. How likely are the following options to support the above policy aims?**

|                                                                  | <b>Very likely</b>       | <b>Likely</b>                       | <b>Unlikely</b>                     |
|------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| Provide updated guidance on reasonable charges for garden waste. | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Issue clear communications to non-participating households.      | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Support on increasing home composting (e.g.                      | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

subsidised bin provision).

**Q22. Do you have any further comments on the above options, or any other alternatives that could help to increase the recycling of garden waste and/or reduce the quantity of garden waste in the residual waste stream? Please provide supporting evidence where possible.**

We feel that the first two options; updated guidance on reasonable charges and clear communication for non-participating households, are unlikely to achieve the policy aims.

Garden waste services are priced accordingly to factor in the cost of vehicles, fuel, staff (both collection and admin), the container, and communications. NFDC currently charges above WRAP's £18-£30 suggested price for garden waste subscription. Capping the charge could mean running the service at a loss. Service cost will vary significantly from one authority area to another, depending on issues such as rurality, deprivation etc. This would have to be included in any assessment of reasonable cost.

With regards to clear communications to non-participating households, as mentioned previously there is very little garden waste being disposed of by householders in either kerbside residual or DMR. Therefore, we feel residents are already aware of the right ways to dispose of garden waste, and therefore further progress is unlikely to be made.

We do feel that promotion of home composting is far more likely to achieve the policy aims than the other two options. In Hampshire, authorities promote the national "Get Composting" compost bin scheme as well as offering a limited number of free bins each year. This proved to be very popular during the pandemic and shows that residents do have an appetite for home composting. Research by WRAP has shown that if you can keep supporting residents who buy a recycling bin, they will continue to use it. Compost bins can also be a way for residents to dispose of some food waste.

We would like to be able to offer more free compost bins, and more support to residents who buy/are given them, and resources would be best directed to this rather than providing free kerbside collections.

Composting could also help to achieve policy aims if there was more support for community composting initiatives. This would enable those who only have a small garden to compost their garden waste and again reduces the need for a garden waste service. With funding and more resources, local authorities could help residents set up their own community compost schemes.

#### Proposals on exemptions for the separate collection of two recyclable waste streams from households

**Q23. Could the following recyclable waste streams be collected together from households, without significantly reducing the potential for those streams to be recycled?**

|                   | Agree | Disagree                 | Not sure / don't have an opinion / not applicable |
|-------------------|-------|--------------------------|---------------------------------------------------|
| Plastic and metal | Agree | <input type="checkbox"/> | <input type="checkbox"/>                          |
| Glass and metal   | Agree | <input type="checkbox"/> | <input type="checkbox"/>                          |

If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.

We believe that both plastic and metal and glass and metal can be collected together without it being detrimental to the material quality, where residents follow the clean, dry, loose principle.

**Q24. What, if any, other exemptions would you propose to the requirement to collect the recyclable waste in each waste stream separately, where it would not significantly reduce the potential for recycling or composting?**

We believe that the three streams; plastic, glass, and metal, can be collected together and still retain the quality. There are several authorities (St Albans City and District, Derbyshire Dales) who are in the top of the LetsRecycle.com "league tables", achieving high recycling rates who collect the three together. We believe that the important factor is keeping the fibre (paper and card) separate from other materials to retain the quality of the paper and card stream.

**Proposals on conditions where an exception may apply, and two or more recyclable waste streams may be collected together from households**

**Q25. Do you have any views on the proposed definition for 'technically practicable'?**

The definition for technically practicable refers to "a system which is technically developed and proven to work in practice" however there is no definition of what is meant by technically developed, and whether this links to the 'efficient and effective' as per the extended producer responsibility consultation. Further clarification around this will be needed to help Local Authorities understand if their service can be considered technically developed.

**Q26. Do you agree or disagree that the proposed examples cover areas where it may not be 'technically practicable' to deliver separate collection?**

Agree

Disagree

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

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to.

**Q27. What other examples of areas that are not 'technically practicable' should be considered in this proposal? Please be as specific as possible.**

The demography of the area should also be taken into consideration. Either as a separate example or included in rurality and geography. For example, areas with ageing populations may require more assisted collections which is less efficient and more of a manual handling risk with kerbside sort collections.

We'd also add that the technical assessment should include impact on collection staff, in particular the impact of manual handling and the impact of glass collections on hearing.

**Q28. Do you agree or disagree that the proposed examples cover areas that may not be 'economically practicable' to deliver separate collection?**

Agree

Disagree

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

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to.

**Q29. What other examples of 'economically practicable' should be considered in this proposal? Please be as specific as possible.**

**Q30. Do you have any views on what might constitute 'excessive costs' in terms of economic practicability?**

This is highly subjective, given the different budgets between local authorities, and what might be excessive to one may not be to another. We do not feel that a monetary value should be used to define "excessive", but rather some kind of proportion.

It should also be noted that there will be difficulties for some authorities in trying to model the cost of potential new collection systems, in order to make the necessary comparisons between systems as part of this "TEP+E" analysis. These difficulties could include:

- Lack of resources and expertise to carry out this modelling
- Lack of data to inform the modelling inputs, such as participation rates, pass rates, journey times etc

Government support must be provided to enable authorities to carry out this work and make the best possible long-term decisions for their areas and their residents.

**Q31. Do you have any views on what should be considered 'significant,' in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together?**

This should be based on a proportion, and we would suggest the proportion does need to be significant if it is to trigger a service change. For example, completely overhauling a WCAs collection service, with significant cost and disruption, for the purpose of achieving a very small % improvement in environmental performance, should not be required. We'd suggest that a 25%+ improvement in GHG emissions, for example, would be considered significant.

Whatever measures of environmental benefit are used, they should be measurable, comparable, and consistent across all authorities.

**Q32. Do you agree or disagree that the proposed examples for 'no significant environmental benefit' are appropriate?**

Agree

Disagree

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

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to.

Whilst the 4 examples listed are all relevant, what is not clear is how these factors would be considered together to provide one overall assessment of “significance”. E.g. if separate collection led to a significant reduction in reject tonnage but significant increase in vehicle emissions, which factor would be considered to take priority? Detailed guidance will be needed in order to help authorities assess this, and we would reiterate the following point –

It should also be noted that there will be difficulties for some authorities in trying to model the environmental impact of potential new collection systems, in order to make the necessary comparisons between systems as part of this “TEP+E” analysis. These difficulties could include:

- Lack of resources and expertise to carry out this modelling
- Lack of data to inform the modelling inputs, such as participation rates, pass rates, journey times etc

Government support must be provided to enable authorities to carry out this work and make the best possible long-term decisions for their areas and their residents.

Whatever measures of environmental benefit are used, they should be measurable, comparable, and consistent across all authorities.

**Q33. What other examples of ‘no significant environmental benefit’ should be included in this proposal? Please be as specific as possible.**

The use of kerbside sort for recycling results in higher carbon emissions than twin stream, this is because more vehicles are required to deliver the same service. Kerbside sort vehicles require a greater number of miles to be driven per tonne of material collected ([Technical report templates \(eunomia.co.uk\)](http://eunomia.co.uk)) This consultation document states that the preference is for kerbside sort, however this is certainly not the case for all authorities as the Eunomia report shows, and research by WRAP has shown there is very little difference in recycling performance between twin stream and kerbside sort collections. Therefore, there is a balance to be had between the collection method and effect on recycling performance.

#### Proposals on compliance and enforcement

**Q34. Do you agree or disagree that local authorities should only be required to submit a single written assessment for their service area?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

**Q35. What other ways to reduce the burden on local authorities should we consider for the written assessment?**

Difficult to say at this time given the lack of detail on what will be required in the written assessment. However, we strongly agree that those in partnerships or in two-tier authorities should be able to complete a single assessment.

We would also like to point out challenges around timelines. Councils with a large amount of service change to implement to allow for the ramifications of DRS, EPR and consistency, will need to make decisions about future service configuration very soon. It may well be that these long-term decisions are made before the full details of the requirements for this written assessment are known. We would urge Government to ensure full clarity as soon as possible to aid decision making.

**Q36. What factors should be taken into consideration including in the written assessment? For example, different housing stock in a service area, costs of breaking existing contractual arrangements and/or access to treatment facilities.**

We believe that the factors under “technically”, “economically” and “environmentally” will cover most of the requirements. However, the following should also be considered:

- health and safety should be added as a factor, as kerbside sort involves lifting multiple containers which has a far greater health and safety risk than other methods of collecting DMR. Although quality of recycling is important it shouldn't be to the detriment of waste collection crews. Separate collection of glass cannot be achieved without significant impact on hearing.
- All the measures in this consultation are going to affect residents, however they are very rarely considered. The easier and more convenient recycling is, the more likely a resident will engage and participate, and this should be a big consideration as no amount of comms or data will sway a resident to recycle if they find their local service too complex or inconvenient
- Finally, impact upon street appearance should be considered, that is the impact of multiple containers on the street on or around collection day.

**Q37. Do you agree or disagree that reference to standard default values and data, which could be used to support a written assessment, would be useful?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

We would like further information on how the standard values and data might link to the EPR family groupings and whether these impact on what is considered as an 'effective and efficient system'.

We would also like further information on how standard default values and data would be calculated before we can consider how useful they would be. Even in Hampshire, which is just one county there is so much variation between authorities in terms of size, and budgets, there isn't a 'standard' across Hampshire, and this will be further amplified when you consider the other local authorities across England.

**Q38. Do you agree or disagree that a template for a written assessment would be useful to include in guidance?**

Agree

Disagree

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



If you disagree, please provide the reason for your response.

We do think that a template for a written assessment would be useful for guidance, but there needs to be space for free text. We would also return to the issue of timescales. In order to meet requirements in 2023, local decisions need to be made in the very near future. Guidance, templates, and forms need to be provided as soon as possible.

#### Proposal on minimum service standards for the separate collection of dry recyclable materials from households

**Q39. Do you agree or disagree with Proposal 13, particularly on the separation of fibres from other recyclable waste streams and the collection of plastic films?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

We agree that fibres should be collected separately to retain their quality and would agree with guidance to say that. However, we feel that it should be up to each authority how they see fit to collect plastic film depending on their sorting facilities as to what would work best.

#### Proposal on non-statutory guidance

**Q40. Which service areas or materials would be helpful to include in non- statutory guidance?**

In the Waste Prevention Plan consultation, it mentions guidance and information notes for Local Authorities on best practice for reuse, and non-statutory guidance on WEEE, this could be the area where that guidance is incorporated. We would also like to see the same guidance on other material types such as bulky waste, textiles, nappies, and batteries. For the majority of those materials we would like guidance to help promote waste prevention and move those items up the waste hierarchy, and the guidance on batteries would be helpful due to the fire risk.

#### Proposals on Review of Part 2 of Schedule 9 of the Environmental Permitting Regulations 2016

##### Proposal 15

**Q41. Do you have any comments on the recommendations from the review of the Part 2 of Schedule 9 of the Environmental Permitting Regulations?**

Given the additional sampling that will be necessary as part of EPR obligations, it seems sensible to review Materials Analysis facilities. The recommendations suggest more reporting, and the burden of this needs to be considered against the additional reporting that will be required under EPR.

**Q42. If amendments are made to Part 2 of Schedule 9, do you agree or disagree that it is necessary to continue to retain requirements to sample non-packaging dry recyclable materials?**

Agree

Disagree

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

Please provide the reason for your response where possible.

## Proposals on recycling credits

### Proposal 16

**Q43. Do you agree or disagree that provision for exchange of recycling credits should not relate to packaging material subject to Extended Producer Responsibility payments?**

Agree

Disagree

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

Please provide the reason for your response.

**Q44. In relation to recycled waste streams not affected by Extended Producer Responsibility or which are not new burdens we are seeking views on two options:**

**Option 1** Should we retain requirements for Waste Disposal Authorities to make payment of recycling credits or another levy arrangement with Waste Collection Authorities in respect of non-packaging waste?

**Option 2** Should we discontinue recycling credits and require all two-tier authorities to agree local arrangements?

|          | Agree                    | Disagree                 | Not sure / don't have an opinion / not applicable |
|----------|--------------------------|--------------------------|---------------------------------------------------|
| Option 1 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>                          |
| Option 2 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>                          |

**Q45. Where local agreement cannot be arrived at what are your suggestions for resolving these? For example, should a binding formula be applied as currently and if so, please provide examples of what this could look like.**

Unsure. However, given the government's desire to drive waste back up the hierarchy as per the aims of the Waste Prevention Plan Consultation, perhaps Government could consider whether there are alternative financial models that should be put in place instead of recycling credits or a similar scheme, where local agreements cannot be met.

## Part 1 – Measures to improve the recycling of non-household municipal waste from businesses and non-domestic premises

### Dry Recycling

**Q46. Do you agree or disagree that waste collectors should be required to collect the following dry materials from all non-household premises for recycling, in 2023/24?**

|                                         | Agree – this material can be collected in this timeframe | Disagree – this material can't be collected in this timeframe | Not sure/don't have an opinion/not applicable |
|-----------------------------------------|----------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------------|
| Aluminium foil                          | ✓                                                        |                                                               |                                               |
| Aluminium food trays                    | ✓                                                        |                                                               |                                               |
| Steel and aluminium aerosols            | ✓                                                        |                                                               |                                               |
| Aluminium tubes e.g. tomato puree tubes | ✓                                                        |                                                               |                                               |
| Metal jar lids                          | ✓                                                        |                                                               |                                               |
| Food and drink cartons e.g. TetraPak    | ✓                                                        |                                                               |                                               |

**Agree with all should be consistent with household.**

If you disagree with the inclusion of any of the materials above in the timeframe set out, please provide the reason for your response and indicate which dry recyclable material you are referring to.

**Q47. Some waste collectors may not be able to collect all the items in the dry recyclable waste streams from all non-household municipal premises in 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date?**

Collection contracts

Sorting contracts

MRF Infrastructure capacity

Cost burden

Reprocessing

End Markets

Other (Please specify)

**Please provide the reason for your response and indicate how long waste collectors require before they can collect all these materials.**

All of the circumstances listed will have a bearing on the ability of waste collectors to be able to collect the items in the dry recyclable waste stream from all non-household municipal premises in 2023/24, and this needs to be considered with the timescale being quite short already.

The additional set of materials will escalate costs as more vehicles will be needed, and some of these will need to be specialised to cope with collecting materials separately and collecting from businesses in narrow inner-city areas. More vehicles also mean more drivers, and we know that there is a shortage of drivers in the UK currently.

Waste collectors will face the same contract issues as those for municipal, both for collection, and sorting, and these will also incur a cost burden.

There are likely to be capacity issues at MRFs, with the increase in materials collected at households, plus the increased requirements for non-household premises to collect the same materials, there will be a large increase in the volume of material going to existing infrastructure, which was not designed and built to handle such a range of materials and such volume. There will need to be investment in infrastructure across the country to ensure that all items collected can be sorted, and the capacity is available.

Additionally, as mentioned previously there needs to be the reprocessing and end markets for all these materials available otherwise trust in the service will be lost.

**Q48. Do you agree or disagree that collections of plastic films could be introduced by the end of 2024/25 from non-household municipal premises?**

Agree

Disagree

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

If you disagree, please provide the reason for your response and any evidence as to why this would not be feasible.

The deadline should be the same as for household plastic films collections. This consultation is for consistency, but different deadlines for the same material is not consistent, and residents will be confused as to why something they are not able to recycle at home can be done so at work. Residents quite often place blame on local authorities when there are such inconsistencies, and if residents can recycle plastic film at work but not at home, they will contact their local authority to ask why this is the case.

As with the response for plastic films collected from households, the government need to ensure there are markets and infrastructure to manage plastic film before it is introduced for recycling, otherwise public confidence in recycling will be damaged.

**Q49. Do you have any other comments on this proposal? For example, please specify any barriers that may prevent collectors delivering these services.**

Although we agree with the consistent approach across households and businesses, we also feel that more work needs to be done to understand the variances in waste and recycling that is generated by businesses compared to household. This will help to understand where there are further opportunities for business waste recycling.

**Q50. Do you agree or disagree with Proposal 19?**

Agree

Disagree

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

**Q51. Do you have any other comments on the use of these technologies and the impact on costs to businesses and recycling performance?**

No

**Q52. What are the main barriers that businesses (and micro-firms in particular) face to recycle more?**

|               | Large Barrier | Some Barrier | Low/no barrier |
|---------------|---------------|--------------|----------------|
| Communication | A             |              |                |
| Financial     | A             |              |                |

|                                      |   |   |   |
|--------------------------------------|---|---|---|
| Space                                | A |   |   |
| Engagement                           |   | A |   |
| Drivers to segregate waste           |   |   | A |
| Location                             |   | A |   |
| Enforcement                          |   |   | A |
| Variation in bin colours and signage |   |   | A |
| Contractual                          |   |   | A |
| Staff/training                       |   | A |   |
| Other                                |   |   |   |

If you have selected other above, please specify.

Please provide any comments on how these barriers can be overcome.

Businesses can have far more say on what is and isn't acceptable in a working environment and will be able to give far more robust messaging to those not recycling properly than local authorities are able to do with residents. The consistency in recycling at home and work will help to change people's behaviour.

The cost of collections will be a barrier, especially for those smaller businesses. However, if methods such as those in the collaborative procurement section can be undertaken by several small businesses, this will help to ease the cost burden.

**53. Should micro-firms (including businesses, other organisations and nondomestic premises that employ fewer than 10 FTEs) be exempt from the requirement to present the five recyclable waste streams (paper & card, glass, metal, plastic, food waste) for recycling? Please select the option below that most closely represents your view and provide any evidence to support your comments.**

Yes – all micro-firms should be exempt from the requirement – Option 1

No – but all micro-firms should be given two additional years to comply with the new requirements in the Environment Bill (i.e. compliant in 2025/26)

No – all micro-firms should be required to present these waste streams for recycling, from the 'go live' date in 2023/24.

**Q54. Should any non-household municipal premises other than micro-sized firms be exempt from the requirement? Please provide evidence to support your comments.**

No – consistency is the key. If it applies to one person in a studio flat what is the difference in a micro business.

**Waste franchising / zoning**

**Q55. Which recyclable waste streams should be included under a potential zoning scheme?**

For each option, please select either agree, disagree, or not sure / don't have an opinion / not applicable.

Dry recyclable waste streams (glass, metal, plastic, paper, and card) **agree**

Food waste **agree**

Other items e.g. bulky office waste (please specify) **agree**

**Q56. Which of the below options, if any, is your preferred option for zoning/collaborative procurement? Please select the option that most closely aligns with your preference**

- Encouraging two neighbouring businesses to share the same containers under contract
- Encouraging businesses to use shared facilities on a site/estate
- Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in)
- Co-collection – the contractor for household services also deliver the non-household municipal services
- Framework zoning – shortlist of suppliers licensed to offer services in the zone
- Material specific zoning – one contractor delivers food, one for packaging, one for refuse collection services
- **Exclusive service zoning – one contractor delivers the core recycling and waste services for the zone**
- None of the above

**Q57. Do you have any views on the roles of stakeholders (for example Defra, the Environment Agency, WRAP, local authorities, business improvement districts, businesses and other organisations and chambers of commerce) in implementing a potential zoning or franchising scheme?**

For example, do you think there could be roles for one or more of these organisations in each of the following activities:

- **Procurement**
- **Scheme design**
- **Administration and day to day management**
- **Enforcement**
- **Business support**
- **Development of tools and guidance**
- **Delivery of comms campaigns**
- Any other activities (please specify)

If you think that there is a role for any other stakeholders, please specify.

Please provide explanations where possible to support your above response.

**Q58. Do you have any further views on how a potential waste collection franchising / zoning scheme could be implemented?**

**no**

**Collaborative procurement**

**Q59. Do you have any views on how Government can support non-household municipal waste producers to procure waste management services collaboratively? This could include working with other stakeholders.**

**no**

**Business support**

**Q60. Which type(s) of business support would be helpful? (Select any number of responses)**

- 1:1 support
- National regional campaigns
- National guidance and good practice case studies
- Online business support tools (e.g. online calculators and good practice guidance)
- Other (please specify)

**Commercial waste bring sites**

**Q61. Are there any barriers to setting up commercial waste bring sites, and do you find these sites useful?**

We do not feel that waste bring sites would be utilised that much, as having waste collected from your property is far more convenient than taking it elsewhere. Additionally, if businesses are already paying a waste collector, they will want to use this service as much as possible unless they are paying by weight in which case they may prefer to take things elsewhere. In Hampshire the Household waste recycling centres are already available for business use, as a chargeable service.

Separate commercial waste bring sites would need to be monitored to avoid abuse.

**Q62. Could the following recyclable waste streams be collected together from non-household municipal premises, without significantly reducing the potential for those streams to be recycled?**

|                   | Agree | Disagree | Not sure/don't have an opinion/not applicable |
|-------------------|-------|----------|-----------------------------------------------|
| Plastic and metal | ✓     |          |                                               |
| Glass and metal   | ✓     |          |                                               |

If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.

**Q63. What, if any, other exemptions would you propose to the requirement to collect the recyclable waste stream in each waste stream separately where it would not significantly reduce the potential for recycling or composting?**

As with household waste, we also feel that plastic, glass, and metal could be collected together if necessary.

**Q64. Do you have any views on the proposed definition for 'technically practicable'?**

See answer to Q25

**Q65. Do you agree or disagree that the proposed examples cover areas where it may not be 'technically practicable' to deliver separate collection?**

Agree

Disagree

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

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

**Q66. What other examples of areas that are not ‘technically practicable’ should be considered in this proposal? Please be as specific as possible.**

See answer to Q27

**Q67. Do you agree or disagree that the proposed examples cover areas that may not be ‘economically practicable’ to deliver separate collection are appropriate?**

Agree

Disagree

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

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

See answer to Q28

**Q68. What other examples of ‘economically practicable’ should be considered in this proposal? Please be as specific as possible.**

Size of business – i.e. number of FTE

See answer to Q29

**Q69. Do you have any views on what might constitute ‘excessive costs’ in terms of economic practicability?**

See answer to Q30

**Q70. Do you have any views on what should be considered ‘significant,’ in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together?**

See answer to Q31

**Q71. Do you agree or disagree that the proposed examples for ‘no significant environmental benefit’ are appropriate?**

Agree

Disagree

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

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

See answer to Q 32

**Q72. What other examples of ‘no significant environmental benefit’ should be included in this proposal? Please be as specific as possible.**

See answer to Q33



**Proposal 25**

**Q73. What ways to reduce the burden on waste collectors and producers should we consider for the written assessment?**

Unsure.

**Q74. We are proposing to include factors in the written assessment which take account of the different collection requirements, for example, different premises within a service area. What other factors should we consider including in the written assessment?**

The size of the businesses as this will affect the amount of waste that is being produced, additionally information on the types of businesses as this will impact on the types of waste and recycling they are generating.

**Q75. Would reference to standard default values and data, that could be used to support a written assessment, be useful?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

**Q76. Do you agree or disagree that a template for a written assessment would be useful to include in guidance?**

Agree

Disagree

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

If you disagree, please provide the reason for your response.

**Q77. Do you agree or disagree that the proposed approach to written assessments and non-household municipal collections will deliver the overall objectives of encouraging greater separation and assessing where the three exceptions (technical and economical practicability and environmental benefit) apply?**

Agree

Disagree

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

**Q78. Do you have any comments and/or evidence on familiarisation costs (e.g. time of FTE(s) spent on understanding and implementing new requirements) and ongoing costs (e.g. sorting costs) to households and businesses?**

No

**Q79. Do you have any comments on our impact assessment assumptions and identified impacts (including both monetised and unmonetised)?**

No