

Response ID ANON-JJ98-ZGHH-P

Submitted to **Consultation on Consistency in Household and Business Recycling Collections in England**
Submitted on **2019-05-13 18:35:19**

Introduction

1 Would you like your response to be confidential?

No

2 What is your name?

Name:
Simon Ellin

3 What is your email address?

Email:
simon.ellin@therecyclingassociation.com

4 What is your organisation?

Please provide further comments :
business representative/trade association

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

The Recycling Association

Proposal 1:

5 Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

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

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

Agree

Please provide further comments :

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:

N/A

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 :

N/A

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 :

N/A

Proposal 2

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

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

tick - food and drinks cartons:

Should be included in the core set

tick - plastic bags and film:

Should be included in the core set

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 :

Full net cost recovery in EPR should mean that the producer pays to have their packaging recycled - this is the whole ethos of the RWS per se and the ambition should be to deliver this on day 1 and is why we believe the core materials should include plastic film and cartons. Modulation (or Model 4) should mean the eradication of non-recyclable materials and this, coupled with consistency and properly funded local authorities will drive appropriate collection infrastructures.

The plastics tax coupled with EPR and consistency should lead to investment in new markets to handle the plastic film.

If plastic film and/or tetra pack/cartons is included as a core material, it is essential that it is collected separately from other paper and card as it is a contaminant.

An unintended consequence is that it could cause quality issues with other core materials, so it is very important that either these materials are collected separately or they have the MRF/processing technology in place to deal with them.

If tetra pack is added to any DRS scheme (which we believe is the best option) then we would be happy for cartons to be a non-core material.

13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Please provide further comments :

If either plastic film or cartons are included at a later date, they would either need to be collected separately or MRFs configured to handle and separate them from other materials.

At the moment, cartons/tetra pack end up in mixed papers where they are generally regarded as a contaminant - not only because of the difficulty in extracting the pulp and waste generated through the plastic and aluminium content, but also their propensity to hold food/drink residues and thus the potential food contact issues that arise. They are also regarded as mixed materials (paper, aluminium and plastics) and therefore are not green listed for export purposes.

Likewise, plastic films are very difficult to totally separate in MRFs and they are a major contaminant across all materials. Technical solutions would be required to reconfigure processing facilities to handle them

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 :

If at the time of adding a core material, the only sustainable route for final processing is export, there needs to be a full risk assessment of the exposure to exporters from the UK's implementation of the regulatory framework.

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

Please provide further comments :

No

Proposal 4

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

tick - a least a weekly collection of food waste:

Agree

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

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

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

Agree

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

Agree

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

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

Please provide further comments :

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

Please provide further comments :

No

Proposal 5

21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

I am not responding on behalf of a local authority

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

Please provide further comments :

No

Proposal 6

23 What are your views on this proposal?

Please provide further comments :

To the best of our knowledge, we would agree with this

Proposal 7

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

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

Agree

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

Agree

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

Agree

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

Agree

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

Agree

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

Please provide further comments :

No

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 :

Demographics are a major factor preventing the separate collection of paper, card, glass, metals and plastics eg flats, very urban areas or very rural areas (Suez definitions)

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

Please provide further comments :

The major factor affecting the quality of output from MRFs and other processing facilities, including those accepting multi stream collections, is the quality of infeed. And, also taking demographics into account, we would like to see transition to separate collections where appropriate, following an assessment of the impact of EPR and consistency on output qualities. Following this, we are in favour of transitions to separate collections for materials where it makes a tangible difference to the quality of outputs and their subsequent compliant and sustainable final processing.

We believe separating paper from other materials is a transition that should happen as contracts are renewed regardless of EPR and consistency.

Proposal 9

29 Do you agree or disagree with this proposal?

Agree - bin colours should be standardised for all waste streams

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

Not Answered

Please provide further comments :

Please see 31 below

31 Do you have any other comments about Proposal 9?

Please provide further comments :

The numbering system proposed by Suez could be a more flexible and cost effective solution. It would also be a more environmentally friendly solution than replacing perfectly serviceable collection receptacles to achieve standardised colours. This numbering system would also overcome any regional collection differences due to demographics and other factors. It would also be a far simpler, cheaper and flexible way of introducing new materials.

Whichever system is introduced, it must be absolutely coordinated with a new labelling system.

Proposal 10

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

Agree - government should publish statutory guidance

33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

Not sure/no opinion/not applicable

34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week. Do you agree or disagree with this proposal?

Agree

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

Please provide further comments :

In relation to 33, we agree it should be reviewed regularly but "few" is not an entity and needs defining.

In relation to 34, we agree with a minimum collection of residual waste if there is the introduction of weekly food collections.

Proposal 11

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

Please provide further comments :

We had a sub-committee meeting to discuss this consultation and did a poll of the 9 people at the meeting asking the question - "have you ever heard of Recycle Now and National Recycling Week outside of your working environment?" Nobody had and it is an indication that the body needs to improve effectiveness. However, we do feel that it is the appropriate body and hope that improved funding through EPR etc will improve its effectiveness.

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

Please provide further comments :

Clear and unambiguous labelling.
Consistent instructions on how to recycle (eg wash ,squash and put the lid back on).
National campaigns supporting local campaigns which creates a UK culture of recycling.
Recycled content information could help.

Proposal 12

38 Do you agree or disagree with this proposal?

Disagree – government should not 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 :

The RWS per se is aimed at creating improved qualities of recyclates which will provide improved and more compliant markets at home and abroad. Although we may create some new processing infrastructure in the UK, particularly for plastics, we are likely to continue to have a reliance on overseas markets. As long as these shipments and markets are compliant, we do not see any gain in informing householders of end destinations for their materials. It will not give them greater confidence, it will give them less confidence as we believe that this can only create negative connotations as the householder will not understand the importance and usually compliant nature of exporting , particularly when all the media stories are negative.

Proposal 13

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

Please provide further comments :

Firstly, the statement that a reliance by the UK recycling sector on overseas export markets for the recycling of various materials, especially paper and plastics has in recent years exposed councils and their contractors to price fluctuations and service costs is misleading and a common industry myth. The export market has a) provided them with a market for their materials when otherwise they would have had to burn it or landfill it and b) it has provided them with high and sustainable prices for their materials. Incineration and landfill is a cost, not a revenue and if the UK had a monopoly on markets, prices would be much lower and there is no guarantee that stability of prices would ensue.
Furthermore the statement that local authority costs have increased by £500,000 on average over the last year and since the China ban is again misleading. It is a small snapshot in time and does not reference all the high prices they have benefited from over previous years. It also does not cite the record cardboard prices businesses and some local authorities benefited from in 2018 from supplying China.
It is also misleading to cite DRS achieving greater qualities of materials and thus price. The materials DRS will pull out of the system is not the problem area - these materials enter markets that are very well developed with high demand and robust historical prices. It is the lower quality, non-DRS materials that present the problems.
However, we do acknowledge that the UK is over exposed to overseas markets and we need to stimulate investment in UK processing infrastructure - many of the measures in the RWS can only improve the chances of this. We also agree that improved qualities, given certain market conditions, can mean increased prices. Good qualities certainly give greater access to markets.
As mentioned previously, we believe investment in plastics processing facilities in the UK is likely following the implementation of the measures in the RWS. However, significant investment in paper and card processing infrastructure is unlikely to occur in the UK. For this reason, although we fully support the measures to increase UK investment, we believe the strategy is too UK centric and we need to take measures to protect the compliant overseas markets that are so fundamental to the delivery of this strategy.

Proposal 14

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

Agree

Please provide further comments :

We must have KPIs to measure success

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

Agree

Please provide further comments :

Any measures introduced must also include metrics for quality of outputs.

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 :

How will this be weighted to take into account demographics? Councils in semi-rural areas always come out on top of league tables - this can throw out false data which is used to measure success when more difficult areas may be performing much better pro rata.

We think non-binding indicators will facilitate transparency and more accurate data.

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 :

A metric measuring quality is an absolute must.

A metric measuring the full carbon impact of all measures contained in the RWS is required. For example in DRS, what is the impact of car travel to the redemption points and the carbon footprint of transporting low weights of materials from the redemption points to the processing facility?.

A demographic metric weighted on characteristics of population would be useful.

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 :

N/A

49 How might Government help overcome these barriers?

Please provide further comments :

N/A

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

Please provide further comments :

N/A

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 :

Any system for household like mixed dry recycling must exactly match collections from the household. Consistency will underpin the success of the RWS and is what this particular consultation is all about!

53 We would expect businesses to be able to segregate waste for recycling in all circumstances but we are interested in views on where this may not be practicable for technical, environmental or economic reasons

Yes – it should be practicable to segregate waste for recycling in all circumstances

Please provide further comments :

The RWS per se is designed to achieve this.

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 other comment

Proposal 18

56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

Agree

Please provide further comments :

57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

Agree

Please provide further comments :

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 :

No

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 :

No

Proposal 19

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

Please provide further comments :

N/A

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

Please provide further comments :

N/A

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 :

N/A

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 :

We must have data with which to measure the impacts of the RWS across the board. We must be very careful not to concentrate all of our efforts and resources on the household waste stream and neglect the at least equally important business waste sector.

66 Do you have any other comment on Proposal 20?

Please provide further comments :

No