

Response ID ANON-JJ98-ZPH-Y

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

Submitted on **2019-05-13 16:10:26**

Introduction

1 Would you like your response to be confidential?

No

2 What is your name?

Name:

Jamie Blake

3 What is your email address?

Email:

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4 What is your organisation?

Please provide further comments :

local authority

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

London Borough of Barnet

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 :

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

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

Lack of available and appropriate space for containers is a major constraint in offering comprehensive separated recycling services to flats, houses in multiple occupation and flats above shops.

For most residents to adopt recycling it must be easy and convenient. Flats can be particularly challenging, they can frequently have insufficient storage capacity, both internally and externally for segregation of waste streams. Where bin storage is limited increased frequency of collections are required which can have challenging operational issues. More frequent collections for flats will alter the costs associated with delivering the services to them and increase the costs overall. Going forward we would want to see stronger policy in place that ensures suitable storage for containers is allocated at flats and HMOs

Where there is shared use of bins, there tends to be less ownership of the waste. If the recycling stream is seen to be contaminated this can be demotivating to correctly recycle. Identifying those responsible to allow appropriate action to be taken and achieve long term behavioural change for all the residents is difficult in these circumstances.

Flats and HMO's require liaison with multiple stakeholders such as Landlords, housing associations and management agents requiring additional resources to reach all stakeholders. This not only can be time consuming, but also puts additional financial burdens on local authorities.

Flats and HMOs are regularly occupied by transient populations which are harder to engage with. English may not be the first language of the occupiers of these properties and different cultures can provide additional barriers. Some of this housing type can also be in parts of a local authority area that has other issues that the authority is trying to address and so makes recycling lower down the priority list for residents.

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 :

Regular engagement and communications are needed, especially in areas with transient populations.

High contamination levels and associated high costs of providing the recycling service to these properties may require the core materials to be reconsidered and a modified waste service provided, which may not include all of the core materials. The ability to explicitly charge householders or managing agents for the collection and differential treatment costs of waste set out not in conformity with a EPA s46 notice or additional collections where necessitated by their actions or

building constraints, are necessary.

Collections from flats and HMOs often need more capital works on site for the bins to be placed in the first instance. There are often high ongoing costs related to communications linked to contamination and in some cases clearing up or sending loads to residual treatment due to contamination. These are costs that might not be considered in normal collection costs but are costs we are incurring in servicing these types of properties.

Some of the storage issues and access to waste compounds could be mitigated through stricter National Planning Policy, specifying minimum design requirements to allow for waste to be separated and stored within dwellings and waste compounds and for easy access to disposal/recycling points.

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 :

The core set of materials must be based on a comprehensive sorting and end market infrastructure (including exports) being available. If this is not the case for a material it should not form part of the core set.

We agree in principle to collecting a core set of materials but the practical achievement of collecting the core set of materials and providing a consistent service will depend on local circumstances and the infrastructure and proximity of processing and treatment facilities. The complexity of providing a consistent collection service in densely populated urban areas should not be under-estimated.

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 but phased in

tick - plastic bags and film:

Should be included in the core set but phased in

12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

Please provide further comments :

We currently collect food and drinks cartons. In the core set of materials we only support the phased inclusion of food and drinks cartons if viable end markets and sorting infrastructure is in place and the phased introduction of plastic film if suitable sorting and reprocessing facilities are available with viable end markets, providing full geographical coverage which can guarantee the material is recycled. Without secure markets residents can lose confidence in the collection system and potentially cease recycling of all materials.

Plastic bags and film can be particularly challenging as compostable bags are becoming more widespread and many MRFs cannot sort plastic bags/film. Even where a recycling opportunity exists for these materials they are not readily identified as different materials by the resident and if not appropriately labelled has the potential to contaminate the waste streams. It will therefore be important to gain the views of MRF operators as to the ability to add these items nationwide. In the future the core set of materials could be expanded to include other streams such as household batteries, which we currently collect from the kerbside.

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 :

We would expect that the include of additional items for collection should be financially supported through additional EPR arrangements to enable local authorities to provide appropriate services.

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

Please provide further comments :

No.

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 :

No additional materials should be added without a clear case that their addition does not add excessive cost, and long term markets for the material are available. The adding in of additional materials to the core set needs to be fully funded for all local authorities, both the transitional costs in adding the materials, and the long term collection costs.

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:

Disagree

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

Disagree

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:

Disagree

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

Yes - please provide further details in the box below

Please provide further comments :

Yes there are circumstances where it would not be practical to provide a separate food waste collection.

Flats – many flats both old and new have limited storage both internally and externally for multiple waste streams. In addition the service is much more costly to provide as: more regular communications are required due to the transient population of some flats; officer time as there are more parties involved such as residents, caretakers and managing agents; and collection costs as the service is not as efficient due to the spread of flats around the borough. Based on our experience the food waste collected is generally higher contaminated than that collected from houses, so overall there is a lower yield for a higher cost.

Flats above shops – these properties are very difficult to provide a food waste service for as it is often very difficult for them to have reusable containers for their food waste, as they have no frontage. For other materials such as dry recycling they use single use containers and present these on the high street, but this is not possible for food waste.

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

Please provide further comments :

The priority in relation to food waste should be to reduce the amount that is generated, by carrying out waste prevention. National resources should continue to be put into campaigns to promote this message, that are informational and motivational.

In the consultation's proposals for separate food waste collection, comparisons in performance are made between sending food waste to landfill and send food waste to anaerobic digestion. No reference is made to sending food waste to an energy from waste facility. As most local authorities no longer use landfill as their main disposal route the consultation should compare food waste sent to an energy from waste facility to other alternative options.

The waste hierarchy that is used by DEFRA in England and in the London Environment Strategy is: prevention, preparation for reuse, recycling, other recovery and disposal. "Other recovery" includes anaerobic digestion and incineration with energy recovery, and does not rank one above the other. In addition our research has not found any scientific evidence that places anaerobic digestion above incineration with energy recovery. We therefore believe there should be no requirement to collect food waste separately, where residual waste is sent to incineration with energy recovery.

We agree with North London Waste Authority's response to this consultation question which states "However, we also recognise that it may not be easy to provide a cost-effective food waste collection service, particularly in flats where residents may struggle for indoor space for separate containers and where the physical barriers to participation may result in low participation rates. Although we also recognise that there are city authorities which have already overcome these barriers, any requirement for separate food waste provision will need adequate resourcing and a formula which recognises the relatively high costs of providing this service in dense urban areas.

Having noted the physical complexities of separate food waste collections, the Authority also notes that in some situations:

- a) the economic case for food waste collections may be difficult to justify, and
- b) the residual waste collection service will be depositing at a modern thermally efficient Energy-Recovery-Facility (ERF) i.e. potentially little different in environmental terms from anaerobic digestion,

In such cases we suggest that authorities should be able to request support from WRAP or Resource London/LWARB to assist in the development of a locally appropriate food waste strategy. This strategy should take account of the net cost to the local authority, current and likely future participation levels as well as the benefits of introducing, retaining and/or extending an existing food waste service. “

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)

Specific financial support (please specify), Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers), Communications support, (e.g. free collateral that can be adapted and used locally), Technical support, (e.g. free advice from a consultant about round re-profiling), Other (please specify ...)

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

Please provide further comments :

Financial support – needs to cover the real transitional and operational costs of providing the service to houses, flats, and flats above shops. Transitional costs will include: costs of starting the services such as communications, officer time, containers (internal and external), vehicles and modifications to transfer stations. These costs will be incurred before the start of the service, and as a significant number of new properties are forecast to be built in the borough in forthcoming years.

Operational costs relate to the ongoing provision of the service and include: vehicle running costs, staff, depot costs, communications, container replacement and enforcement.

Proposal 6

23 What are your views on this proposal?

Please provide further comments :

This may be necessary in the short term. However this decision should not be taken without considering existing collection vehicle depreciation cycles, transfer station capacity and existing waste collection contracts.

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:

Disagree

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):

Disagree

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

Agree

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

Disagree

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

Please provide further comments :

In line with the polluter pays principle, if a local authority wishes to do so, it should be able to charge householders for the collection and disposal of their garden waste, if they have a garden and if they wish to use the service.

If government is concerned about the level of charging across the nation then an upper price limit could be set for a single emptying of a 240 litre bin on a fortnightly basis for a year.

Proposal 8

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

Not sure / don't have an opinion

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 :

As a London borough that previously collected source separate material and moved to a comingled collection service in October 2013 it will be a very difficult message to communicate to residents. With the change to a comingled collection service in 2013 the collection service has been made easier to use, and the tonnage collected has increased.

In addition our transfer station that we built in 2017 within our depot, and successfully obtained an Environmental Permit for, does not have the capacity to collect two or three stream dry recyclables. To build a transfer station with the capacity to collect two or three stream dry recyclables would incur significant expense in purchasing land and construction. Due to land constraints this would not be possible within our existing depot, thereby adding additional costs to the collection service who would need to travel further.

In addition we are currently in the middle of a fleet replacement programme and our new fleet is based on the collection service we introduced in 2013. The new fleet have an expected life cycle of 7 years, therefore the next cycle of fleet replacement will not start until 2025 onwards.

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

Please provide further comments :

We believe it should be at the local authority's discretion to determine which collection method is considered most appropriate for its area. It is very difficult to specify a single service type and frequency which would be appropriate for all properties and areas.

Proposal 9

29 Do you agree or disagree with this proposal?

Not sure/no opinion/not applicable

30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

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

Please provide further comments :

31 Do you have any other comments about Proposal 9?

Please provide further comments :

Standardisation would depend on whether a co-mingled, twin stream or source segregated service is applied. There could be a standardised colour for residual, dry recycling, garden and food waste.

Whilst there could be marginal benefits in standard colours the scale, costs and pace of a change will be a big barrier to any sort of implementation, and it will be years before the results start to show any potential benefits.

An alternative could be a method of alpha numeric codes linked to the approved list that could appear on labels on items and then on containers as well. These could be incorporated relatively easily to new containers and retrospectively to existing containers.

Proposal 10

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

Not sure/ no opinion/ not applicable

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?

Not sure/no opinion/not applicable

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

Please provide further comments :

The frequency of residual waste collections should not be prescribed, thereby allowing local circumstances to be considered. We believe that this is a matter for

local authorities, based on their local democratic mandate.

Proposal 11

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

Please provide further comments :

National tools can be helpful to provide a consistent message and can provide good promotional/educational material for local authorities to easily access. If the core materials are adopted national communications will be especially relevant as they could be adopted for all local authority use. We would like the tools to be expanded to include those that effectively target harder to reach segments of the population. It would also be helpful if materials were allowed to be localised.

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

Please provide further comments :

Information needs to be readily available through a variety of media and easy to understand. Information which is targeted with tailored messages, such as to certain age groups or social groups where the message is relevant to them have been found to be more successful than generic messaging. The information needs to be informational, motivational and at times with enforcement messages.

Information also needs to be regularly provided as residents can often revert to old behaviours and prompts can assist in enforcing the message.

All of these will be easier to use and have more impact if products are made from consistent materials and have better labelling.

Proposal 12

38 Do you agree or disagree with this proposal?

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

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

Please provide further comments :

No.

Proposal 13

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

Please provide further comments :

EPR and DRS will move market risk from local authorities to producers, and producers are better able to influence those markets through purchasing power and standardisation of packaging materials. We recognise the consistency proposals are likely to generate additional recycling, although we are concerned about the degree to which stable markets will be created. Additional material could stimulate the markets, however it is questionable as to whether this will be enough to stabilise the markets and provide security for new investment, especially in local markets.

Stable local markets ideally need to be in place before councils change the services. If residents are to have confidence the materials they segregate are being appropriately recycled, end markets must be available. If no market is available for the recycle resident confidence will fall and long-term behavioural change will be harder to build if confidence in the council's ability to recycle is lost.

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 :

Agree.

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

Disagree (please explain why in the box below)

Please provide further comments :

We do not believe garden waste should be included as an indicator, as it is not comparable between authorities, particularly in urban environments.

We do not believe food waste should be included as an indicator, as if food waste is collected separately then efforts should be made to reduce the quantity, in line with the waste hierarchy where prevention is at the top.

We support indicators on dry recycling and residual waste. Of these residual waste is the most important as it can reflect waste minimisation efforts. Consideration should be given to producing these indicators by service type such as street level properties and flats to create a more meaningful dataset.

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 :

We support the principle of introducing non-binding indicators where reporting information is readily available from existing sources. There is opportunity for this to be provided through modifications to WasteDataFlow. If there is to be an increase in data collection requirements this could outweigh the benefits of benchmarking for these additional indicators and would not be supported.

We would expect any costs associated with collection of data for new indicators to be treated as a new burden and supported accordingly.

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 :

We support the proposal to increase non-weight metrics. Any new targets introduced must support and be consistent with the weight-based targets and align with any targets expected of local authority collections and ensure quality and quantity targets are compatible.

Comprehensive research is required to determine the lifecycle assessment and carbon impact of reusing/recycling/composting certain materials. Systems such as WasteDataFlow could be pre-populated to calculate for local authorities the environmental impact of the services that they provide. This could be modelled alongside the current statutory quarterly submissions to develop the evidence base.

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 :

Barriers can include:

- Clarity of vision, objectives, governance, management of services and differing contract expiry dates.
- The need for long term commitment.
- Political changes and local political differences.
- Different financial positions of authorities and lack of resources to commit to the partnership.
- A changing legislative landscape and ability to “vary” the partnership similar to that which would be enacted for a contract.
- Equitability can be difficult to achieve and maintain, savings from one party may be to the detriment of another.
- Different contract periods can make the possibility of joint working difficult.

49 How might Government help overcome these barriers?

Please provide further comments :

Partnership working will develop organically where it is appropriate and workable based on local decisions. Central government does however have a role to play in making the interaction between the parties in two tier arrangements clearer and more conducive to shared objectives. An example is clarifying the future role of Joint Municipal Waste Strategies.

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 :

The requirements on separation should be set at a local level by local government as an enforcement body, so they conform with the same requirements on householders in the area and take into account the waste produced by local businesses.

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

No – some exceptions are needed for particular circumstances (please provide examples below)

Please provide further comments :

Space constraints mean that segregation will not always be possible, but it should be the default with the local authority then deciding whether it is possible.

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

No

Please provide further comments :

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 :

No further comments.

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?

Disagree (please explain in the box below)

Please provide further comments :

The waste hierarchy that is used by DEFRA in England and the London Environment Strategy is: prevention, preparation for reuse, recycling, other recovery and disposal. "Other recovery" includes anaerobic digestion and incineration with energy recovery, and does not rank one above the other. In addition our research has not found any scientific evidence that places anaerobic digestion above incineration with energy recovery. We therefore believe there should be no requirement to collect food waste separately, where residual waste is sent to incineration with energy recovery.

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 :

We do not support a minimum threshold as we believe this would create a significant administrative burden and be difficult to enforce. We are concerned compliance would fall to local authorities, creating an additional financial burden which would require to be fully funded.

We do believe however that local authorities are in a good position to enforce waste separation requirements on business if funds from EPR were allocated to business waste education and enforcement officer type roles.

58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

Please provide further comments :

No.

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

Please provide further comments :

Businesses where food is the core business, i.e. produced or prepared for consumption either on or off site. This should include processing and packaging

businesses in addition to restaurants, cafés and takeaways. In addition, businesses where employees bring their own food on to the site and are likely to generate enough food waste to justify a collection should also be included.

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

No

Please provide further comments :

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

Please provide further comments :

The priority in relation to food waste should be to reduce the amount that is generated, by carrying out waste prevention. National resources should continue to be put into campaigns to promote this message, that are informational and motivational.

Proposal 19

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

Please provide further comments :

We support the principle of supporting small and micro businesses to implement recycling collections. The consultation acknowledges that business waste data is limited, although it is likely that substantial recycling tonnages can be obtained from these business types. There should be no new cost burdens on local authorities.

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

Please provide further comments :

None that we are aware of.

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 :

Funding support could be made available to businesses to receive advice to assess the current waste streams and evaluate how recycling can be maximised which should be combined with consideration on the potential for reductions and reuse. Local authorities are well placed to undertake support and enforcement of business waste collection and segregation issues if they are properly financed to do this.

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 :

For wider environmental targets to be achieved businesses should receive the same scrutiny and objectives as local authorities. Businesses should be required to report recycling rates in a manner which is consistent with local authority reporting requirements. For this information to be transparent a new reporting system may need to be developed to allow data to be integrated in one place.