

Department for Environment Food & Rural Affairs
Consistency in Household Recycling Consultation
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Ref: LBB-DEFRAConsistencyCons
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Sent by e-mail - recycling@defra.gov.uk

Dear Sir/Madam

RE: London Borough of Barnet response to the second Consultation on Consistency in Household and Business Recycling in England.

Please find attached the London Borough of Barnet's (LBB) response to the second consultation on consistency in household and business recycling in England. This letter is provided in support of the consultation template and is intended to highlight the key issues and observations for your consideration when reviewing the consultation response.

Local Operational Flexibility

LBB supports the objective of the consultation and the aim of improving recycling levels and the quality of recyclable material presented for collection. However, the council would request that government incorporates sufficient flexibility within any future statute or regulatory guidance to allow those authorities that have proven collection solutions which cater to local needs and successfully produce quality recyclable materials to retain those operating models. The council disagrees with some of the core assumptions within the consultation and in particular the assertion that co-mingled collection solutions lead to poor quality recyclable materials.

Our Materials Recovery Facility currently favours UK outlets for recyclable materials, contamination is being managed and the current comingled collection service is delivering a high quantity and good quality of materials to end markets.

Waste collection authorities require the ability to determine the most practicable method for providing their services, whilst meeting the core principles included within this consultation. Local authorities should be able to determine whether this be through a kerbside co-mingled or separate collection service for recycling, including the disposal methods.

It is important to ensure that collection arrangements are easy for residents and customers to use, so as to maintain and enhance participation. Implementing the requirements of the model proposed within the consultation (particularly at flats) will bring additional challenges which will need continuous resourcing and pose the risk of increased contamination.

Operational Depot Capacity

LBB does not currently have sufficient depot capacity to accommodate the increased fleet and waste transfer needs associated with the proposed model. Acquiring land for waste depot use is a particular challenge within a London borough, where there is limited available land and the cost is high. Once acquired it is likely that remedial works would need to take place to ensure it is fit for purpose. The timeline for this process is unknowable at this stage, but the previous experience of our recent move to Oakleigh Depot suggests this is unlikely to be completed within the timeline detailed within the consultation.

Financial Implications

LBB would incur significant costs if it were required to transition from a co-mingled service to a kerbside separated collection. These would include the replacement and increase in number of vehicles, need for more staff including skilled drivers, additional depot space and amendments to sorting and disposal facilities.

The principle of new burdens funding to cover new and/or additional costs incurred by Local Authorities arising from policy decisions and/or statutory obligations made by Government is welcome. However, local authorities will require new burdens funding to cover the true implementation and ongoing costs associated with the proposals including any loss of revenue.

Garden Waste Collections

LBB's experience suggests that the government's assumptions regarding increased garden waste contamination of the residual waste stream as a result of charging for green waste collections are incorrect. This is evidenced by supporting information from the North London Waste Authority and a study conducted by ADEPT covering nine London boroughs indicating that there is a lower amount of garden waste in the refuse stream when the service is chargeable (average London 3.14%), when compared to a free service (average London 4.12%).

Similarly, the suggestion that subscription garden waste services generate lower waste yields than a free service is not correct. The council's local data shows that the council has a yield of 312KG per household under a chargeable service, compared with 208KG per household with a previous free service. Local data shows that quarter two of the first year of a chargeable garden waste service returned circa 75% of the tonnage from the previous year under a free service, increasing to circa 115% in quarter three. Approximately 56% of the properties previously serviced by the council's free service have signed up to the new chargeable service.

Street Scene Impact

Any changes to services that result in an increase in the number of bins/containers required will have a detrimental effect on the street scene, and the positive perceptions of residents, businesses, and visitors of Barnet as a clean and well-run London borough. This would particularly apply to roads with terraced houses, properties with no frontage, flats and service alleys behind High Street shops and businesses. An increase in street scene issues and complaints will result in additional costs and resource requirements for the council in mitigating these.

Health & Safety

LBB is concerned that health and safety implications for collection operatives and service users have not been considered in the development of the proposals or highlighted in the consultation questions. The use of smaller containers can present manual handling concerns, and services should be designed to minimise lifting by operatives. Containers used for collections should be of sufficient size for the waste stream that is to be collected, and these should be designed to be wheeled to the collection vehicle to reduce the risk of musculo-skeletal injury. In addition, service users may also be affected by the same health and safety considerations, particularly where their containers need to be moved from a storage point to the kerbside ahead of each collection.

LBB asks that the above comments are fully taken into consideration when reviewing the responses and formulating the government's position on the proposals.

If you require any further information from the London Borough of Barnet please do not hesitate to contact me.

Yours faithfully



Geoff Mee
Executive Director, Environment