



Department  
for Environment  
Food & Rural Affairs

**Consultation on consistency in household  
and business recycling collections in  
England:  
Part 2: analysis of organisational responses**

**July 2019**



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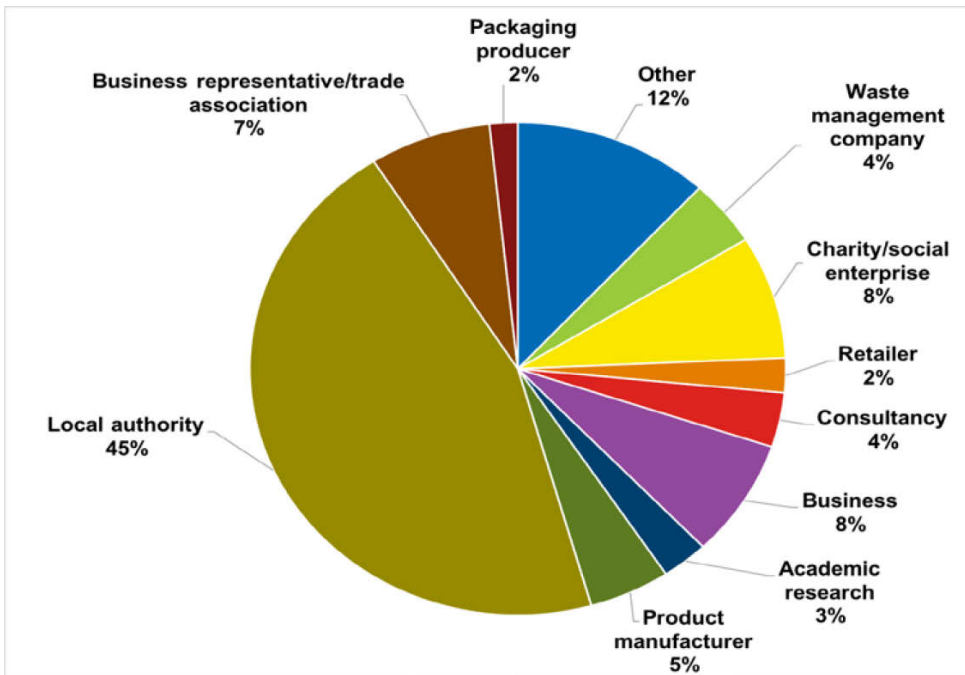


# Overview

The consultation on Consistency in Household and Business Recycling Collections in England closed on 13 May 2019. Over 1700 responses from individuals businesses and other organisations were received. This document will make up the second part of the analysis, focusing on those respondents who classified themselves as a stakeholder or part of an organisation. A total of 531 responses fell into this category. The stakeholders were then broken down into organisation type and their responses analysed against each question. A summary of responses from householders and members of the public is on a separate document: <https://www.gov.uk/government/consultations/waste-and-recycling-making-recycling-collections-consistent-in-england>

Organisation types have been listed below:

- Local Authorities;
- Business;
- Business representatives/Trade Bodies;
- Retailers;
- Waste Management Companies;
- Packaging Producers;
- Produce Manufactures;
- Charities and Social Enterprisers;
- Consultancies;
- Academic researchers; and
- Uncategorised or Other.



**Figure 1: Q4 Type of Organisation**

The majority of responses received were submitted via the consultation hub<sup>1</sup> but a number were received via email. Local Authorities provided the greatest number of responses (241 responses and 45%) by some margin.

Question 1-4 of the consultation involved respondents providing personal details such as names, e-mail address and the organisation they represent. Therefore this information will not be included in this document and analysis of responses will begin at question 5.

Given the high level of public and stakeholder interest in recycling we are publishing the summary of responses earlier than required to signal a clear direction of travel. This necessarily means that specific details of policy design will be developed in the months informed by further work to analyse the responses received in more detail. We will also gather more evidence. We will continue to work with all stakeholders to develop there more detailed propositions

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<sup>1</sup> <https://consult.defra.gov.uk/environmental-quality/consultation-on-consistency-in-household-and-busin/>

# Dry recycling

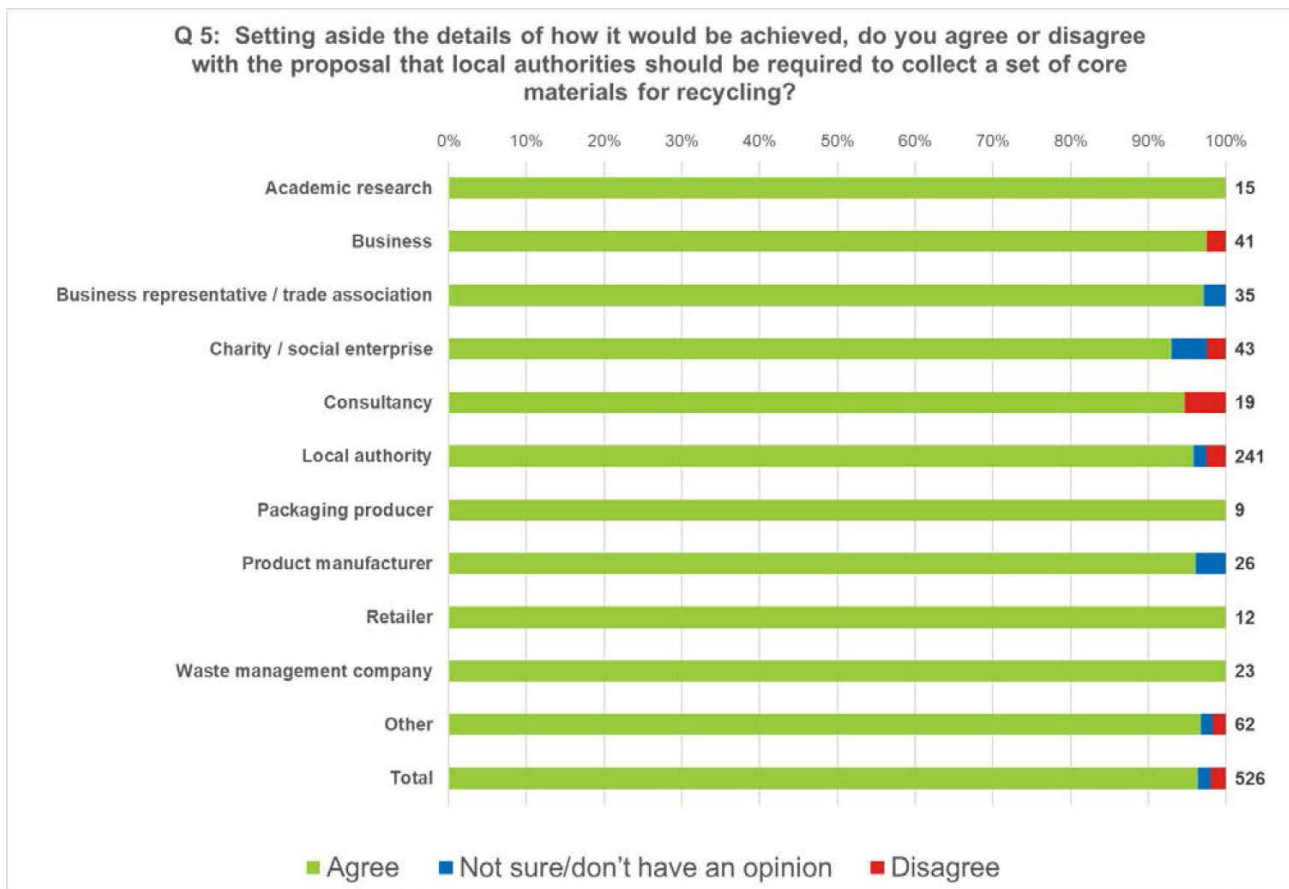
## Proposal 1: core set of dry recyclable materials

We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

### Question 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: **507 responses (95%)**
- Disagree – local authorities should not be required to collect a core set of materials: **10 responses (2%)**
- Not sure/don't have an opinion: **9 responses (2%)**
- Not Answered: **5 responses (1%)**

Figure 2 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). For each organisation type the percentage of responses that Agree is above 93% and the total across all organisation types is 96%.

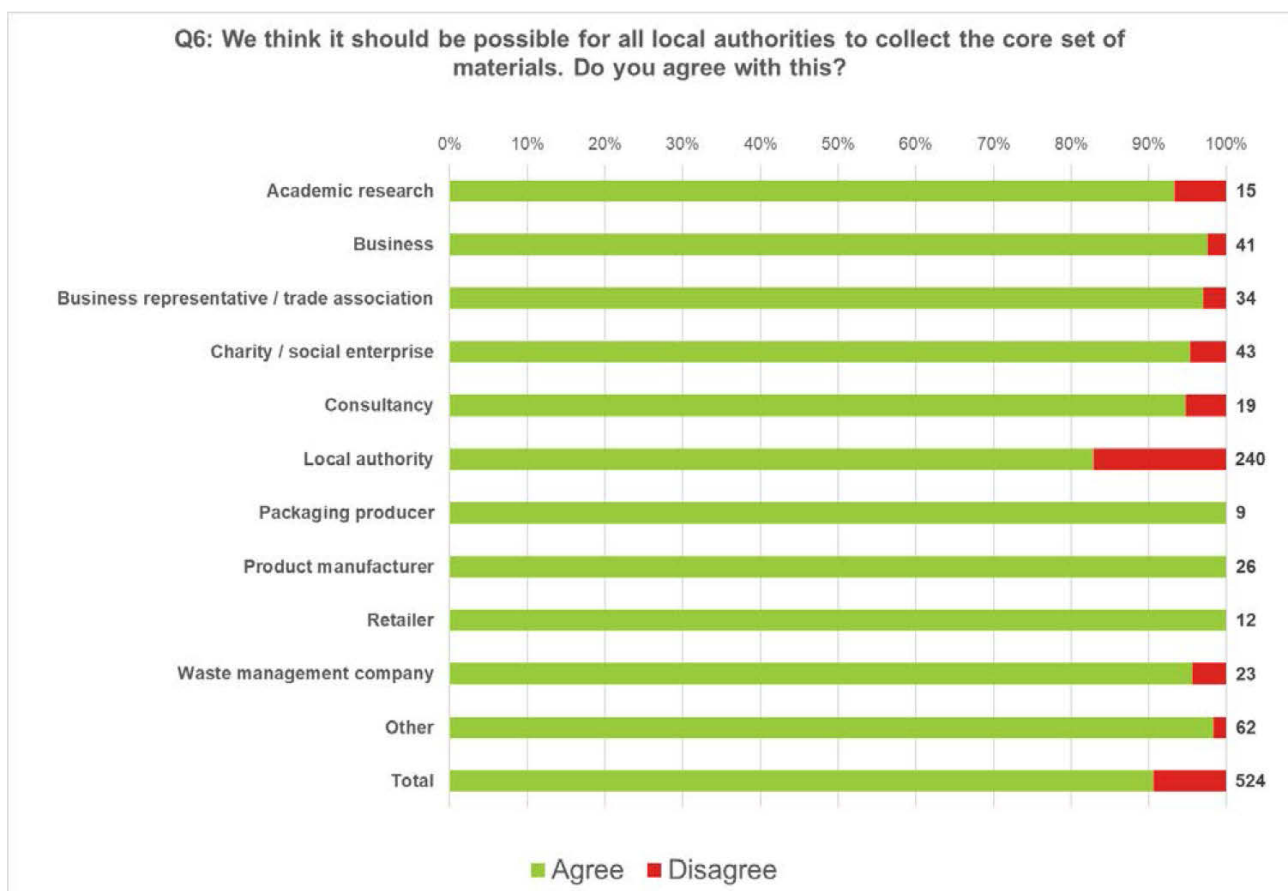


**Figure 2: Q5 analysis for answered responses**

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

- Agree: **475 responses (89%)**
- Disagree: **49 responses (9%)**
- Not Answered: **7 responses (1%)**

Figure 3 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). For all organisation types the percentage of responses that Agree is above 90% except for Local Authorities, which is 83%. The total across all organisation types is 91%.



**Figure 3 Q6 analysis for answered responses**

For those that disagreed, the following additional information was provided:

- 103 comments across 19 key themes/issues
- concerns around material processing and outlets/markets for materials was identified as an issue the greatest number of times (32)
- requirement for additional funding (20)

- DRS impacting on the remaining quality of materials collected by local authorities (20)
- greater flexibility to take in to account local circumstances (10) and linked to this concerns around collections at flats/communal properties and rural/urban areas where standard collections may not be appropriate (5)
- consideration of alternative collection methods i.e. underground storage, vacuum systems and bring sites
- other points raised:
  - greater education
  - cost benefit analysis should be used to determine materials
  - materials should be managed in the UK and not exported
  - small scale energy recovery at households should be considered
  - poor quality materials arising from flats
  - planning policy to improve specifications for collection systems i.e. space for recycling containers, etc.
  - core set of materials should be wider
  - ability to set up agreements outside of current legislation
  - invest in MRF (Materials Recovery Facility) / reprocessing technology
  - MRF (contract / technology) dictates what can be collected

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

432 respondents provided 1162 comments which were categorised into 16 specific considerations or challenges. Local Authorities provided by far the most comments (863).

The overwhelming issue raised (308 comments) was the need for adequate capacity and storage arrangements to be made available for residents in existing flats and houses in multiple occupancy to participate in any collection of materials. In addition, a further challenge was perceived as the lack of ownership/responsibility for bins/waste by residents (139 comments).

To overcome these challenges, the main comment was that the collection service should be supported by a range of communication and engagement activities. This received the second highest number of comments with 194 mentioning it in their responses. On a similar theme a further 99 comments identified education as an important element. Key stakeholder such as landlords and agents were recognised in 101 comments.

In addition to awareness raising to encourage participation, monitoring/enforcement measures to combat issues such as contamination, fly-tipping etc. was raised in 67 comments

It was acknowledged that the delivery of the service should be accessible and convenient (100 comments), however operational issues such as access issues for vehicles/crews (32 comments) and the impact of additional workload for collection crews (13 Comments)

should be considered. In 14 comments it was raised that alternate or bespoke collection system would be required to be developed as a different system to standard household's collections

A concern raised in 77 comments was that local authority budget constraints would inhibit delivery of the service.

Other concerns identified were a negative aesthetic / impact on the Streetscene (6 comments) and the potential for odour (3) from materials.

**Question 8: What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.**

687 comments (with some responders providing more than one comment) were categorised into 27 substantive suggestions. The vast majority of these (514) were from local authorities.

The most common comment (136) concerned the need to improve or enhance the current building regulations (as cited on page 21 of the consultation document), with regard to the requirement to provide adequate bin storage and vehicle access. The comments identified a perceived requirement to assess and update the National Planning Policy Framework and adopt the guidance as the new minimum standard going forward; this was seen as critical to enable the successful introduction of recycling schemes to flats.

A further 83 comments felt that further statutory requirements should be placed on managing agents / landlords, obligating them to provide and maintain appropriate facilities to ensure a full range of materials can be presented for segregated collection. 4 comments suggested the provision of containers should be the responsibility of managing agents / landlords.

57 comments highlighted the requirement for adequate capacity and storage for bins at flats, with appropriate vehicle access an important consideration; a further 35 comments raised practical concerns regarding the issue of space constraints for the provision of collection facilities in older flats and flats above shops.

25 comments suggested that the limitation of storage space for containers at flats may require an increased collection frequency should the range of recyclable materials be increased, and noted the additional cost implications this would represent.

30 comments suggested that the limitations of space at flats may compromise the ability to provide sufficient containers to facilitate full segregation of materials; it was noted that if this led to the introduction of co-mingled schemes, a TEEP exemption could be required. Only 2 comments specifically suggested a requirement for flats schemes to be consistent with kerbside schemes. 2 comments suggested utilising a coloured bag scheme for co-mingled recycle to reduce number of bins required. 3 comments suggested that the

provision of localised DRS facilities would assist in reducing the volume of recyclables requiring management by collection schemes.

13 comments suggested that, due to the varied nature of flats, a building by building service assessment would be required to identify the facilities which would be operationally practical, noting the additional resources required. 5 comments suggested that assisted collections may be required for residents unable to transfer their recyclate from their flat to the containers; 14 comments suggested the provision of in-flat containers and space for separate storage of recyclate within flats, while 7 responses suggested the introduction of dedicated recycling chutes into appropriate properties.

The issue of contamination was raised in 86 comments; these focussed on the requirement for additional resources both to enforce participation and address contamination. It was noted that the Deregulation Act has limited local authorities' ability to enforce appropriate waste segregation. 15 comments suggested that a combination of financial incentives and fines to recognise participation and quality could be introduced; 7 comments suggested locked containers combined with the provision of resident pass keys for containers; a further 7 suggested that incentivising resident groups would promote both participation and quality, whilst promoting a community approach.

115 comments emphasised the requirement for extensive communications and engagement with residents in flats, with specific targeted intervention utilised where appropriate. It was noted that this would require additional resources. A further 12 comments suggested that educational communications to all households would need to incorporate those residents in flats.

21 comments noted that current budget constraints would make the introduction of additional recycling facilities to flats difficult to achieve without additional funding being made available.

**Question 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.**

322 respondents (61%) provided a substantive response to Q9. Among them, over two-thirds (222 respondents) agreed with the proposal and about a quarter (85) expressed no clear preference in their answer, with only 15 (5%) disagreeing.

For the respondents that provided a substantive response, the main reasons offered for agreeing with the proposal were that it would reduce confusion (40 respondents, 12%) and that it would help as people move about the country (36 respondents, 11%).

56 respondents (17%, all but one being local authorities) thought that councils should be allowed 'local exceptions', some saying that the justification might be based on analysis similar to TEEP. 13 respondents thought councils should be able to collect additional materials beyond the core list, whereas 4 argued that this would perpetuate the

inconsistency issues the proposal is trying to address. 10 respondents said that councils should be able to choose what is collected, based on local circumstances. 34 respondents (11%, 31 from local authorities) mentioned “difficult to reach” households, several noting that, as well as flats/HMOs, issues might arise in inner-city terraced houses and very rural locations.

Funding was widely raised as a potential issue with the proposal. 68 respondents from local authorities, and 79 (25%) overall, observed that the new collection regime would require additional funding, with many noting that authorities should receive “full net cost recovery”. 25 authorities commented that these costs would not arise uniformly across authorities, and therefore asked that any such allocation reflect these discrepancies.

Another commonly raised concern was the maturity of end markets to receive the diverted materials. 62 respondents (19% and including 58 local authorities) flagged that end markets could be an issue, and 57 respondents (18%) observed that there needs to be adequate UK reprocessing capacity. On a related theme, 58 respondents (18%) had some sort of query about the proposed set of core materials, the most common challenge (42 respondents, 13%) being whether or not to include plastic pots, tubs and trays (PTT), because of the limited market for their materials.

67 respondents (21%, including 60 local authorities, often using very similar text) noted that the proposal would not address issues with existing contamination of recycling streams, with 59 mentioning wastes such as nappies and polystyrene that are not among the core materials. 14 said that enforcement powers should be reviewed, with several indicating a need to address this particular issue.

46 respondents (14%, from many different organisation types) commented about the importance of communications, instructions and/or labelling to help the public understand what would be required. 36 respondents (11%) raised the issue of better packaging and product design, to either ban or ‘design out’ non-suitable materials.

Finally, several respondents observed the significant overlap with extended producer responsibility (52, 16%) and the proposed deposit return scheme (20, 6%).

## **Proposal 2: materials in the core set of dry recyclables**

We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

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

- Glass bottles and containers
- paper and cardboard
- plastic bottles



- plastic pots, tubs and trays
- steel and aluminium tins and cans

### Glass bottles and containers

- Should be included in the core set: **505 responses (95%)**
- Should be excluded from the core set: **9 responses (2%)**
- Not sure, don't have an opinion, not applicable: **11 responses (2%)**
- Not Answered: **6 responses (1%)**

Figure 4 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). There is some variation by organisation type but for each organisation type the percentage of responses that Agree is above 89% and the total across all organisation types is 96%.

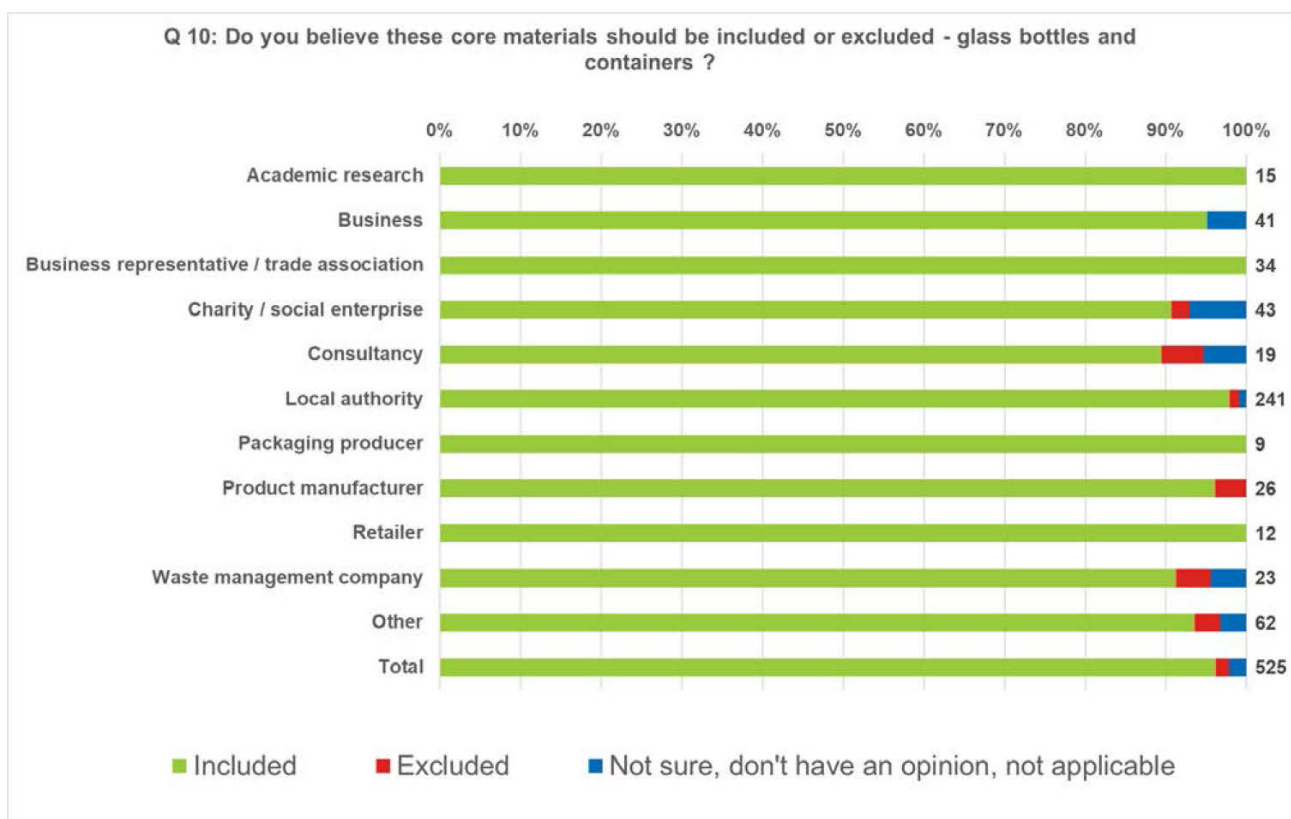
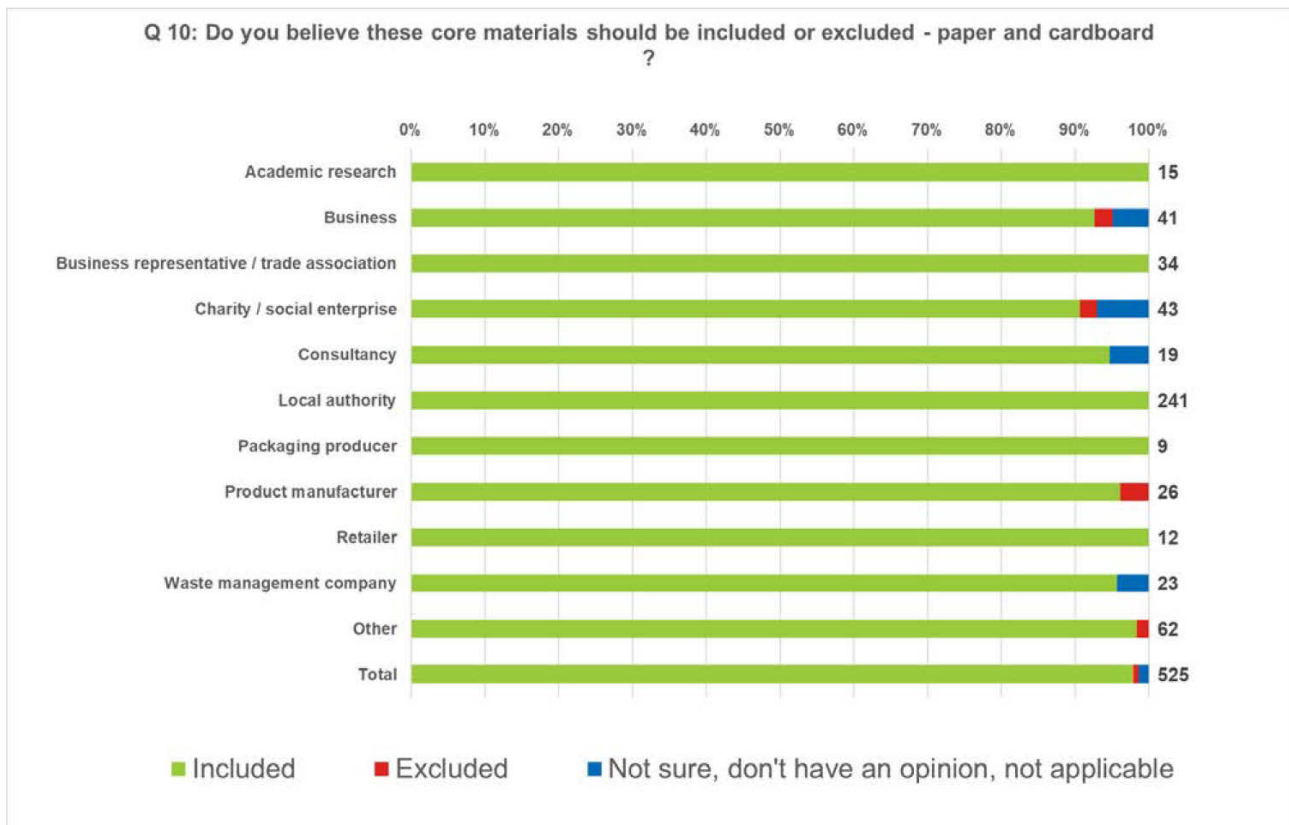


Figure 4: Q10 analysis for answered responses - glass bottles and containers

### Paper and cardboard

- Should be included in the core set: **514 responses (97%)**
- Should be excluded from the core set: **4 responses (1%)**
- Not sure, don't have an opinion, not applicable: **7 responses (1%)**
- Not Answered: **6 responses (1%)**

Figure 5 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). There is some variation by organisation type but for each organisation type the percentage of responses that Agree is above 91% and the total across all organisation types is 98%.

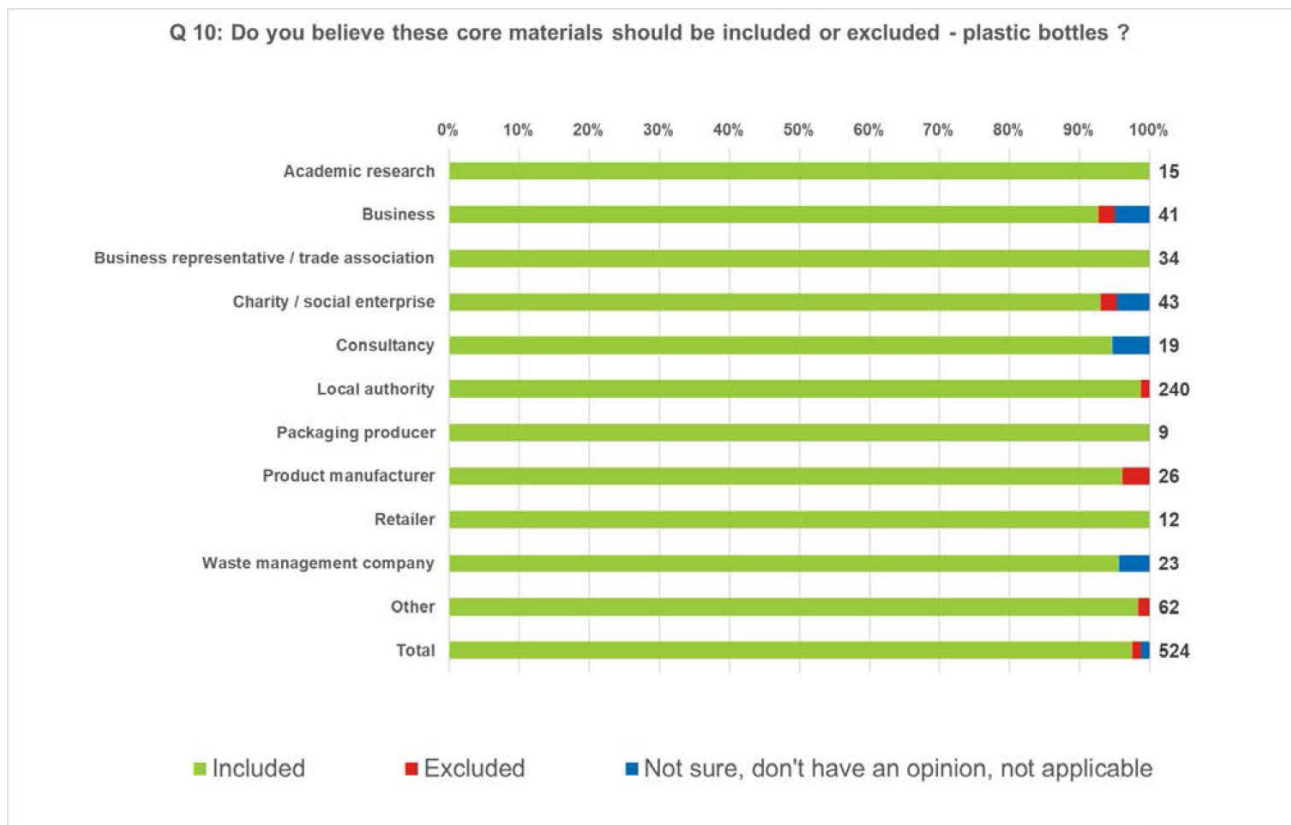


**Figure 5: Q10 analysis for answered responses - paper and card**

### Plastic bottles

- Should be included in the core set: **511 responses (97%)**
- Should be excluded from the core set: **7 responses (1%)**
- Not sure, don't have an opinion, not applicable: **6 responses (1%)**
- Not Answered: **7 responses (1%)**

Figure 6 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). There is some variation by organisation type but for each organisation type the percentage of responses that Agree is above 93% and the total across all organisation types is 98%.

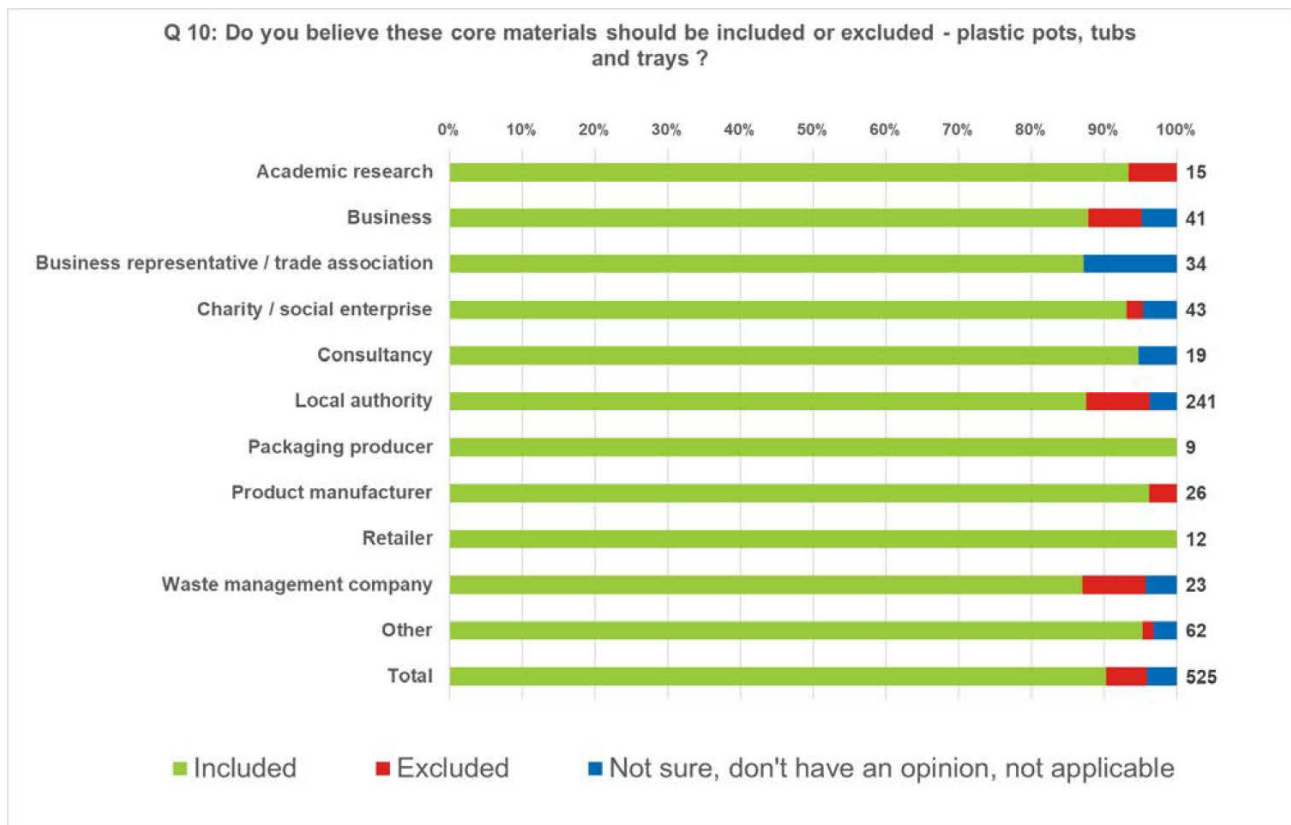


**Figure 6: Q10 analysis for answered responses - plastic bottles**

### Plastic pots, tubs and trays

- Should be included in the core set: **479 responses (90%)**
- Should be excluded from the core set: **30 responses (6%)**
- Not sure, don't have an opinion, not applicable: **16 responses (3%)**
- Not Answered: **6 responses (1%)**

Figure 7 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is some variation by organisation type but for each organisation type the percentage of responses that agree is above 87% and the total across all organisation types is 91%.

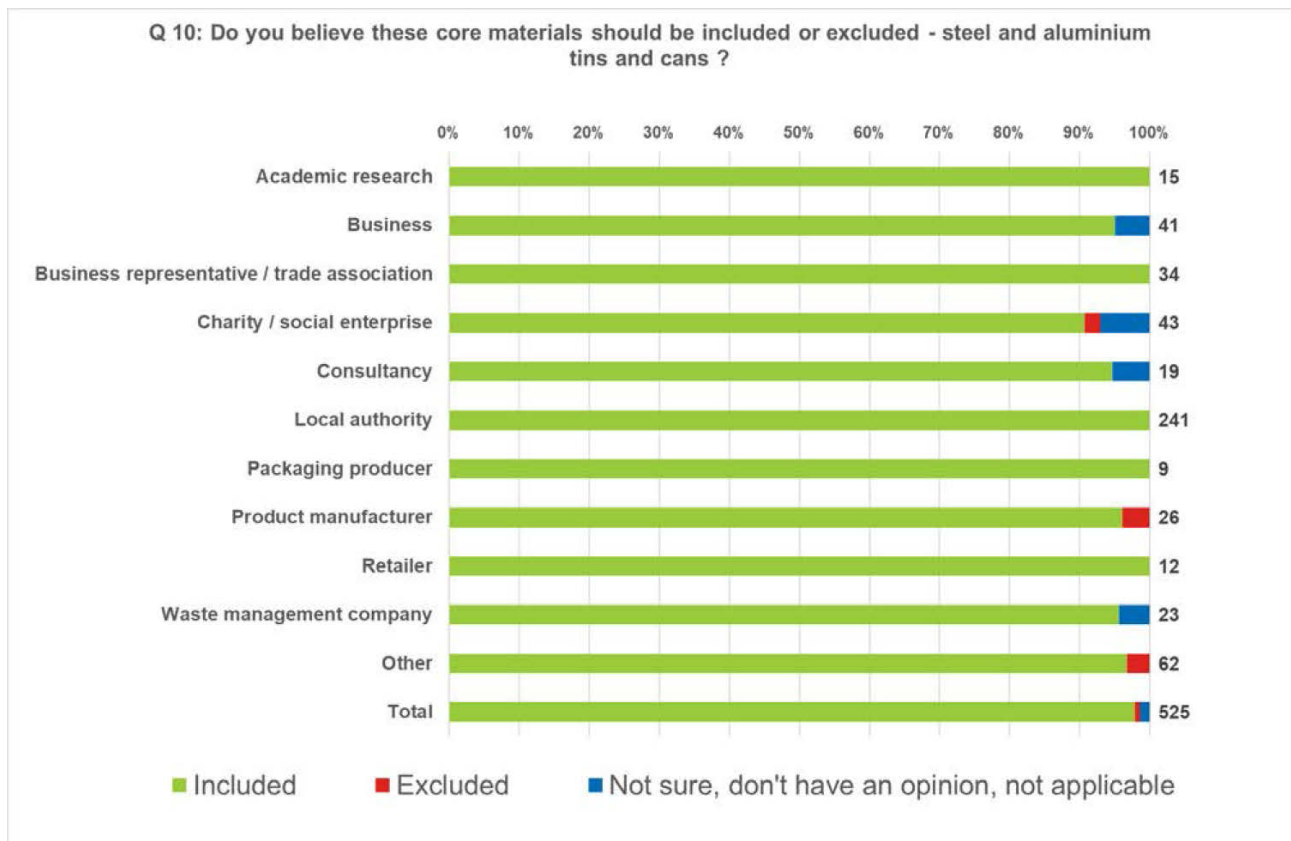


**Figure 7: Q10 analysis for answered responses - plastic pots tubs and trays**

### **Steel and aluminium tins and cans**

- Should be included in the core set: **514 responses (97%)**
- Should be excluded from the core set: **4 responses (1%)**
- Not sure, don't have an opinion, not applicable: **7 responses (1%)**
- Not Answered: **6 responses (1%)**

Figure 8 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). There is some variation by organisation type but for each organisation type the percentage of responses that Agree is above 95% and the total across all organisation types is 98%.



**Figure 8: Q10 analysis for answered responses- metals**

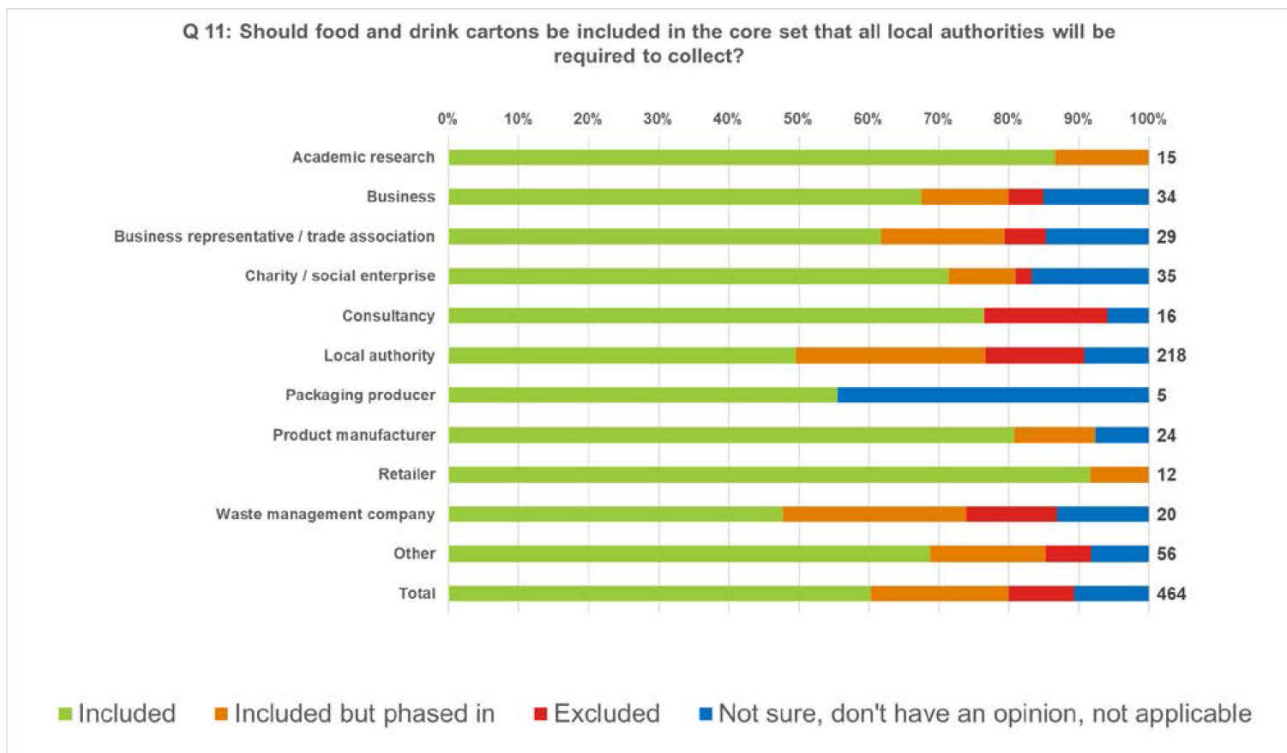
**Question 11: What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?**

- food and drinks cartons
- plastic bags and film

**Food and drinks cartons**

- should be included in the core set: **313 responses (60%)**
- should be excluded from the core set: **102 responses (20%)**
- not sure, don't have an opinion, not applicable: **49 responses (9%)**
- not answered: **55 responses (11%)**

Figure 9 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is variation by organisation type but for each Agree is the predominant answer. The total across all organisation types is 60%. Responses from organisations that identify as waste management companies or local authorities were notably lower at 48% and 50% respectively.

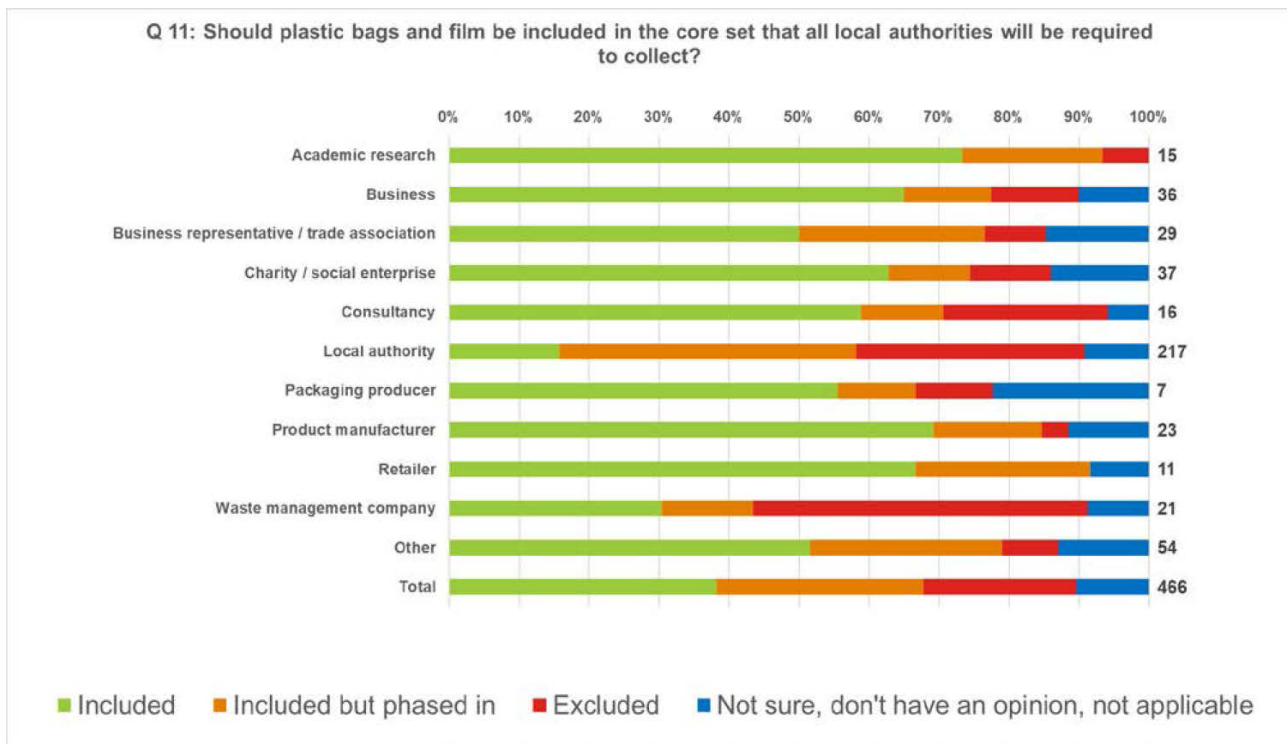


**Figure 9: Q11 analysis for answered responses- cartons**

### Plastic bags and film

- should be included in the core set: **199 responses (37%)**
- should be included in the core set but phased in: **153 responses (29%)**
- should be excluded from the core set: **114 responses (21%)**
- not sure, don't have an opinion, not applicable: **54 responses (10%)**
- not answered: **11 responses (2%)**

Figure 10 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is considerable variation by organisation type and the percentage of responses that indicated plastic and film should be included in the core set varied between 16% and 73%, with the total being 38%. Organisations that identify as waste management companies or local authorities were notably lower at 16% and 30% respectively. 42% of Local Authorities answered that it should be included in the core set but phased in.



**Figure 10: Q11 analysis for answered responses- plastic bags and film**

**Question 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.**

Out of the 531 survey respondents, 447 comments were categorised into over 100 substantive suggestions. The vast majority of these (234) were from local authorities.

In summary, there is a balance to strike between collecting all materials types and the need for cost effective reprocessing options. Some people wanted to expand the list of materials sooner rather than later, but the others highlighted the practical challenges of doing so, and some respondents provided insights from both sides.

In general, there were two main opposing opinions in the responses – whether to exclude any other materials into the core set until enough reprocessing infrastructure and local markets become available, or to include some specific materials in the hope that this would stimulate industry to build infrastructure and local markets could be nurtured. Most respondents 76 who commented on this topic felt strongly that no other materials should be added, whilst an additional 58 respondents specifically commented on their reasons for exclusion of plastics bags / film and 52 respondents on excluding food & drinks cartons. An additional 14 respondents commented that only when enough reprocessing infrastructure was in place to support the increased volume of materials, should the materials become part of the core set, and an additional 10 suggesting phasing in new materials to accommodate new technology processing evolving and markets maturing.

Further comments supporting the exclusion of any new materials into the core set were on the following grounds: 28 needed more assurances on material recyclability and environmental benefits, 20 thought that it was more important to focus on increasing capture of the initial core set, 20 noted that the public need to have confidence that their recycling efforts are 'worth it' and need transparency in the material end destinations. Conversely 4 respondents saw inclusion of additional materials in the core set as an opportunity for industry to have enough certainty to upgrade or invest in new sorting infrastructure.

Producer responsibility to design packaging which is easily recyclable / compostable was noted in various ways. 24 respondents highlighted this generally, but an additional 19 wanted this to be a focus of government, and at least another 10 comments were pointing at 'designing out' plastic films and cartons from being used in products.

Comments specifically on plastics bags and film focussed around the following: 33 respondents noted the need for the UK Plastics Pact to work hard to enable solutions to be implemented nationally, after there was confidence in the system; 20 attributed their decision to exclude them because of 'material quality and sorting issues' and a further 21 specifically noted the problems caused by processing them at MRFs; 15 foresaw increased contamination levels of the entire recycle stream and a further 16 anticipated this due to the difficulties in identification of the different plastic types (as not all plastic films types would be included); 6 highlighted the positive impact the charge on plastic bags has had and that including them in recycling would reduce their reuse, with a further 5 stating 'reuse not recycle'; and 5 respondents noted a need for further research into best practical environmental options before a decision is made to include plastic film in core set. Conversely, 7 respondents wanted further research and development undertaken on plastic film so that it could be included sooner, and 6 respondents saw that including plastic bags would mean an increase in overall recycling as the recyclables currently presented in plastic bags could also be recovered.

Other comments around plastics included: 7 noted that black plastic (including food trays) needed further processing technology to be developed at MRFs or further solutions were needed at the design stage (in addition to the green dye solution); 7 commented on the general lack of local processing infrastructure available, and 8 respondents specifically noted that compostable plastics needed to be excluded.

There was a mixed opinion about the ability of the current MRF processing infrastructure to be able to sort food and drink cartons with 7 respondents suggesting that there would be significant challenges, and 6 agreeing to their immediate inclusion as suitable processing infrastructure was believed to be available. Other comments specifically on food and drinks cartons included 3 respondents noting these cartons would likely be contaminated by food residues and that clarity was required about whether 'tetrapaks' are included in 'drink carton' category (6).

The top materials mentioned for additional inclusion in the core list were: plastic pots, tubs, trays (22) as a number of councils were already doing this (noting that there would be



MRF upgrades required and an impact of lowering the calorific value of current residual waste going to EFW (4), textiles (18) (although there were 4 against their inclusion, 4 only supportive if phased in, and 1 only supportive if bagged separately), aerosols (17), tin foil (13) (although an additional 2 were supportive if phased in over time), small WEEE (12) and batteries(10) (although these last two materials were noted as having the potential to cause fires and therefore would need to be collected separately). Other materials mentioned by less than 10 respondents included food (9), Absorbant Hygiene Products (AHP) (4), and plastic flower pots (4).

Finally, there were cautions from respondents on the following areas: if new materials are added to the core set immediately and no markets become available, then government should compensate LAs for losses (10); need to consider which materials would go into the Container Deposit Recycling Scheme and which would be kept in the core set (6); and need to consider the impact of EPR and proposed plastics tax.

### **Question 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?**

535 comments were categorised into 32 substantive suggestions. The vast majority of these (241) were from local authorities.

Three particular overarching issues were raised: 91 respondents felt it was important to ensure that stable markets were ensured and/or developed prior to the inclusion of any of the core materials or additional ones, such as soft plastics, textiles etc. and 89 respondents felt it was important to ensure that appropriate processing and transport infrastructure would be in place before the core materials or any additional materials are included. Many noted that current infrastructure cannot process the entire list of core materials and that there would need to be upgrades or changes to processing infrastructure for all of the core materials or additional ones to be included.

In total, 59 respondents highlighted the importance of clear education and communications about any changes to materials collected to the community, either through overarching and standardised campaign (40 respondents) or through a specific campaign to reduce contamination and improve presentation of materials (19 respondents), particularly for food containers.

37 respondents highlighted 'soft plastics', i.e. plastic bags, cling film and other packaging as a potential material to include at a later date, but only after a review of current MRF infrastructure to ensure it that could be processed and would not damage the machinery. 14 of those that highlighted soft plastics thought these should be included and considered only if kerbside sorting was possible. A number of these respondents also highlighted the need for strong stable markets for soft plastics output before inclusion as discussed above.

31 respondents commented that further liaison with manufacturers needed to occur before including the core materials, to ensure that materials/grades materials like plastics were

consistent and recyclable. 16 respondents felt that any list of core materials needed to be designed to be generally flexible to allow for the addition of appropriate materials later on as markets and infrastructure change. 9 respondents also commented on the need to continue and extend support for 'tricky' items which currently end up as contamination, potentially through Extended Producer Responsibility schemes.

The need for appropriate funding for any changes in collection infrastructure required by the addition of new materials was suggested by 18 respondents, with a further 21 noting that local authorities would need support to renegotiate commercial contracts or other legal barriers to implementation of a core list of materials. A further 4 respondents noted that local authorities should be given appropriate lead-in time to allow for any changes.

A number of additional materials were suggested for inclusion at a later date: Tin foil and trays (3 respondents); nappies (4 respondents); cartons (3 respondents); textiles (5 respondents); batteries (8 respondents) and small Waste Electrical and Electronic Equipment (WEEE) (8 respondents); and compostable packaging (3 respondents).

## **Question 14: Do you have any other comments to make about Proposal 2?**

291 comments were categorised into 23 substantive suggestions. The vast majority of these (168, 58%) were from local authorities.

Of the most frequently cited comments, 72 respondents (25%) of which 61 were local authorities, commented that there is a need for investment in the UK processing infrastructure capable of dealing with the type and volume of materials proposed. The second most frequent comment was that it is important to also consider the EPR and DRS consultations/proposals (60 respondents, 21%).

Clarification of the list of core materials and recommendations to consider other materials (e.g. all plastics, aerosols, cartons, foil, caps, oils, films) were made by 48 respondents (16%). Concern about the supply and demand (and quality) of materials to market was raised by 42 respondents (14%).

37 respondents (13%) commented that there is a need for better education and awareness for householders on how to present materials for recycling, which could be further reinforced by mandatory, consistent and clearer (e.g. binary) labelling on packaging (30 respondents, 10%).

Equal numbers of respondents commented on two different viewpoints of the time that should be given to Local Authorities to adapt to the changes. 18 respondents felt that more time should be allowed for them to adapt (particularly in relation to contracts currently in place); while the same number felt that allowing local authorities to run out current contracts would cause significant delays in the implementation of any changes.

16 respondents raised the issue that the waste hierarchy and the circular economy should be prioritised over recycling, and the same number felt that producers must consider the recycling process (e.g. phase out black plastic) and minimise packaging. In terms of collections, 15 respondents commented that only material that can currently be recycled should be collected.

16 respondents said that any proposals to introduce new materials to the core list should be based on the cost–benefit and an impact assessment. 14 respondents made the comment that funding should be provided to local authorities in the event that new materials are added to the list which are required to be processed. The same number of respondents said that LAs already collecting all core materials should not be (financially) penalised or discouraged from collecting additional materials.

Questions on the contribution that household waste recycling centres and bring banks can make to the collection of the core materials were raised by 12 respondents. Related to this point, 7 respondents raised (mainly safety) concerns about the collection of glass at the kerbside.

Other comments made by only a few respondents included: the need for a clear timeline/ clarity on frequency of reviews (8); there should be no single-use product/ plastic material that can't be recycled (7); concern about managing materials if no processing facility is available (5); items collected will be determined by the market price/demand (4); non core materials may not be recycled - concerns over how these are managed and unintended consequences of the core list (4); and funds raised through any policy changes must be reinvested into the waste infrastructure system/waste education (4).

### **Proposal 3: review and expansion of the core set of dry recyclables**

We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that a) evidence supports the benefits, b) there are viable processing technologies for proposed materials, c) there are sustainable end markets, d) local authorities would not be adversely affected, including financially.

**Question 15: Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?**

- yes: **502 responses (95%)**
- no: **9 responses (2%)**

- not sure, don't have an opinion, not applicable: **14 responses (3%)**
- not Answered: **6 responses (1%)**

Figure 11 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is some variation by organisation type but for each organisation type the percentage of responses that agree is above 88% and the total across all organisation types is 96%.

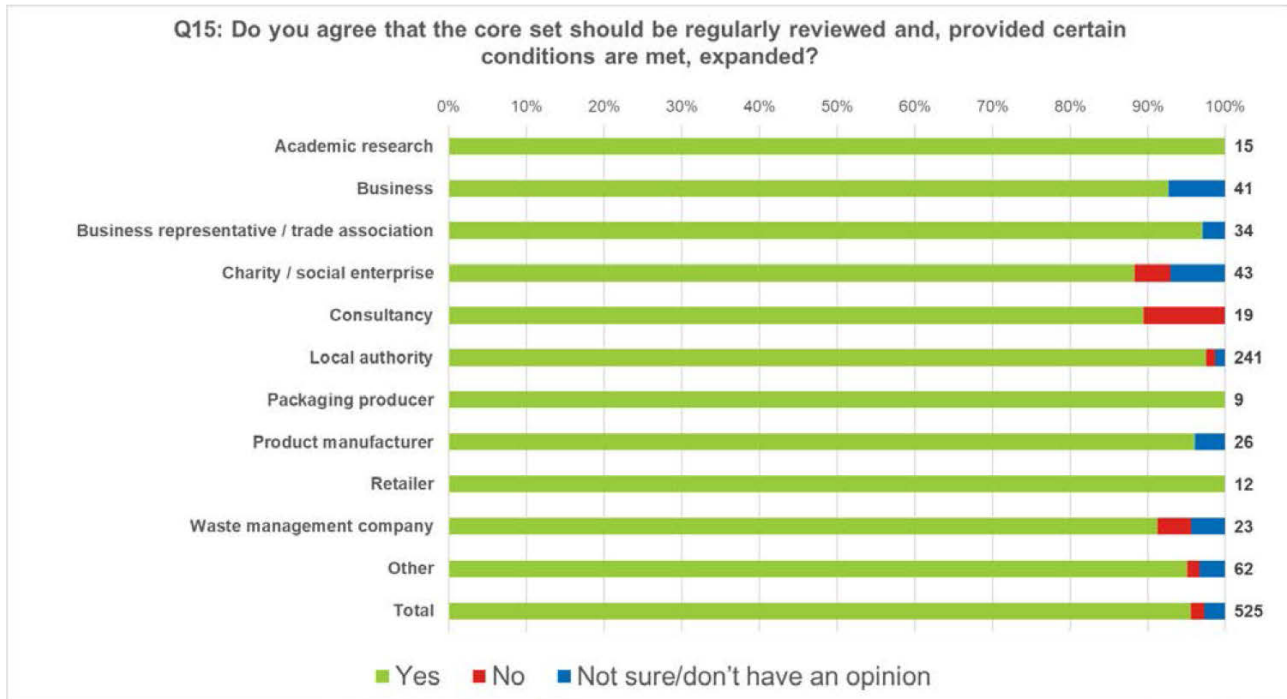


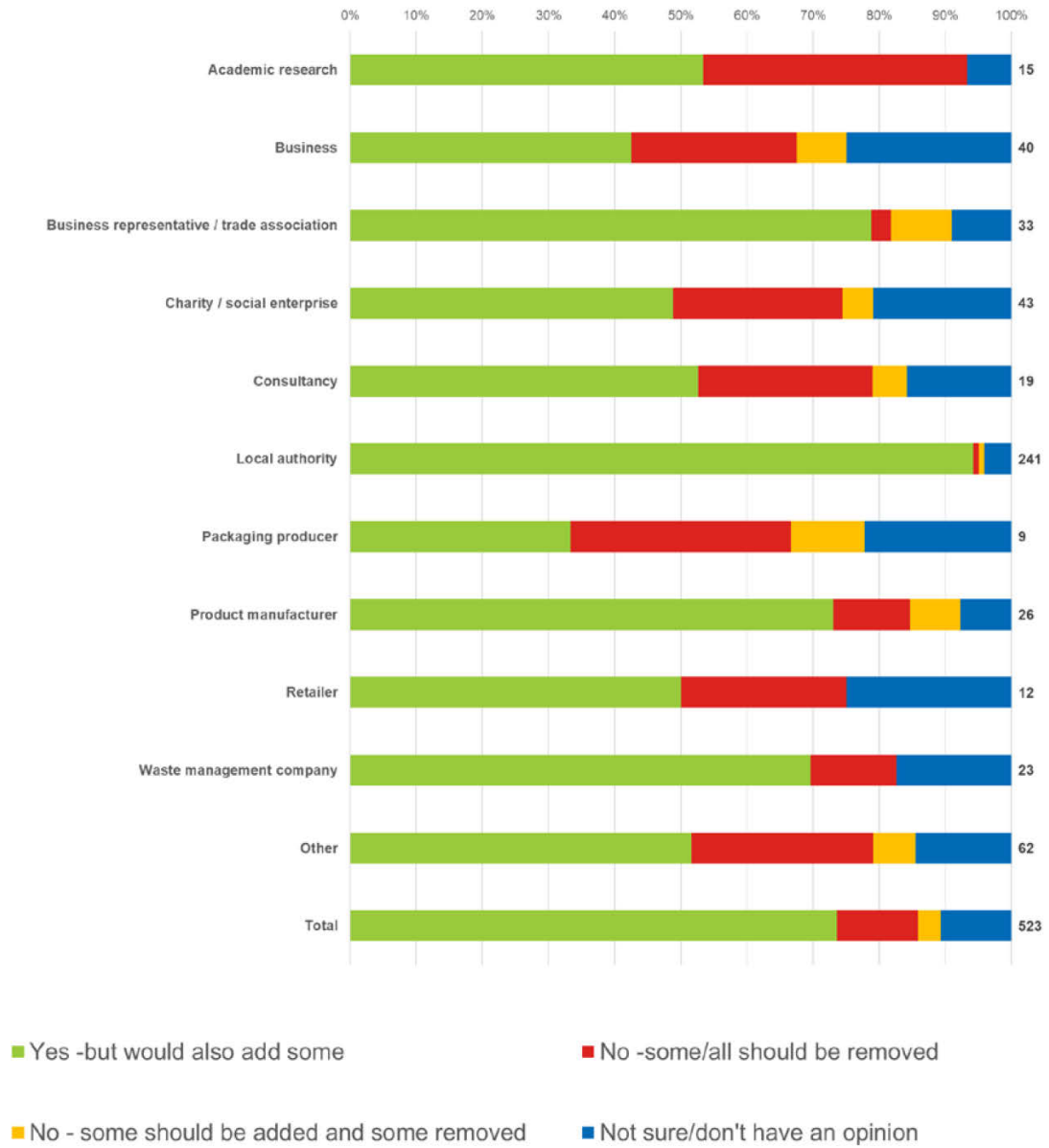
Figure 11: Q15 analysis for answered responses

**Question 16: Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?**

- yes- but would add some: **385 responses (73%)**
- no, some/ all should be removed: **64 responses (12%)**
- not sure, don't have an opinion, not applicable: **56 responses (11%)**
- no some should be added and some removed: **18 responses (3%)**
- not Answered: **8 responses (2%)**

Figure 12 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered). There is variation by organisation type with the percentage of responses that Agree varying between 33% and 94%, and the total being 74%. Responses that Agree from organisations that identify as packaging producers were notably lower at 33% (although this only represents 3 responses), contrast, 94% for Local Authorities (227 responses).

**Q16: Do you believe that the proposed conditions a) b) c) and d) above are needed order to add a core material?**



**Figure 12: Q16 analysis for answered responses**

**The following additional information was provided in the free text box.**

Those stated answered “Yes- but would add some”, indicated the following:

- 33 recommendations/comments

- a key issue raised was that regional sorting capacity and transport implications be taken into consideration (16)
- health and safety implications included (6)
- air pollution assessment included (5)
- processing technology should be in the UK (3)
- closed loop/waste hierarchy considered (2)
- practical aspects considered (space for additional vehicles, material bulking, etc.)

Those stated answered “no, some/ all should be removed”, indicated the following:

- 81 recommendations/comments
- the majority of these (36) indicated that d) should be removed and a further 8 said cost should not be a barrier
- it should be based on a sustainability/environmental assessment and this was more important than increased costs (14)
- government need to invest in processing and infrastructure to mitigate financial impact (11)
- remove c) (3)
- remove b) (2)
- remove all (1)
- rephrase d) (1)
- some increase in costs should be accepted (1)
- recycling should be obligation and no get outs provided (1)

Those stated answered “no, some/ all should be removed”, indicated the following:

- 18 recommendations/comments
- of these (6) indicated that d) should be removed or rephrased
- prioritising the environment (2) and basing analysis on LCA/ environmental assessment (2)
- keep b)
- keep d)
- government prioritise recycling
- add materials that will not confuse householders too much.
- base on composition
- following simplification suggested (1): "a) the material can be recycled, b) the material will be recycled, c) there is a sustainable pull factor, d) the producer of the material will support collection and recycling, including financially."

## **Question 17: Do you have any other comments to make about Proposal 3?**

229 comments were categorised into 23 substantive suggestions. The vast majority of these (153) were from local authorities.

Of the most frequently cited comments, 77 respondents (34%) of which 71 were local authorities, felt that it was essential that the changes should not financially burden local authorities and that they should not be penalised for improvements made in the past (39 respondents, 17%). Sufficient time to allow local authorities to prepare and adapt to changes was also noted as a secondary issue (17 respondents).

The second most frequent comment was that it would be important to review changes in the context of other proposals and legislation such as EPR and the Plastic Tax (60 respondents, 26%).

Two key issues that received equal numbers of comments (41 respondents, 18%) were that clarity would be needed on who would determine the new materials (government versus PRN body etc.) and that additional clarity was needed on what the term 'regular' meant (with respondents pointing out that the reviews must not be too frequent or bureaucratic). Additionally, 26 respondents pointed out that too frequent changes would cause confusion and uncertainty.

37 respondents commented that it would be essential for the government to promote the use of end-products to encourage demand. The importance of publicity and communication campaigns was cited by 33 respondents, and the importance of enhancing the processing infrastructure was a key consideration for 27 respondents.

Geographical and demographic differences among local authorities were felt to be important considerations with 26 of the respondents commenting on the need for the changes to reflect these.

15 respondents felt that producers should take more responsibility and that packaging should be restricted to recycled materials only.

In relation to adding new materials to the list, 8 respondents felt that it was key to demonstrate that they were actually required. In addition, 13 respondents noted that it was also important to remove materials from the list if set conditions ceased to apply. Adding new materials to the list that were not widely processable was felt by 12 respondents to potentially improve the cost effectiveness of new processing technologies.

# Food Waste

## Proposal 4: weekly separate food waste collections

By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners

### Question 18: Which aspects of the proposal do you agree or disagree with?

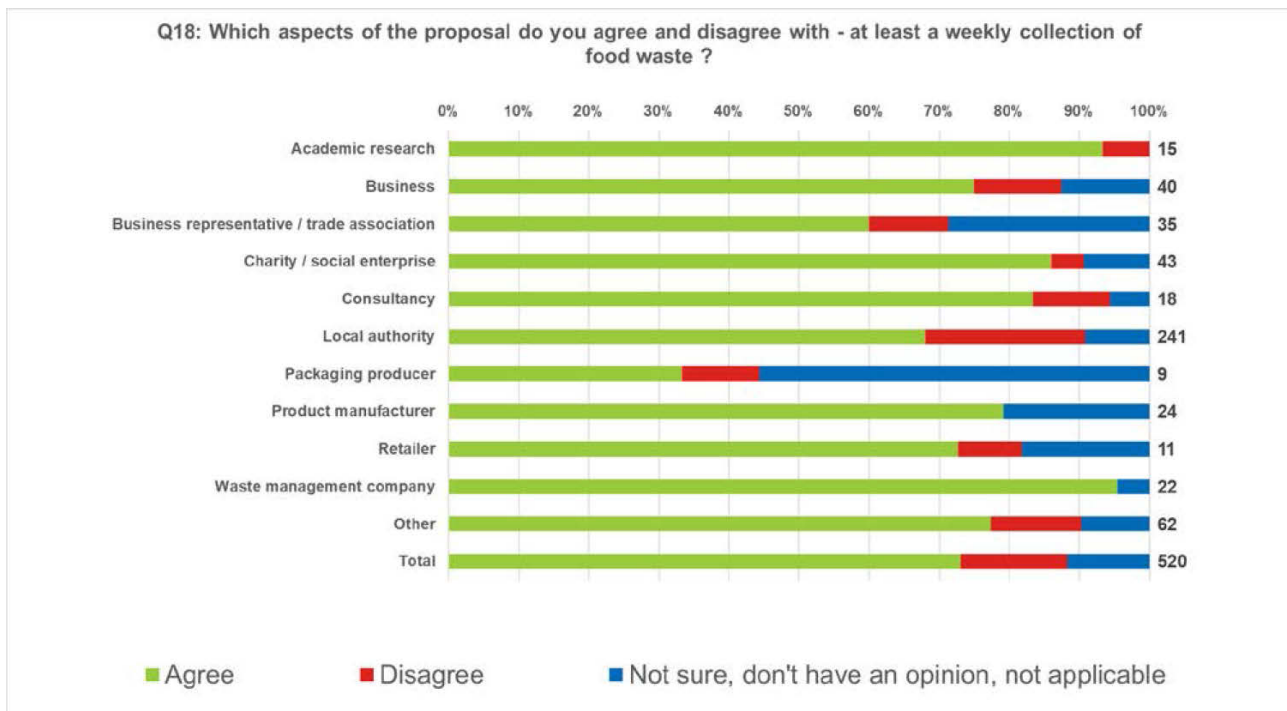
- at least a weekly collection of food waste
- a separate collection of food waste (i.e. not mixed with garden waste)
- services to be changed only as and when contracts allow
- providing free caddy liners to householders for food waste collections

#### At least weekly collection of food waste

- agree: **380 responses (72%)**
- disagree: **79 responses (15%)**
- not sure, don't have an opinion, not applicable: **61 responses (11%)**
- not answered: **11 responses (2%)**

Figure 13 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). For each organisation type the percentage of responses that agree varied significantly with a range between 33% and 95%, and the total being 73%. Responses that agree from organisations that identify as packaging producers were notably lower at 33%, in contrast, 95% of waste management companies agree.



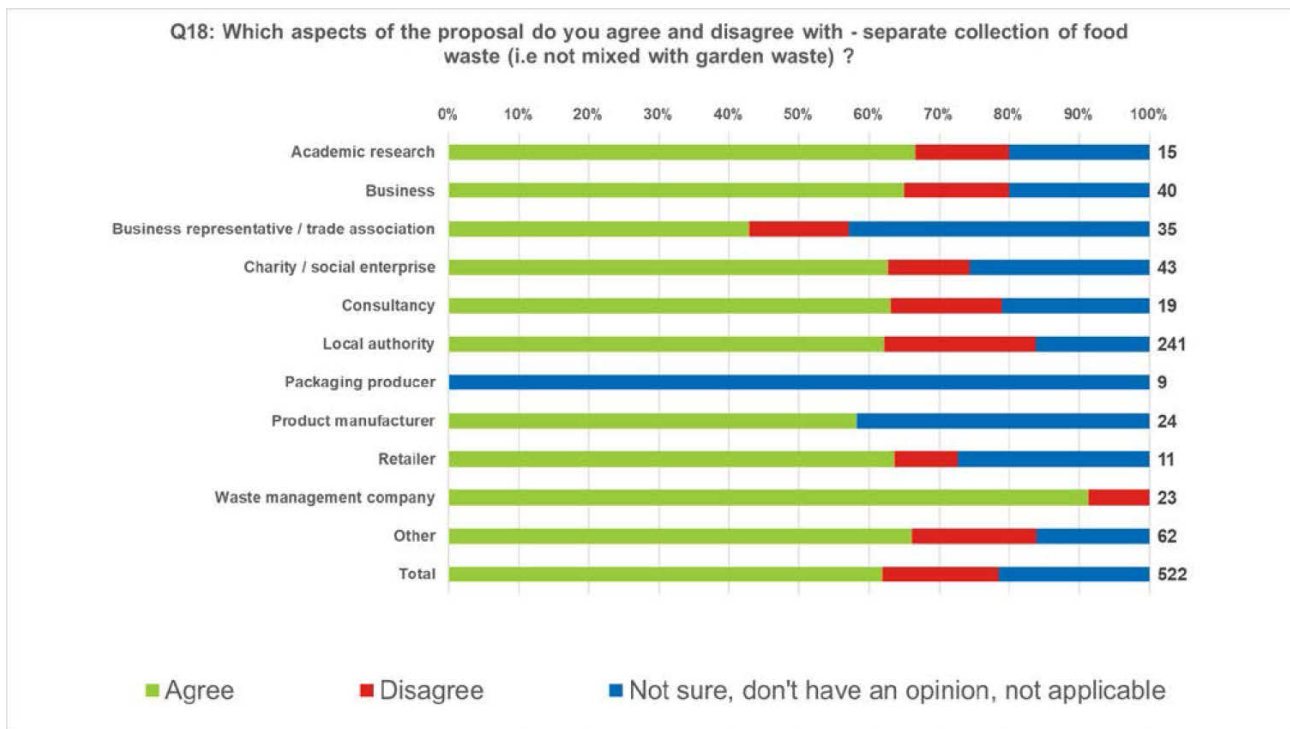


**Figure 13: Q18 analysis for answered responses- at least weekly collections**

**Separate Collection of food waste i.e. not combined with garden waste**

- agree: **323 responses (61%)**
- disagree: **87 responses (16%)**
- not sure, don't have an opinion, not applicable: **112 responses (21%)**
- not answered: **9 responses (2%)**

Figure 14 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). In total 62% of respondents agree with the proposal for separate collection of food waste. There is some variation by organisation type with waste management companies (91%) agreeing compared to 62% of local authorities.

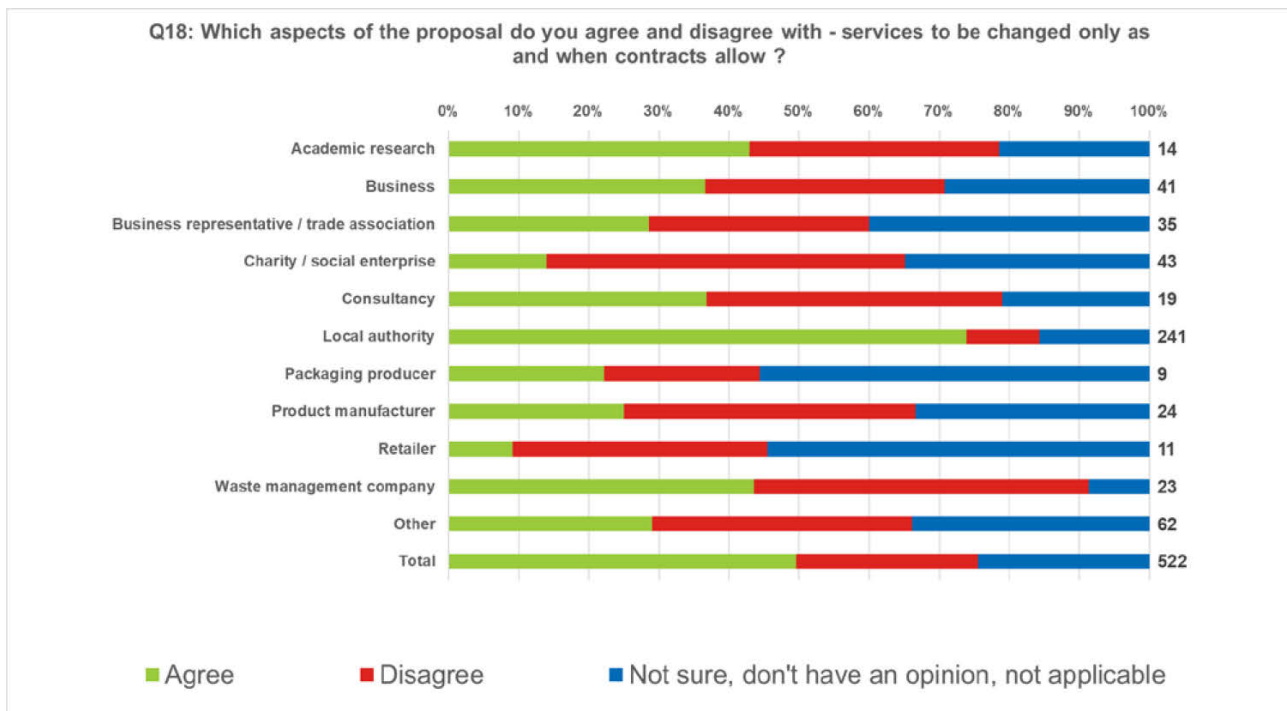


**Figure 14: Q18 analysis for answered responses- separate collections**

**Services to be changed only as and when contracts allow**

- agree: **259 responses (49%)**
- disagree: **135 responses (25%)**
- not sure, don't have an opinion, not applicable: **128 responses (24%)**
- not Answered: **9 responses (2%)**

Figure 15 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is significant variation by organisation type, in particular local authorities have indicated a 74% agree response, which is considerably higher than other organisation types. The total across all organisation types is 61%.

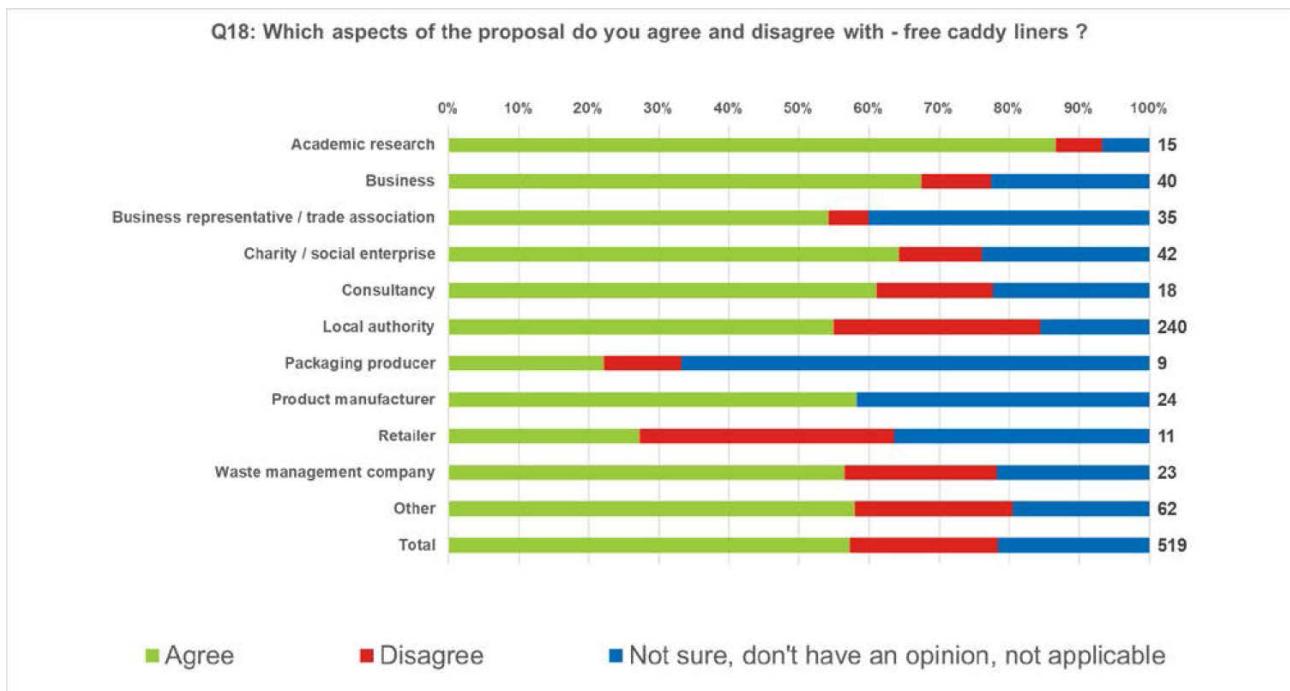


**Figure 15: Q18 analysis for answered responses – when contract allow**

### Providing free liners to householders

- agree: **297 responses (56%)**:
- disagree: **110 responses (21%)**
- not sure, don't have an opinion, not applicable: **112 responses (21%)**
- not answered: **12 responses (2%)**

Figure 16 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There is some variation by organisation type but, the use of liners is broadly favoured, with 57% of respondents stating they agree. Notably 87% of academic research organisation and 55% of local authorities agree, but only 22% of packaging producers.

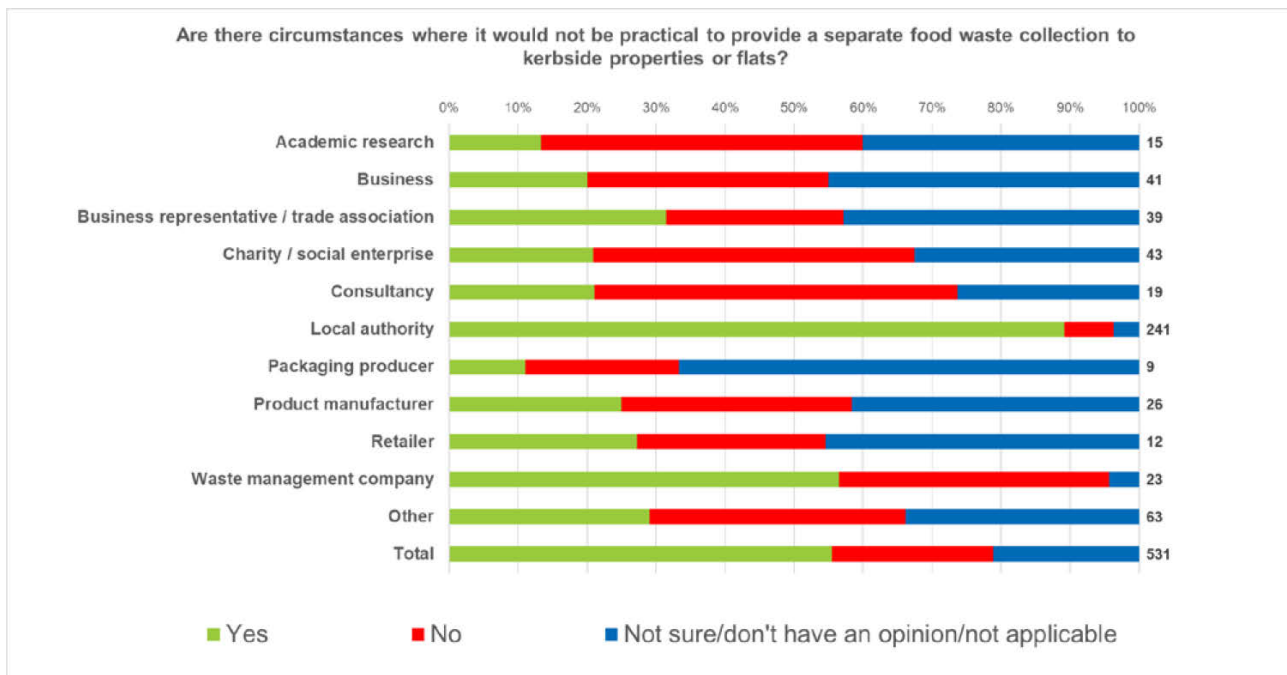


**Figure 16: Q18 analysis for answered responses- liners**

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

- no: **122 responses (23%)**
- yes: **289 responses (54%)**
- not sure, don't have an opinion, not applicable: **110 responses (21%)**
- not answered: **10 responses (2%)**

Figure 17 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Notably 89% of local authorities believe that Yes there are circumstances in which separate food waste collection would not be practical. This is significantly higher than other organisation types. In total 54% of respondents provided a yes response.



**Figure 17: Q19 analysis for answered responses**

Of the respondents that answered yes, 253 provided some additional information in the text box, which accounted for 467 points raised. 140 identified flats, HMOs and flats above shops in general and related to providing collection from these the following key reasons were also identified:

- storage and space issues for bulk containers (107)
- misuse of bulk collection containers and thus high levels of contamination prevalent (61)
- concerns around vermin, odour and unhygienic bulk collection areas (30).

Other reasons/suggestions raised were:

- rural areas where collections may not be economically viable (25)
- funding for introduction of service required (22)
- housing/streets where there is difficult vehicle access (15)
- area where there is insufficient treatment capacity and thus result in significant travel times (15)
- areas with sack collections should be exempt (10)
- respondents suggest that it should be for individual local authorities to decide (9);
- where there is likely to cause impact on residual treatment facilities i.e. organic content going into an MBT facility or changes to the Calorific Value of waste to a EfW (7)
- a full environmental assessment should be conducted to see if it would be beneficial (7)
- terraced and back to back houses difficult to service (6)

- operational constraints such limited transfer/bulking capacity and storage of vehicles in depots (6)
- concerns around anti-social behaviour i.e. knocking over (3) of food waste caddies and related to this is caddies causing trip hazards (2)

Four respondents also noted the following:

- there is an apparent contradiction between Proposal 4 in the main consultation document and the Executive Summary of the Impact Assessment. Proposal 4 refers to "all kerbside properties and flats" having at least a weekly separate food waste collection. However, the Impact Assessment refers to the preferred option 3M, in which only low rise properties are required to have separate food waste collections. This requires clarification. Uncertainty over this requirement will have significant implications for service provision costs

## **Question 20: Do you have any other comments to make about Proposal 4?**

354 respondents provided 931 comments which were categorised into 41 specific considerations or challenges. Local Authorities provided by far the most comments (735).

81 comments raised the issue of the need for improved provision of reprocessing facilities; there is a concern that the current AD plants would not be able to cope with the volume of food waste which would be generated by the proposal. There would also be a requirement for additional or upgraded bulking facilities and transport, and it was noted that these would require funding. 2 comments suggested that the estimate of food waste currently sent to landfill is over-stated. A further 88 comments noted the need for the introduction of and funding requirements of improved collection infrastructure, including containers and specialist vehicles, with particular mention of the issue of adaptations for properties such as flats with limited space for containers. 5 comments noted that the current planning regulations need to be updated to ensure sufficient space in communal flats areas for recycling containers, retrospectively if possible.

Caddy liners gave rise to comments in several categories; 80 comments noted the benefit of providing caddy liners in maximising participation but emphasised that these should be of a material consistent with reprocessors' requirements, whether plastic or compostable; it was noted that this may differ between AD plants. However, 28 comments suggested that the provision of free caddy liners was unnecessary, with 2 comments suggesting that further evidence is required that caddy liners improve food waste yields.

4 comments suggested that the supply of caddy liners should be means tested. 50 comments noted the cost implications of providing caddy liners, including delivery; it was emphasised that the funding for this provision would need to be a long-term commitment.

6 comments queried whether compostable plastics could be included with food waste. 2 comments suggested the option of localised on-site AD or composting for flats and

communal properties. 3 comments noted the likely associated benefits to contamination levels of dry recycling, whilst 3 comments raised concerns regarding the potential for increased exposure of crews to bioaerosols arising from separate food waste collections.

34 comments suggested that co-collection of food and garden waste should be allowed, as this would utilise existing IVC facilities and would allow for the development of dry AD, which can accept this mix. 10 comments highlighted the practical and cost benefits of co-collection with garden waste. 15 comments raised concerns regarding negative public reaction to post-collection mixing of food and GGW.

47 comments raised concerns that for rural and flats collections, where yields are low in comparison to the operational collection requirements, the sum of the cost, environmental and carbon implications of these collections should be explored. A further 37 comments suggested that exemptions should be permitted where practical barriers make collections impractical, including flats above shops, constrained access, very rural properties and locations where containers are heavily contaminated. 20 comments suggested that these type of locations could lead to issues regarding odour, vermin & street litter, whilst 11 comments suggested the introduction of additional enforcement powers for participation, particularly in flats and 2 comments suggested financial incentives (Council Tax based) for participating residents.

56 comments highlighted the potential difficulties regarding the inflexibility of current contracts for collection or disposal, noting that financial penalties could be incurred which would require funding; 76 comments focussed on the impact on current disposal routes which would be adversely impacted by the removal of food waste (MBT reliance on biological content of waste, EfW calorific value, contractual tonnage agreements) and the financial impact.

18 comments noted that reductions in the frequency of other collections, particularly residual, would impact positively on food waste yields, but the strategy potentially limits the options for this; 21 comments felt that decisions on recycling schemes should be left to councils under the localism agenda.

72 comments expressed concerns regarding the methodology for calculating the new burden funding and questioned its duration. 10 comments expressed concerns that Defra's calculation of costs underestimated the true total. 11 comments were concerned about disproportionate funding, whereby councils who had already funded food waste collections would not be retrospectively funded, whilst late adopters would be fully funded.

75 comments suggested that food waste minimisation should be the highest priority, including home composting, with potential for supply of home composting equipment; 44 comments highlighted the need for provision and funding of education, communication and engagement with residents.

1 comment suggested that food waste should be collected twice weekly due to odour, whilst 6 suggested that collections could be less than weekly except in the summer.

6 comments suggested mandatory food waste collections should also apply to businesses; comments were also received suggesting participation in food waste recycling should be compulsory (1), a standard colour should be adopted for food waste containers and liners (1), participation should be opt in only (1), a similar scheme should be provided for cooking oil (1), and collections should be expanded to include garden waste (1).

## Proposal 5: funding of infrastructure

We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

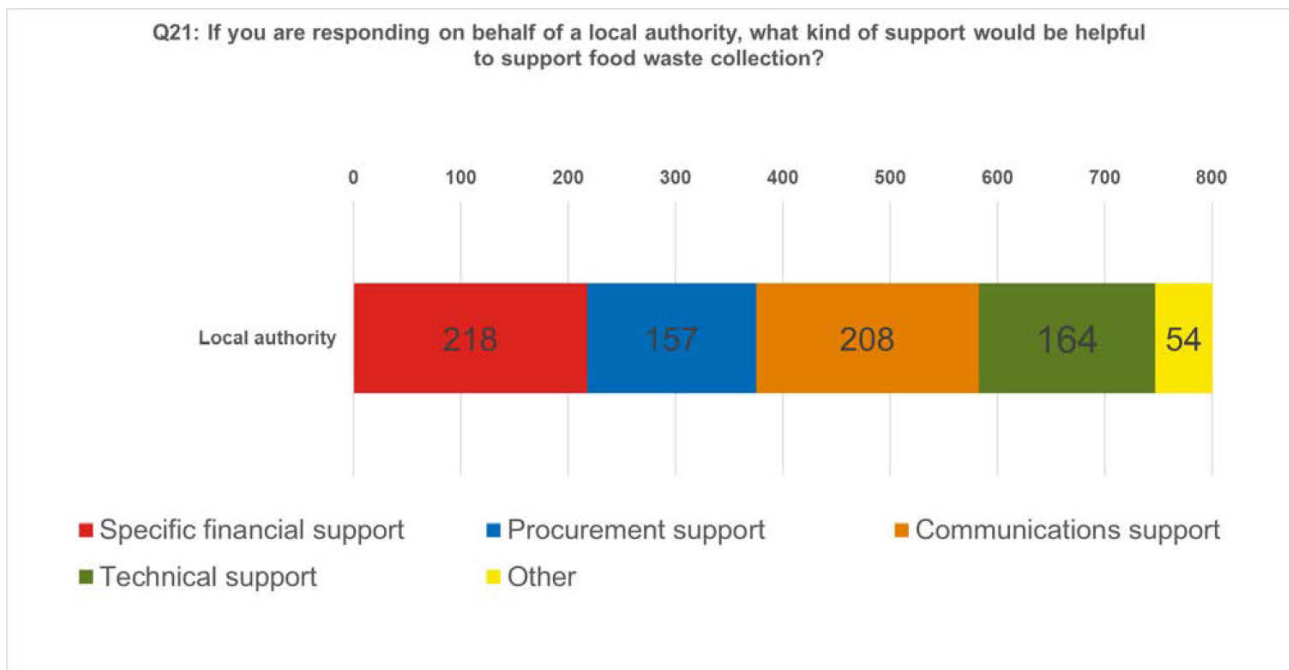
**Question 21: If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)**

The following analysis represents Local Authority responses only.

- specific financial support: **218 responses (27%)**
- procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers): **157 responses (20%)**
- communications support, (e.g. free collateral that can be adapted and used locally): **208 responses (26%)**
- technical support, (e.g. free advice from a consultant about round re-profiling): **164 responses (20%)**
- other: **54 responses (7%)**

Figure 18 shows the number of responses for each type of support. Respondent were permitted to select as many as they would like. Given the number of Local Authorities who have taken part in the consultation (241) there would appear to be considerable appetite for each type of support suggested, with financial support gaining the highest response at 218, shortly followed by communications support (208).





**Figure 18: Q21 what kind of support would be helpful to support food waste collection?**

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

309 comments were categorised into 86 substantive suggestions. The vast majority of these (217) were from local authorities.

Only one respondent disagreed with the proposal outright. 55 respondents referred to the waste hierarchy and the importance of prioritising food waste prevention. 22 respondents requested further cost benefit analysis.

97 responses stated that funding should be sufficient to cover all costs. Funding requests were made for a range of factors covering both capital (up-front and transitional costs) and ongoing revenue costs. 80 responses requested that funding be on-going, further responses related to revenue funding for containers, caddy liners, fleet replacement, staff and gate fees. 68 respondents flagged caddy liners and their distribution requesting that these should be funded on an ongoing basis (4 responses stated that liners are unnecessary and one requested plastic bags be used). 95 responses related to vehicles and their associated revenue costs including licences, drivers and depot space.

Items of capital expenditure referenced included vehicles, containers, infrastructure and IT systems. Transitional support for rerouting, planning, contract renegotiations and procurement were requested. Impacts on other services and the need to redesign the entire collection system was flagged by 17 respondents. Technical support for the transition was requested by 26 respondents. Procurement support was requested, and 12 responses requested centralised support for procuring the necessary infrastructure. The risk that many Local Authorities implementing the system simultaneously may lead to impacts on infrastructure capacity, gate fees and prices was flagged in this context.

57 respondents raised concerns about existing contracts from long-term PFI contracts to collection contracts that aren't coterminous with the planned date for the requirement.

74 responses noted the need for appropriate treatment infrastructure. The impact on existing infrastructure was raised by 30 respondents; this included impacts on existing MBT and IVC facilities and EfWs. 39 responses flagged that they would need support with transfer stations and haulage. 8 responses flagged that it will take time to get the appropriate infrastructure in place. 8 responses suggested that MBT and IVC should be considered alongside AD. 14 responses related to the need for markets for the digestate from AD facilities in order to differentiate AD from EfW (Many of these respondents also linked this to risks relating to nitrate protection zones).

The additional costs relating to provision of food waste to flats was raised by 27 respondents.

The most common response (116 responses) was that continuous communications are important for uptake and continued viability of food waste collections and should be funded. 15 responses requested a national communications campaign.

Clarity on the funding source was requested by many respondents. 55 responses flagged that food waste collections would be a new burden and that funding should not be taken from existing Local Authority budgets. 57 responses requested that funding be offered to local authorities that already operate food waste collections. 31 responses asked for clarity on the source of funding – many linking this to EPR or PRNs. 26 responses asked that funding be ring-fenced either explicitly for food collections or for waste departments. 10 respondents stated that it should be up to local authorities to choose how EPR funding is spent. 8 respondents (of which only 1 was a local authority) stated that EPR funding should not be used to pay for food waste collections. 12 respondents stated that Local Authorities need to understand how food waste would be funded before making decisions. 8 responses requested that any funding is Local Authority specific rather than formula based.

16 authorities flagged that the funding required to implement separate food waste collections would be significant; with 11 respondents sharing NAWDO's view that the £20 million cost quoted in the impact assessment could be far too low. A number of authorities quoted analysis they had undertaken relating to potential costs.

9 respondents also questioned the anticipated food waste yields suggesting that actual yields could be lower than anticipated. 18 responses referred to evidence that yields tail off once systems bed in and that there were links to waste prevention messaging. 15 responses related to the link between food waste yields and the need to reduce residual waste collection frequency.

23 respondents questioned the assumption that weekly food waste collections would be coupled with weekly dry recycling as this is not currently the practice for many authorities. 3 authorities flagged that they had stopped co-collecting food waste and implemented

separate food waste fleets due to tipping logistics and that this had reduced fuel and mileage.

15 responses related to the benefits of working with the entire supply chain.

A number of other issues were raised by less than 5 respondents including funding incentives (for AD facilities and householders), support for enforcement, electric vehicles, lost income from garden waste, funding needed soon, how will funding work in two tier areas, monitoring, waste composition analysis needed, share best practice, should cover recycling on the go.

## **Proposal 6: separate presentation of food and garden waste**

We believe it would be desirable for local authorities that have contractual commitments with in-vessel composting (IVC) facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

### **Question 23: What are your views on this proposal?**

347 respondents (65%) provided a substantive response to Q23. Among them, the picture was quite balanced, with 153 (44%) agreeing with the proposal and 133 (38%) disagreeing. The rest expressed opinions on what matters but did not present a clear opinion for or against.

Of the 189 local authorities that responded with a clear preference, 95 (60%) disagreed with the proposal. In contrast, over 70% of the clear preferences received from each of the groups of academic research, business, retailers, waste management companies and 'other' were in favour of the proposal.

59 respondents (17%) thought that action should be based on the evidence available, with 21 of them agreeing to the proposal on the proviso that the evidence was sound. In contrast, 9 respondents (3%) challenged the evidence presented, with 7 going on to disagree with the proposal.

By far the most significant concern, expressed by 103 respondents (30%), was that collecting food waste and garden waste separately and then recombining them for treatment would jeopardise public confidence in the value of sorting their waste. Terms used included 'transparency issues', 'sending a bad message', 'reputational damage' and even simply 'dishonest'. Among these 103 are 12 who agreed with the proposal overall, but still saw this as a significant issue that would need very careful management.

53 respondents (15%) believe that the proposal would cost extra money, and 11 of those added that they thought that government should cover the increased cost.

Another commonly received opinion, from 45 respondents (13%), was that any combining of separately collected organic wastes should only continue for a limited time, until better plans can be arranged.

Smaller numbers of responders expressed concerns about the possible impacts of mixed collection frequencies (15) and the number of containers required (10).

## Garden waste

### Proposal 7: free garden waste collections

We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision

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

- a free garden waste collection for all households with gardens
- a capacity to 240l (bin or other container e.g. sack)
- a fortnightly collection frequency (available at least through the growing season)
- ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement
- this new requirement to start from 2023 (subject to funding and waste contracts)

#### A free garden waste collection for all households with gardens

- agree: **203 responses (38%)**
- disagree: **222 responses (42%)**
- not sure, don't have an opinion, not applicable: **95 responses (18%)**
- not answered: **11 responses (2%)**

Figure 19 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Responses were marginally more in disagreement (42%) than agreement, with 71% of Local Authorities disagreeing (the largest majority amongst the respondents).

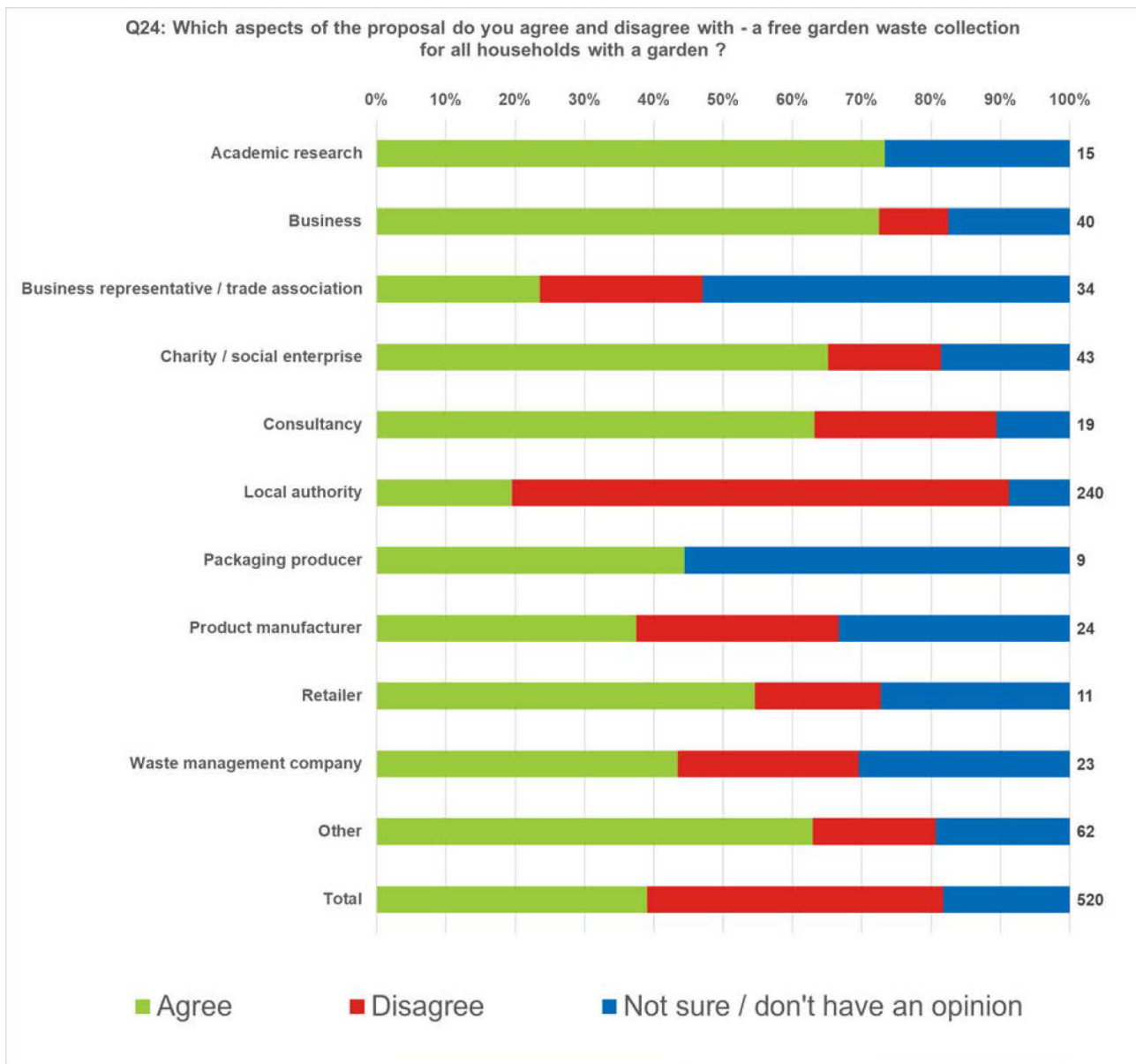


Figure 19: Q24 analysis for answered responses - free garden waste collection

### A capacity of 240l (bin or other container e.g. sack)

- agree: **302 responses (57%)**
- disagree: **100 responses (19%)**
- not sure, don't have an opinion, not applicable: **120 responses (23%)**
- not answered: **9 responses (2%)**

Figure 20 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). The majority of organisations (58%) agreed with the capacity suggested with a greater number not sure/no opinion than disagreeing. 54% of Local Authorities respondents agree and 70% of waste management companies agree with the capacity.

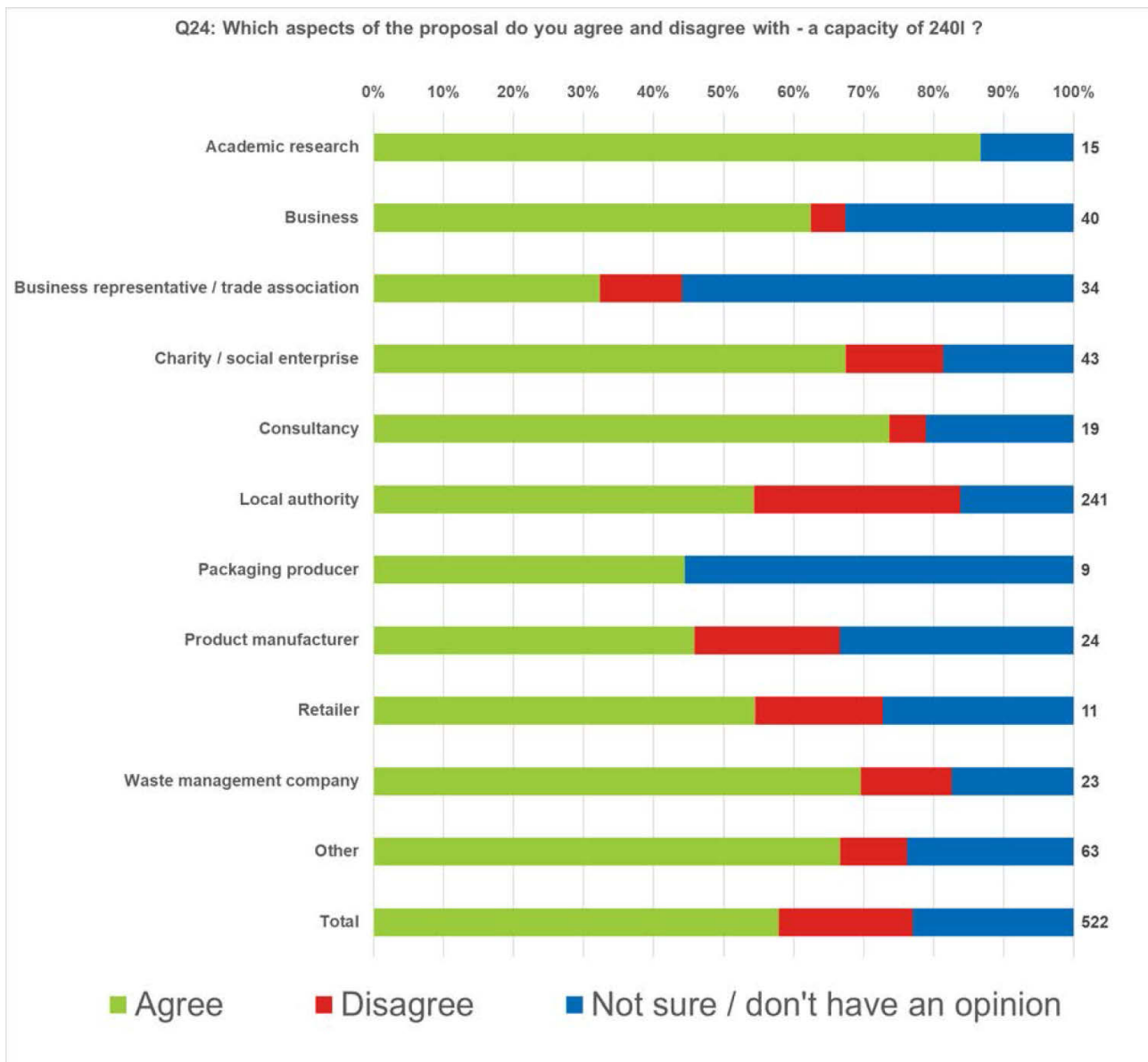


Figure 20: Q24 analysis for answered responses - A capacity of 240l

**A fortnightly collection frequency (available at least through the growing season)**

- agree: **362 responses (68%)**
- disagree: **65 responses (12%)**
- not sure, don't have an opinion, not applicable: **93 responses (18%)**
- not Answered: **11 responses (2%)**

The majority of respondents (70%) agreed with the collection frequency, with 68% of local authorities agreeing and 21% disagreeing.

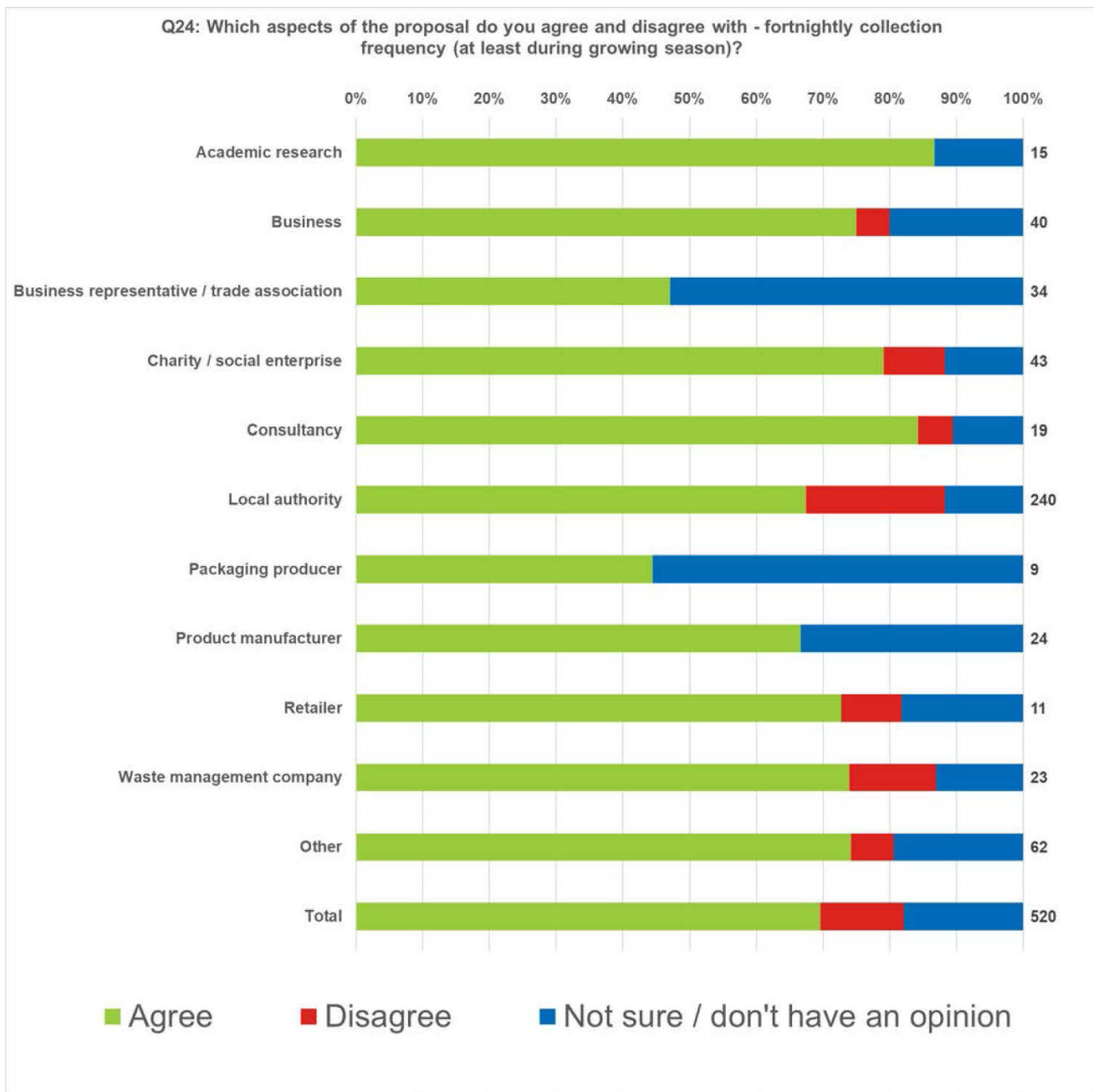


Figure 21: Q24 analysis for answered responses - fortnightly collection frequency

### Ability to charge households for additional capacity / collections / containers over the set minimum capacity requirement

- agree: **379 responses (71%)**
- disagree: **45 responses (8%)**
- not sure, don't have an opinion, not applicable: **96 responses (18%)**
- not answered: **11 responses (2%)**

Figure 22 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). The majority of respondents (73%) agreed with having the ability to charge households for aspects beyond the set minimum requirement.

Of these 79% of Local Authorities agreed. The largest disagreement of 16% was from the charity/social enterprise sector.

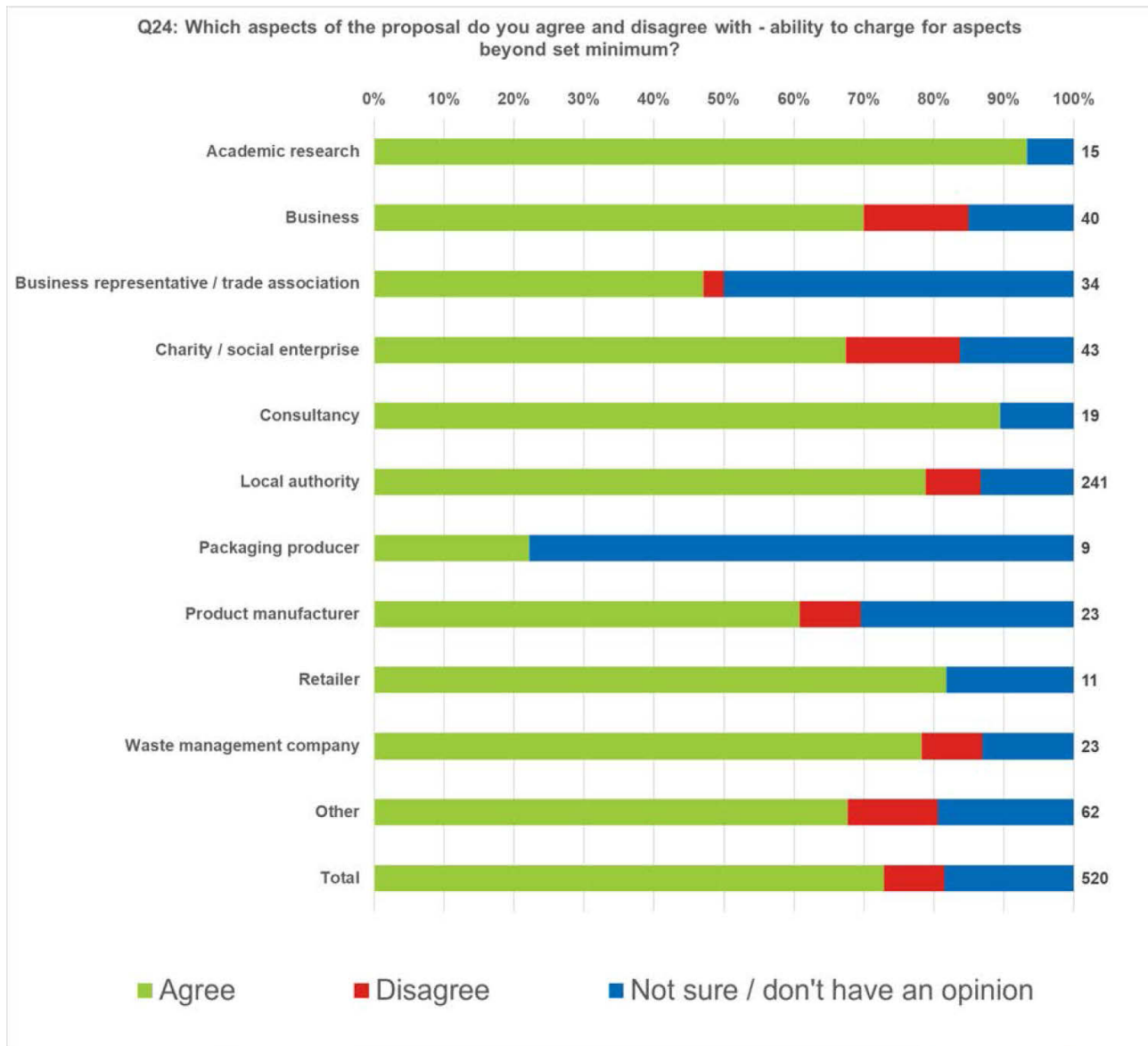


Figure 22: Q24 analysis for answered responses - Ability to charge

### New requirement to start from 2023 (subject to funding and waste contracts)

- agree: **195 responses (37%)**
- disagree: **177 responses (33%)**
- not sure, don't have an opinion, not applicable: **147 responses (27%)**
- not answered: **12 responses (2%)**

Figure 23 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Respondents had mixed views on this question, 37% overall Agree that the new requirement should start from 2023 and 33% disagreeing. From the stakeholder responses, 26% of Local Authorities agree and 46% disagree. Whilst



61% of waste management companies and 79% of consultancies were in agreement with starting from 2023.

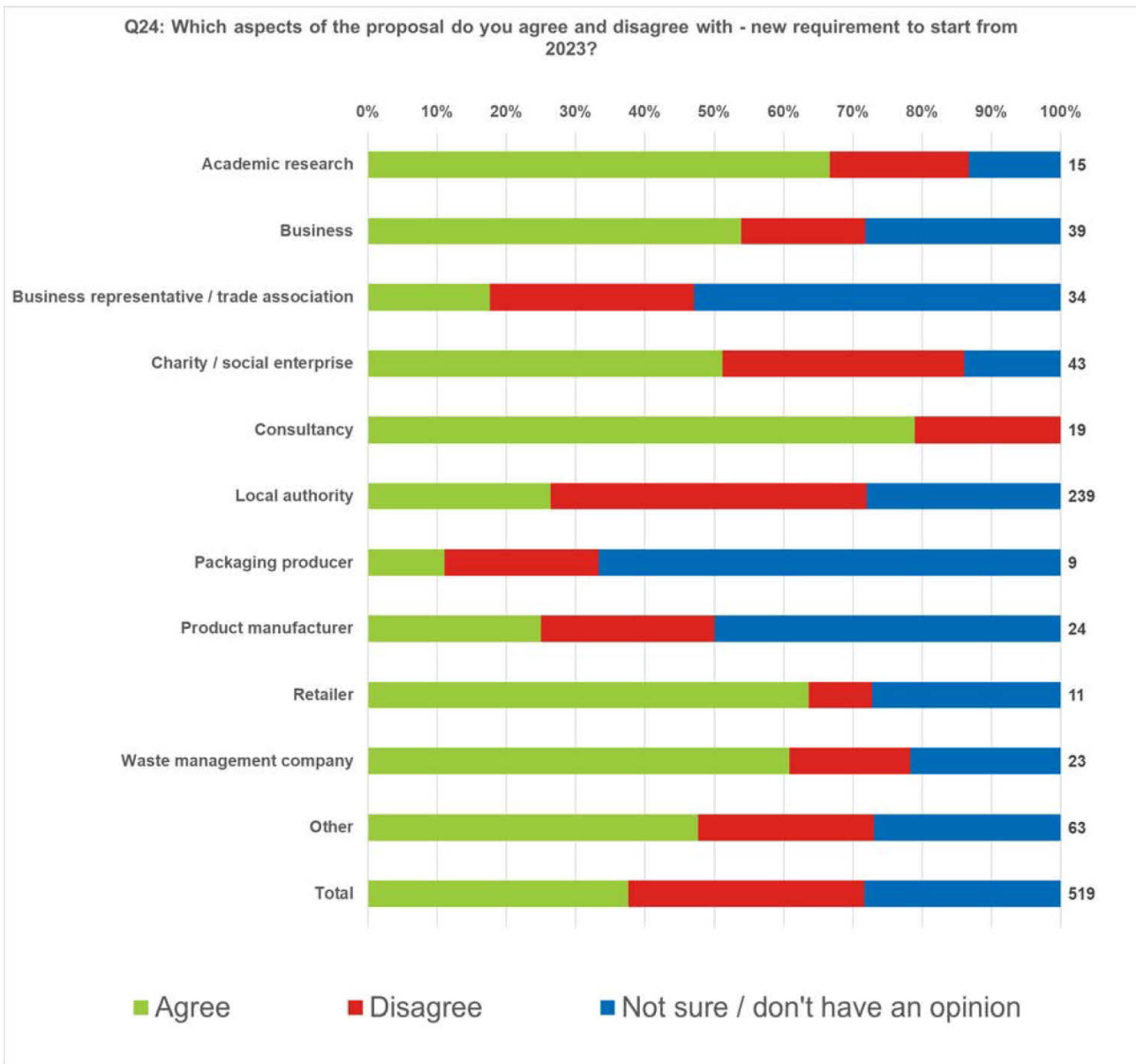


Figure 23: Q24 analysis for answered responses - New requirement to start from 2023

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

417 comments were categorised into 80 substantive categories. The vast majority of respondents (230) were from local authorities.

While 12 respondents indicated they thought it was important to take up a full free garden waste service 57 (42 from local authorities) indicated that they are against the idea and disagree with providing a free garden waste collection.

The most common concern raised (107 responses) was regarding the economic and budgetary implications of introducing a scheme. The concerns raised included the potential loss of income from current schemes that are charged for where the revenue generated is used to supplement existing services.

A notable opposition to the provision of the free service, (57 respondents) indicated concerns that the system would effectively require those without gardens (which are often those in more deprived areas with low disposable income) to subsidise those with gardens. In addition, it was viewed that the ability for councils to charge householders for garden waste represents a more equitable charging regime, only applying to those who wish to use the service. It was noted that garden waste charging is a good example of the 'polluter pays' principle which underlies other government strategy and direction and potentially encourages home composting which is better for the environment.

27 respondents indicated concerns about the data and assumptions used not being reflective of local circumstances, further to that 21 responded that the autonomy of Local authorities to determine services should remain as the preferential option. 24 stated that they foresee no notable environmental impact or improvement from a full free garden waste service provision to households and 33 indicated that the implementation of such a scheme could undermine home composting and HWRC efforts. A further 67 respondents indicated that there should be encouragement of home composting including both with the possible introduction of a free service or as an alternative to the efforts of implementing a free service.

Regarding the provision of a free fortnightly service:

- 63 responses indicated that it should start sooner/timeline for introduction was too long
- 17 supported the use of bins over sacks for a garden waste service
- 21 noted that there should not be a prescribed or minimum size receptacle specified to ensure suitability of the service for individual users
- 14 indicated concern in regard to contamination of the stream as it would provide households with additional capacity and opportunity to incorrectly dispose of residual waste
- 10 noted it should be an all year-round service and 4 indicated monthly collection preferences
- 19 indicated that long term funding would be needed to sustain a collection system

# Separate collection

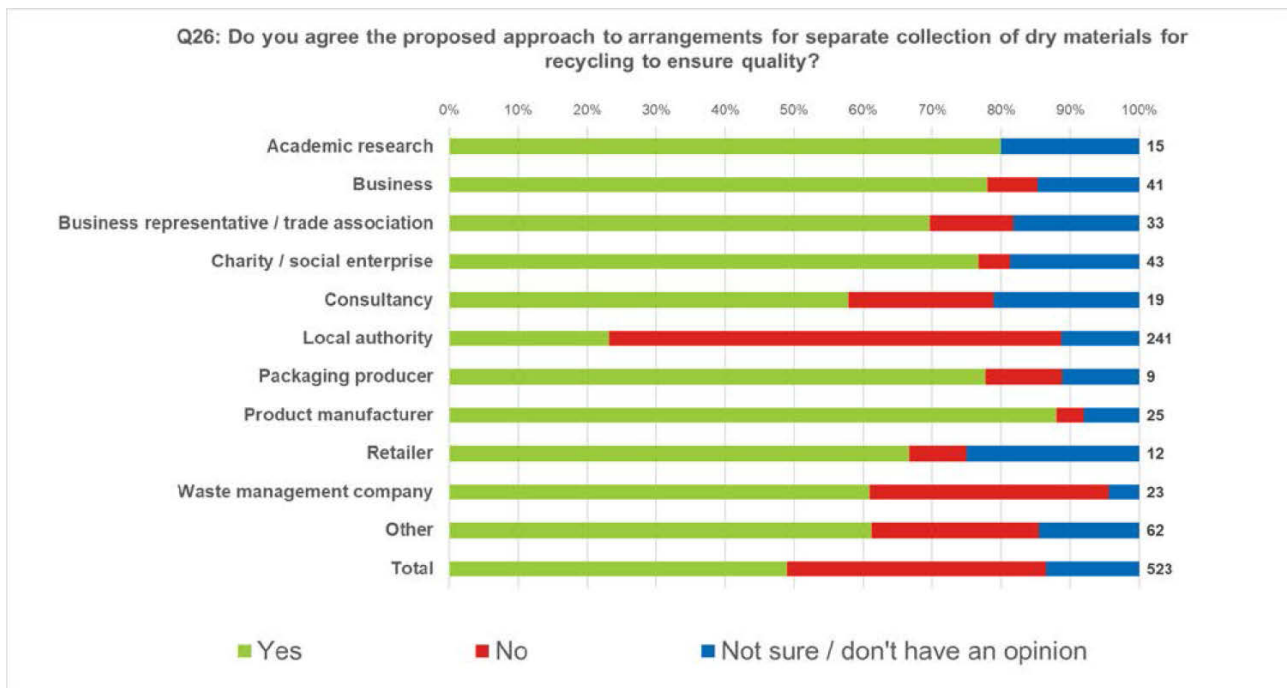
## Proposal 8: separate collection and statutory guidance on minimum service standards

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

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

- yes: **256 responses (48%)**
- no: **197 responses (37%)**
- not sure, don't have an opinion: **70 responses (13%)**
- not answered: **8 responses (2%)**

Figure 24 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). In total 49% of respondents agree with the proposed approach for separate collection of dry materials for recycling. Product manufacturers (85%) and packaging producers (78%) strongly agreed with the proposed arrangements but Local Authorities (66%) strongly disagreed.



## Figure 24: Q26 analysis for answered responses

### **Question 27: What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.**

335 respondents provided 991 comments which were categorised into 33 substantive suggestions. Most of these comments (676) were provided by local authorities.

A lack of storage space for containers was the reason mentioned by the greatest number of respondents, 167 (39%). This was largely mentioned in the context of heavily urban areas, where flats and multiple occupancy apartments with limited or no space for multiple bins/containers.

Many respondents 96 (22%) emphasised the increased funding costs associated with the introduction of separate collections required would be a significant barrier to separate collections. Whilst 73 (17%) respondents, of which 67 were local authorities, highlighted the increase in risks for collection staff. Many of the respondents highlighting this issue referred to a joint study by Glasgow Caledonian University and the University of Greenwich suggesting that separate collections involving boxes and bags may cause long-term musculoskeletal disorders to collection workers.

68 (16%) respondents brought up a lack of clear guidance / education available to the public as a preventative issue, highlighting a lack of knowledge regarding what items could be recycled or what days collections were on causing confusion and indifference in the public towards recycling.

The negative environmental impacts of a separate collection system were mentioned 65 times (15%), these included the effects that an increase of collection vehicles would have on; air quality, climate change (through increased emissions), noise pollution, and the visual impact of each household having multiple bins/containers outside.

51 (12%) respondents suggested that the public may find it difficult to properly separate materials, whilst 42 (10%) highlighted that the negative public reaction to having to adjust to a new system they are unfamiliar with may prevent proper separation. This was also highlighted with a further 42 suggesting public apathy as a hindrance.

41 responses suggested that the current infrastructure/facilities regarding; MRFs, waste transfer stations, and current road networks, may not exist or be equipped to deal with this separate collection of materials.

37 respondents mentioned that the current vehicles employed in collection services are not appropriate for the collection of separate materials, and would need to be either upgraded or replaced, at a significant cost. 28 respondents highlighted a lack of vehicles and staff, that would be required for this collection service.

Collections taking longer to carry out because of the materials being separate was mentioned by 33 respondents, with 31 highlighting an increase in traffic because of this time increase, coupled with more collection vehicles being on the roads.

34 respondents said that there is no reason why this type of service could not or should not work, many of these highlighting that the Welsh Blueprint for supporting separate collections has been implemented efficiently and delivers some of the highest recycling rates in the world.

A preference for a co-mingled collection service was mentioned by 26 respondents, mainly local authorities, with mention that they already provide this service and have found that rates of recycling and customer satisfaction are higher than under a separate collection service.

Contamination of bins/containers was mentioned by 25 respondents, many focusing on containers left outside in public being very susceptible to passers-by tossing in incorrect materials. Whilst 14 mentioned that open containers left outside are exposed to the weather, with potential for rain to contaminate cardboard materials, and wind potentially blowing waste out resulting in an increase in litter. 8 respondents mentioned that some materials may be too contaminated to recycle.

22 respondents included that this change may result in a reduction in the quantity of material collected for recycling.

15 respondents highlighted that elderly or infirm residents may struggle with having multiple bins/containers to take out. Whilst 13 highlighted that some items contained mixed materials and there would be confusion over how or if these could be separated. 12 of the responses mentioned the difficulty that rural areas pose due to remote locations of some properties and narrow roads hampering collection vehicles.

Further circumstances and the number of respondents mentioning them include; existing contracts with waste management companies needing to be acknowledged (12), a difficulty in specifying a single appropriate service type/frequency for regions (11), lack of consistency across authorities (8), lack of appropriate public bins (4), theft/loss of containers left outside (4), multiple separate waste streams from buildings (3), a lack of end markets for some products (2), need for frequency of deliveries to be the same (1), a need to assess the cost/benefit beforehand (1), technologies that can sort mixed waste are rapidly developing (1), and properties not being provided with the correct containers (1).

## **Question 28: Do you have any other comments to make about Proposal 8?**

283 respondents (53%) provided 565 comments which were categorised into 67 substantive suggestions. Most of these comments (439) were provided by local authorities.

A preference for a co-mingled collection system rather than separate system was the most frequent comment made by respondents, 82 (15%). Reasoning for this included; co-mingling increasing public participation due to it being a simpler method, along with the ability of existing MRF facilities to effectively sort waste.

Following this, the next major response was that local authorities should be able to choose their own collection system, 62 (12%). These responses often focused on the need for collections services being flexible not prescriptive, with differing areas requiring bespoke collection systems due to socio-economic reasons, or unfeasibility of kerbside sort in rural areas specifically mentioned by 3 respondents.

49 respondents emphasised that the increased costs of moving to a separate collection system would cause local authorities to struggle, suggesting that a system change should only happen if accompanied by adequate government investment. Cost issues regarding how the proposal would impact existing contracts needing to be assessed was mentioned 18 times. Whilst a need for a complete and robust assessment into all the costs and risks associated with a separate collection service was highlighted 13 times.

29 respondents commented issues associated with the increase in vehicles required for a separate collection service, with the increased cost frequently an issue in this regard. Along with traffic, environmental, and whether fleet manufacturers could cope with the need for more vehicles.

A need to assess how the Deposit Recycling Scheme (DRS) could impact waste streams was stated by 31 respondents. Glass removed through the DRS scheme achieving the same result as a collection change without the disruption it would cause was commented 8 times.

31 respondents commented that the lack of space within some households to hold the multiple containers required for a separate collection service as a major issue with the proposal.

Agreement with the proposal was stated by 28 of the respondents, some highlighting the effectiveness seen in similar schemes in Wales and Europe, 2 respondents stated they already provide this service. Whilst 3 commented that the fortnightly residual collections proposed should be an lower frequency of three weeks.

10 respondents stated their outright complete disagreement with the proposal.

Resistance and dissatisfaction towards a separate collection system with residents was mentioned 27 times. Concerns regarding the health and safety of collection service workers was also brought up by 27 respondents, often mentioning that the model used within the proposal had not taken this risk into account.

Issues with the model used were mentioned by 22 respondents. These included; outdated data having been used, disagreements in how residents' feedback had been interpreted by WRAP, inconsistency in the base assumptions/criteria used such as the assumption that

non-multi stream options require an additional vehicle to collect food waste. Whilst the timetable modelled in the proposal being unrealistic and unfeasible was mentioned by 18 respondents.

The need for an extensive and clear communication campaign was emphasised by 14 respondents. And a need for any system to be simple for residents was mentioned by 3.

Other comments made included; an onus of responsibility being placed on producers to design and clearly label the recyclability of packaging (8), collection boxes are exposed to elements with wind-blown litter a problem (7), government should consider terminating the TEEP approach (6), government should consider the reversal of section 58 and Schedule 12 of the Deregulation Act 2015 (6), recommend that glass specifically should be collected separately (5), and a need for consistency across the country (4).

## Bin colour standardisation

### Proposal 9: bin colour standardisation

Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

#### Question 29: Do you agree or disagree with this proposal?

- agree - bin colours should be standardised for all waste streams: **252 responses (47%)**
- agree in part - bin colours should be standardised for some waste streams but not all: **62 responses (12%)**
- disagree -bin colours should not be standardised for any waste streams: **84 responses (16%)**
- not sure/no opinion/not applicable: **91 responses (18%)**
- not answered: **42 responses (8%)**

47% of all responses agree - bin colours should be standardised for all waste streams, 12% agree in part and only 16% disagree.

Figure 25 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). For Local Authorities the responses are split, with 33% agreeing, 17% agreeing in part and 27% disagreeing.

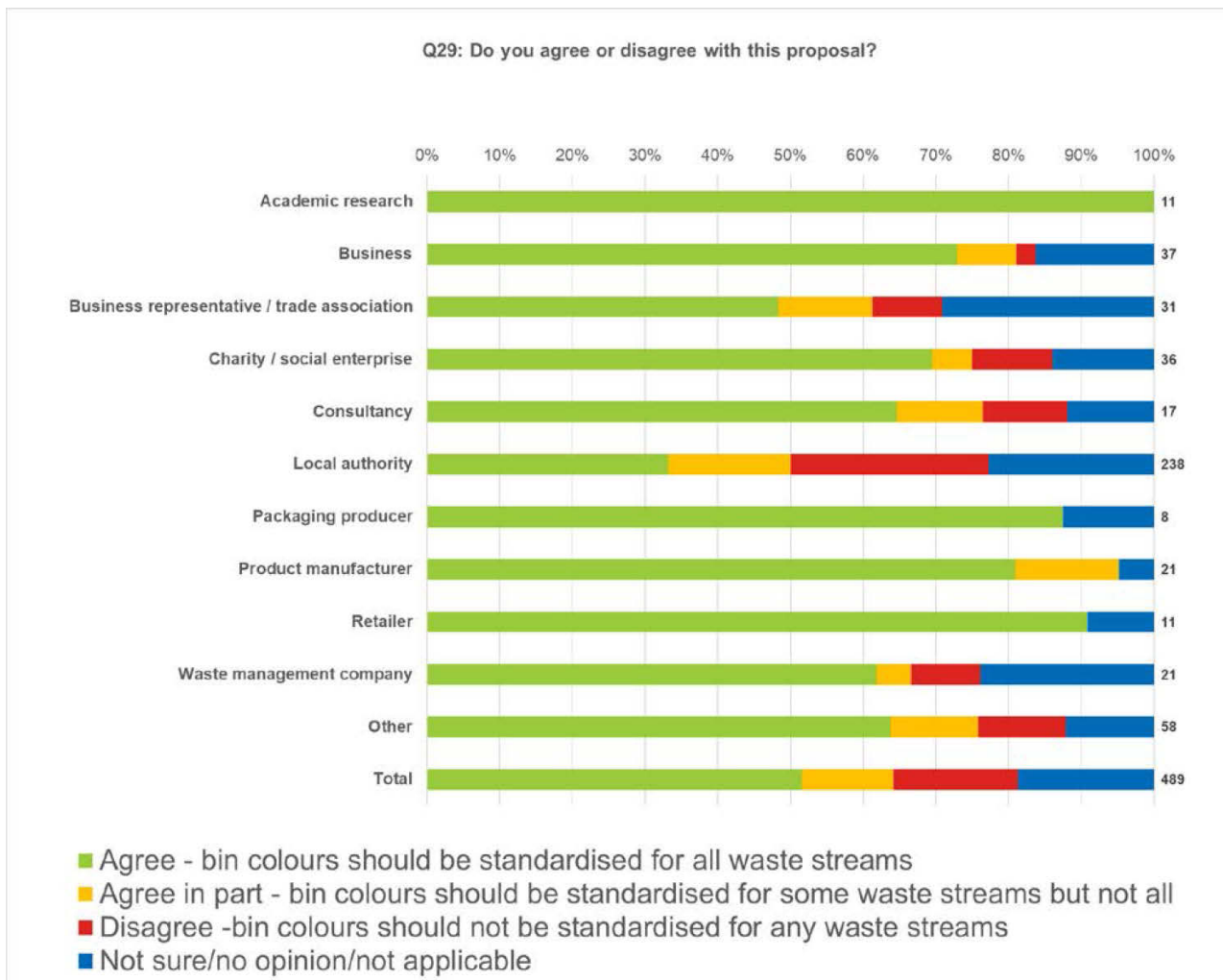


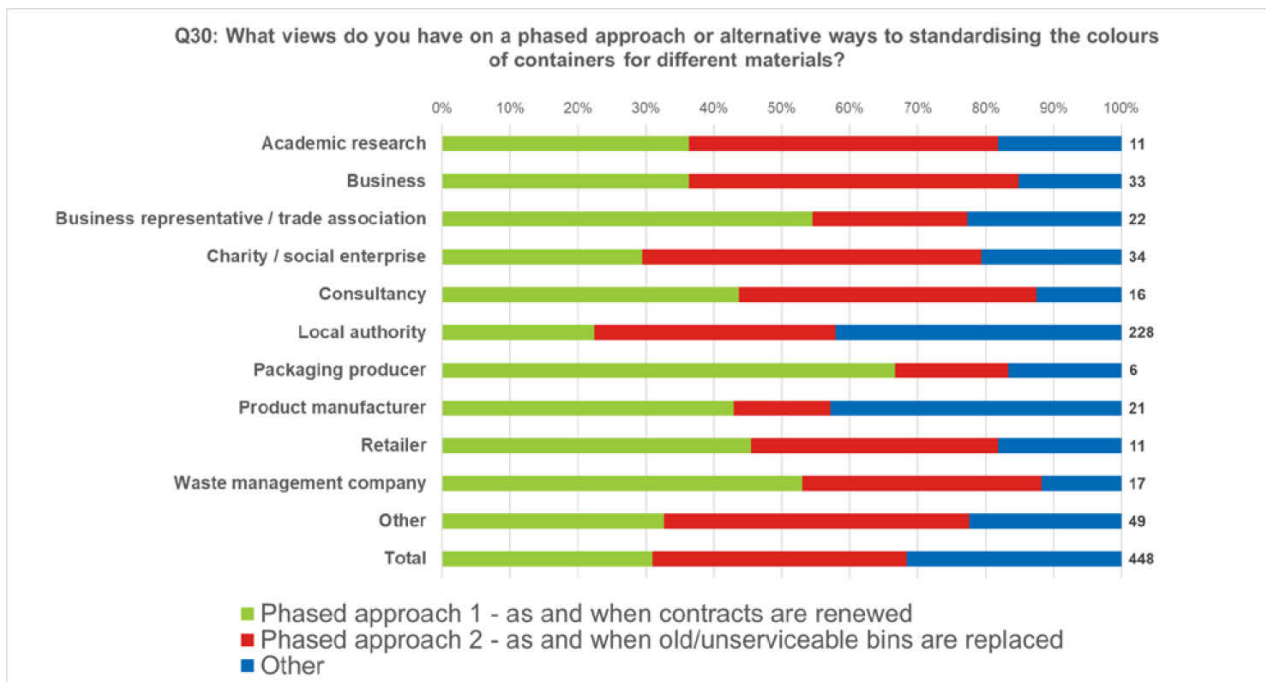
Figure 25: Q29 analysis for answered responses

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

- phased approach 1 – as and when contracts are renewed: **139 responses (26%)**
- phased approach 2 – as and when old/unserviceable bins are replaced: **167 responses (31%)**
- other: **142 responses (27%)**
- not answered: **83 responses (15%)**

26% of all respondents Agree with phased approach 1 (as and when contracts are renewed), 31% phased approach 2 (as and when old/unserviceable bins are replaced) and 12% other. Figure 26 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). For Local Authorities the responses are split, with 22% indicating approach 1, 36% approach 2 and 43 suggesting other.





**Figure 26: Q30 analysis for answered responses**

Where respondents have identified other approaches the ones with higher frequency of response were:

- concerns around the benefit of replacing existing bins (79)
- suggested use of stickers / labels (29)
- combine phase 1 & 2 (19)
- phased approach would cause confusion (10)
- numbering system (9)
- change lid colours (8)
- should be within set timeframe (8)
- alphanumeric/symbols (3)
- phased approach should be done by area (2)
- spray bins (1)
- braille (1)
- based on local circumstances (1)

### **Question 31: Do you have any other comments about Proposal 9?**

290 respondents provided 704 comments which were categorised into 47 substantive suggestions. 74% of these comments (520) were provided by local authorities.

56 (8%) respondents agreed with the standardisation in principle; however, 76 (10.5%) respondents emphasised a preference for a transitional introduction or phased approach to the introduction of standardised waste container colours, should the government decide to proceed with the proposal. An assortment of reasons were provided for this. Common reasons included; ensuring that existing container stock was used for its design life, to

allow the cost of implementation to be spread. Many felt that the use of stickers, labels or wrappers could be used in this transitional period. 28 respondents suggested that consistency of material type in bins was more important than the consistency of bin colour.

Following this, the next major response was that the cost of the introduction of standardised colour coding of containers did not represent value for money, 74 (11%). 16 respondents felt that government spending should focus on other more priority issues.

58 (8%) comments highlighted a concern regarding the faith of the existing stock of containers, should the proposal be adopted; 15 commented that they were uncertain of the benefits of the proposal and 7 stated there was limited or no evidence to support the benefits of the proposal. 21 responses thought that a detailed cost benefit or life cycle assessment was needed before a decision was made by the government. 5 comments mentioned that there should be a mandatory requirement to recycle existing containers.

A need for central government funding to support local authorities in the adoption and roll out of Proposal 9 was highlighted by 18% of respondents (53), 3 highlighted that there may be a benefit in establishing a national framework for the procurement of new containers.

54 respondents highlighted that other methods of identification of containers could be significantly cheaper as they would negate the need to replace the current container stock. 35 comments suggested that only the lids of containers should be colour coded. Others felt that alphanumeric or iconography would be more or just as effective or labels and stickers could be used in the long term too. 32 respondents recommended that whatever form of standardisation waste applied, it was important that labelling was aligned with mandatory labelling of packaging and products.

The need for an extensive and clear communication campaign was emphasised by 30 respondents. 28 commented that the introduction would be confusing for waste generators and collection crews and could lead to higher levels of contamination or lower recycling level. Only 7 respondents felt that the proposal would reduce confusion.

Other comments made included; consideration on the ability of the supply chain to manufacture the quantity of containers should be evaluated (23), the practicalities of the implementation of the transition (21), any standardisation should be rolled out across business, public areas and residences etc. (8).

# Service standards

## Proposal 10: statutory guidance on minimum service standards

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. We will consult separately on what should be included in the statutory guidance.

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

- agree - government should publish statutory guidance: **373 responses (70%)**
- disagree - government should not publish statutory guidance: **81 responses (15%)**
- not sure, don't have an opinion, not applicable: **67 responses (13%)**
- not answered: **10 responses (2%)**

Figure 27 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). The majority of respondents were in agreement with the proposal to publish statutory guidance. Although 54% of Local Authorities were in agreement, 30% disagreed.

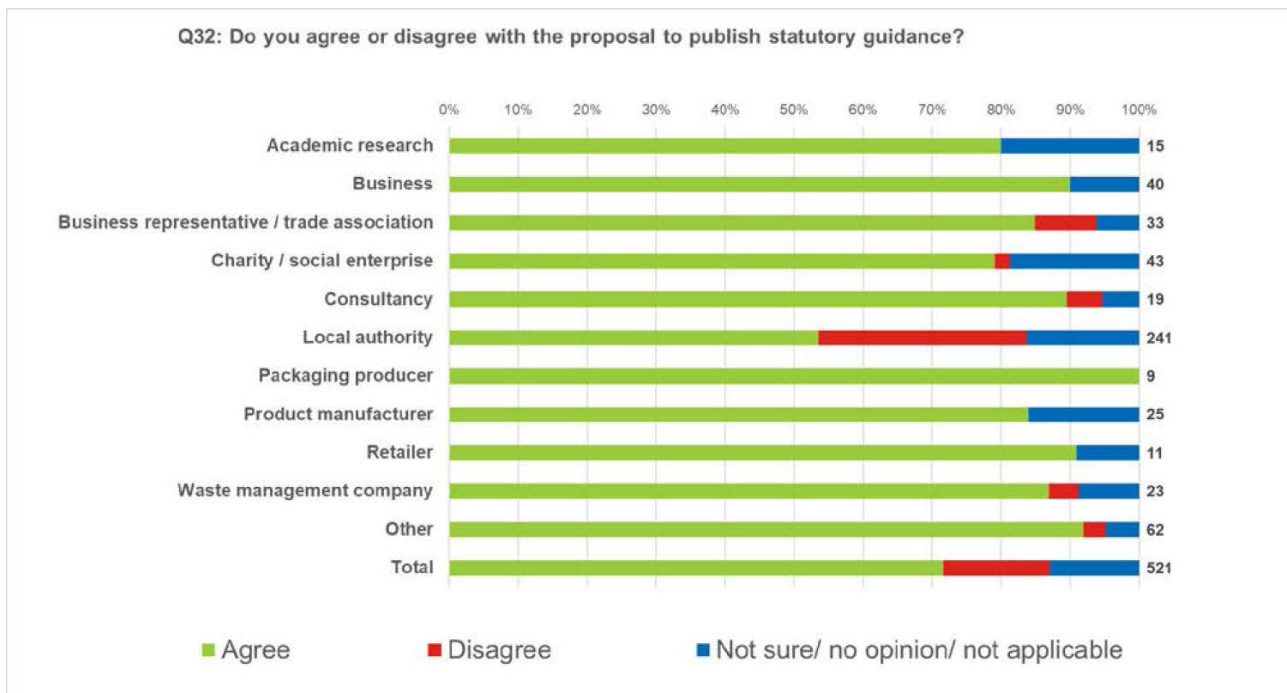
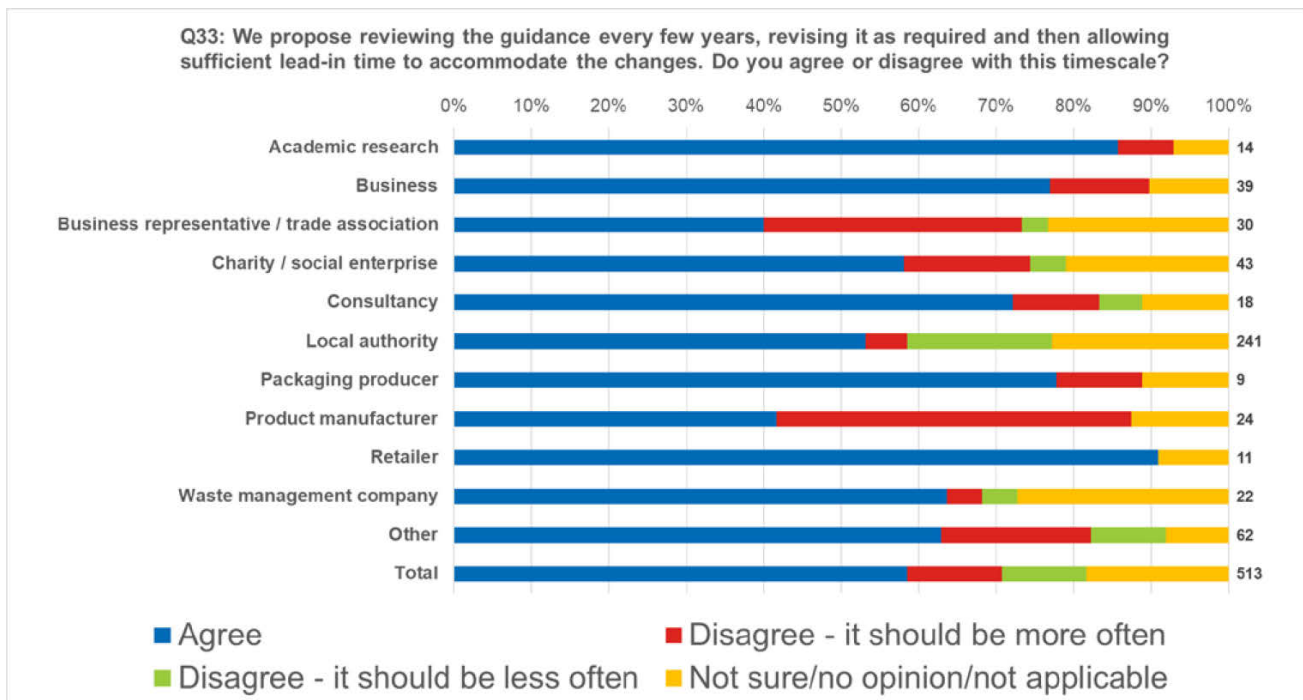


Figure 27: Q32 analysis for answered responses

**Question 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: **300 responses (56%)**
- disagree - it should be more often: **63 responses (12%)**
- disagree – it should be less often: **56 responses (11%)**
- not sure, don't have an opinion, not applicable: 94 responses (18%)
- not answered: **18 responses (3%)**

Figure 28 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). The majority of organisation types agree with approach. The next preferred option is reviews more often than that proposed. Local authorities agree and next is reviews less often than proposed.

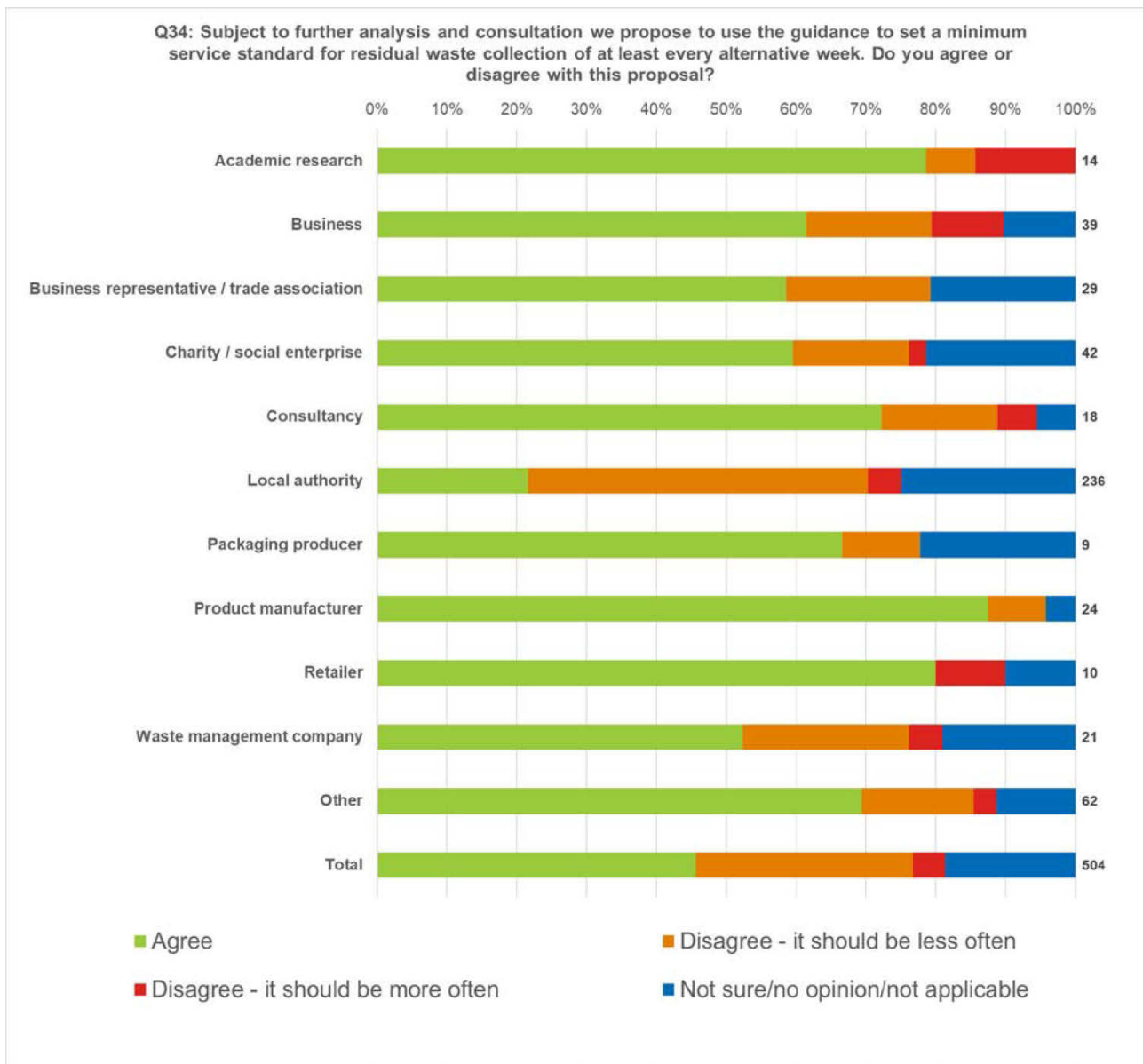


**Figure 28: Q33 analysis for answered responses**

**Question 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: **230 responses (43%)**
- disagree - it should be more often: **23 responses (4%)**
- disagree – it should be less often: **157 responses (16%)**
- not sure, don't have an opinion, not applicable: **94 responses (30%)**
- not answered: **27 responses (5%)**

Figure 29 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There was broad agreement for setting a minimum service standard for residual waste collection amongst stakeholders with the exception of Local Authorities, where 48% of respondents disagreed and stated that it should be less often.



**Figure 29: Q34 analysis for answered responses**

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

360 respondents provided 735 comments which were categorised into 41 specific suggestions or considerations. Local Authorities provided by far the most comments (542).

218 comments proposed that individual councils should have greater discretion about collection frequencies, introduce innovations and/or tailor their services to local characteristics and individual circumstances; rural areas were quoted frequently.

A further 98 comments proposed that the standards should be able to be varied according to waste type (differing standards for differing material streams) and/or property type (ie flats vs standard kerbside properties vs very rural properties).

Conversely, 6 comments suggested that alternate weekly collections for residual should be the maximum gap within the standards.

Conversely, 5 comments suggested that consistency across the country would be key to successful guidance. 11 comments noted that guidance would need to be clear and specific, with 6 comments noting that the guidance must be communicated effectively and with significant notice, including to residents.

30 comments suggested that the standards should be encompassed in legislation to ensure they are legally enforceable. 41 comments expressed concern regarding enforcement of the standards and the associated penalties, with clarity needed regarding alignment with producer responsibility.

65 comments emphasised that any changes required by the standards must be funded, with detail required regarding how they would be funded – these comments included concerns that the imposition of standards could be used to bypass the requirement to fund service changes under the New Burdens approach.

45 comments suggested that consideration of standards should incorporate a review of the maximum and minimum refuse capacity per household as a standard rather than collection frequencies. 41 comments suggested the need for confirmation of the timescales proposed for the review of standards and whether a review period would be incorporated and specified.

20 comments suggested that any review process would need to be frequent e.g. every one or two years, to account for changes caused by DRS, EPS, infrastructure developments and innovation. However, 23 comments suggested that standards must not be reviewed too often due to contract/cost implications of service change, other when there are material changes across the sector. 2 comments suggested that any future changes or reviews should be subject to further full consultation.

26 comments suggested that the standards should be based on performance, either positive or negative regardless of collection system; if the standards in place already exceed the baseline requirements then this should be acknowledged and funded accordingly.

26 comments proposed that a not-for-profit, independent body should be responsible for reviewing the guidance, with a further 4 suggesting the guidance should be reviewed by an impartial body.

Other comments noted that the service standards should be predictable/easy to remember (1), that education of and effective communications to residents would be needed (1), that compliance with the standards should be a pre-requisite for receiving funding from EPR (1), that the wording of the question is ambiguous regarding whether the guidance will be compulsory or not (2); a further 1 comment questions whether the guidance will be legally binding, with 1 comment suggesting the guidance should only be published as long as it is not legally binding.

1 comment suggested councils should be supported to procure waste technology that doesn't require source separation as long as it delivers a high recycling rate, whilst 6 comments emphasised that the quality of collected material, including biowaste, should be the key focus.

1 comment suggested that the guidance should recommend that collections should be weekly; 2 comments suggested the proposal is not beneficial and not a good use of resources; 1 further comment suggested that the current situation is adequate. 1 comment suggested that a new body with industry representatives should be set up to develop the guidance; 1 comment suggested that consideration of collection frequency should be based on the impact on waste composition once DRS is introduced.

5 comments called for IBA to be included in recycling statistics: 1 comment noted the potential effectiveness of inter-boundary working by councils: 6 comments suggested that the guidance could help alleviate changes being dictated by political cycles. 5 comments emphasised that fees from EPR should only cover the true cost of collecting material, while 2 comments noted that TEEP will need clarifying in the guidance. 3 comments suggested the guidance would be an opportunity to introduce charges for residual waste collection (PAYT), while 3 comments noted there was no mention of HRCs/HWRCs being required to be accessible and affordable.

## Communicating about recycling

### Proposal 11: support for Recycle Now and WRAP

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

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

367 respondents provided 1021 comments which were categorised into 81 specific considerations or challenges. Local Authorities provided by far the most comments (733).

The majority of respondents agreed with the proposal (247). Only 10 respondents said that they were unaware of WRAP and Recycle Now (predominantly charities or organisations in the "other" category, no Local Authorities said they were unaware of WRAP or Recycle Now). 6 respondents were concerned with effectiveness of WRAP and Recycle Now to date and 2 thought it was not value for money.

100 respondents agreed that consistent messaging nationally is important. 71 respondents (of which 65 were Local Authorities) said that WRAP's Toolkits support Local Authorities in delivering a consistent message. The importance of regular updates and evidence to support materials was highlighted (11 comments each). In addition, 59 respondents requested support with local campaigns. These respondents suggested ideas including:



on-line materials that Local Authorities could tailor, a service where a Local Authority could ask for specific materials or the ability to get materials printed on their behalf. 32 respondents commented that more targeted materials would be useful. For example, material which could be used for residents in flats or in urban centres or regarding a specific material stream.

Many respondents felt that in the event of introduction of core materials nationally, a consistent message could be promoted nationally (47 respondents of which 45 were Local Authorities). 16 respondents stated that if a DRS system is implemented this should be supported by a national campaign. 24 comments highlighted that consistent messaging would be easier if there was a consistent collection system.

A national campaign was supported by 35 respondents. Respondents suggested TV, Radio and newspaper campaigns and this was likened to national campaigns such as the seat belt or drink and drive campaigns.

Funding for communications was seen by respondents as important. 6 comments requested clarity on the source of funding. 20 comments addressed EPR funding and suggested this should be used to fund national and local campaigns (via WRAP or otherwise). 17 comments stated that WRAP and Recycle Now needed adequate resources to deliver the required communications. 30 comments related to the need for funding direct to Local Authorities for communications. The importance of face-to-face communications at a local level was highlighted (12 comments).

19 Local Authority responses referred to having better foresight of any national campaigns led by WRAP. A number specifically requested earlier sight of the Recycle Week topic so that it could be planned into local campaigns. One idea raised by a Local Authority Partnership was to have an annual communications calendar shared with all Local Authorities. 18 respondents thought there should be closer links between WRAP and Local Authorities to share information and develop materials.

The importance of on-pack labelling in delivering a consistent message was raised in 25 comments (from Local Authorities, businesses, packaging producers, manufacturers and retailers). 3 comments specifically requested OPRL systems should be used. 12 comments highlighted the importance of including manufacturers, packaging companies and retail in messaging. The importance of consistency between the materials produced by Local Authorities and iconography seen on packaging was highlighted (3 comments).

8 respondents suggested innovative communications channels should be supported including social media and digital packaging labels (e.g. linked to easily updateable apps).

26 comments flagged the need for communications to cover waste prevention and the waste hierarchy as well. Love Food Hate Waste and Love Your Clothes were mentioned.

A small number of comments (6) addressed the ease with which the Recycle Now website can be used. One comment suggested that the Recycle Now website is poorly designed because it cannot be crawled, indexed or found by search engines.

Other comments covered: areas where consistency could be improved such as bin colours relative to WRAP iconography, naming of materials; niche materials recycling, use of numbers, organically recyclable packaging, reinforcement with enforcement.

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

531 respondents provided comments which were categorised into 17 specific areas of information that would help householders and members of the public recycle better.

By far the most comments received identified that clearer information including signage/bin colours/ braille/ translations on what can be recycled (161) was the most appropriate approach.

This was followed by suggestion for the delivery of a national media campaign (e.g. TV including social media, use of celebrities/ targeted audience (102 comments). Or simply new and innovative new ideas e.g. promotion at national level (8). This was closely followed by the need for frequent and simple consistent communications (e.g.) could be considered via council leaflet, education packs) with 101 comments.

The need for information on packaging, labelling (i) colour to correspond to bins (ii) remove non-recyclable) also received a high number of supporting comments. (88)

Other ideas generated were alternatives to using literature such as using simple graphics (preferred than words)/ systems/UK map received (60) and information on what happens during and after recycling process (56) along with providing comprehensive information /updates on what, why and impacts of poor disposal has on recycling such as contamination (50)

There were also comments received on removing information as well as identifying the type of information to provide such as getting rid of the 'check locally option' on products. (44)

A number of comments forwarded the need for positive messages in any information provision such as presenting the benefits (env, possible discounts on recycled material, incentive schemes) 41 comments. This was supported by over 40 comments on providing direct info and education particularly from LA (with funding) on the benefits of recycling.

Alternative to information was the need for enforcement tools for LAs (31 comments) was raised as a way of helping householders and members of the public recycle better. In addition, dialogue not more information (2) was forwarded.

The need for clearer info on how to present materials i.e. clean (23) and the importance of communicating the end of life/impacts for contaminated recycling (21) was raised.

How information was already raised such as providing more information on Recycle Now followed by annual statistics reports 15

There were some comments (12) which highlighted that information presently being provided was being ignored.

Innovative new ideas e.g. promotion at national level (8)

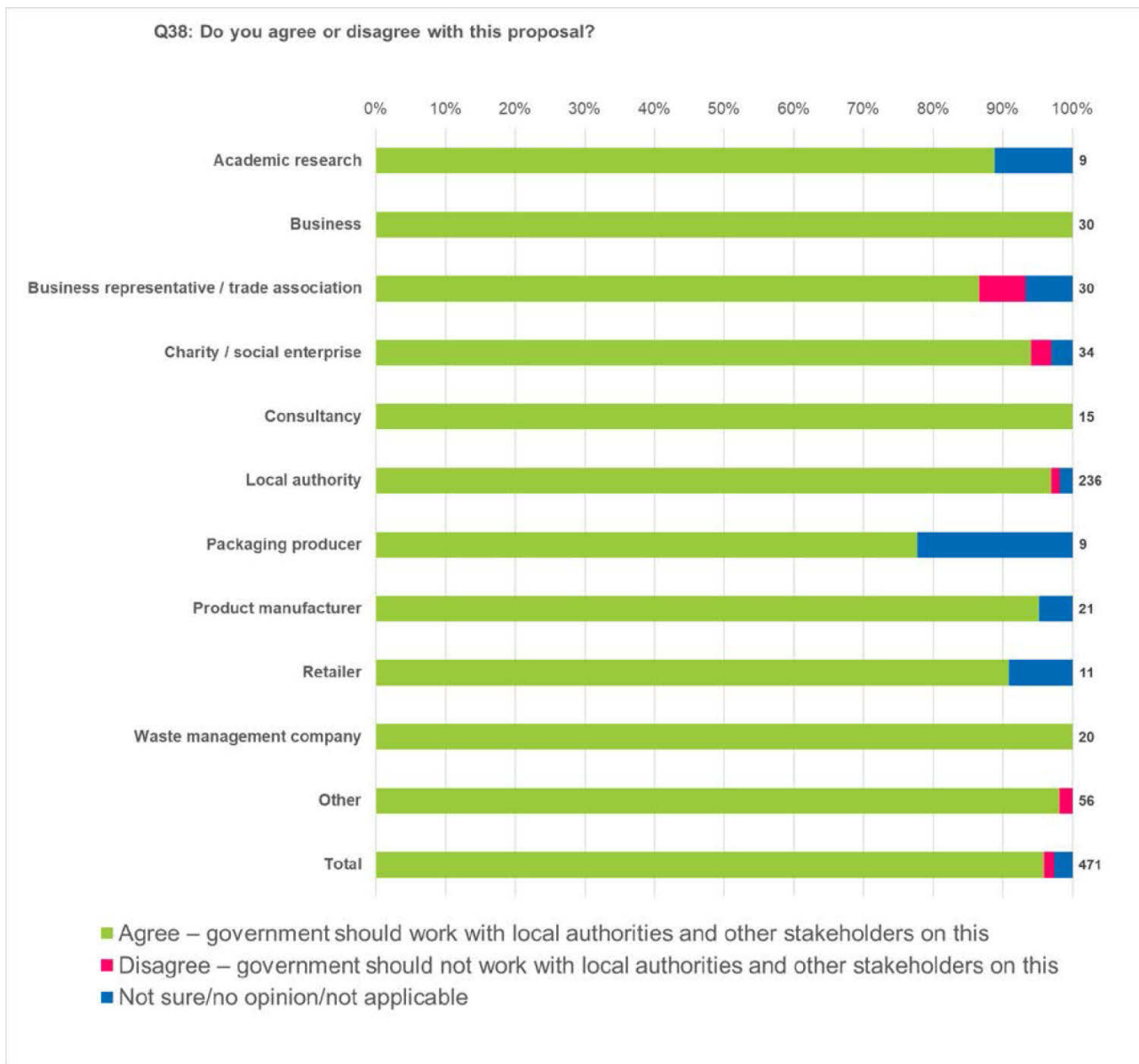
## Proposal 12: transparency on end destinations of household recycling

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

### Question 38: Do you agree or disagree with this proposal?

- agree – government should work with local authorities and other stakeholders on this: **452 responses (85%)**
- disagree – government should not work with local authorities and other stakeholders on this: **7 responses (1%)**
- not sure, don't have an opinion, not applicable: **12 responses (2%)**
- not answered: **60 responses (13%)**

There is strong support for this proposal both in total and across all organisation types, as shown by Figure 30.



**Figure 30: Q38 analysis for answered responses**

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

300 respondents provided 370 comments which were categorised into 17 specific suggestions or considerations. Local Authorities provided by far the most comments (242).

The majority of comments (81) strongly agreed with the proposal. 74 comments noted that there is currently too much misinformation regarding this issue. 59 comments suggested that implementing a national system will help with transparency and communication.

27 comments suggested that the proposal will help encourage household separation of waste, with a further 14 comments suggesting it will assist / encourage people to recycle.

However, 26 comments suggested that the information is already available on wastedataflow and they believe this is a sufficient and appropriate mechanism. Conversely, 6 comments suggested that wastedataflow is not an appropriate mechanism. 1 comment suggested that building on the existing data would be appropriate.

15 comments suggested that reporting requirements should be reasonable and easy to undertake. 24 comments noted the need to consider commercially confidentiality. 1 comment suggested that the process needs to be monitored and audited.

14 comments suggested that there needs to be a firmer commitment to the proposal. 9 comments felt that transparency won't be possible until there is sufficient processing capacity in the UK, with a further 7 comments focussing on the need to make it viable to process recycle in the UK.

2 comments emphasised the need to work with industry as well to access information.

10 comments noted the need for promotion of a Circular Economy approach and the need to treat waste as a resource.

## End markets

### Proposal 13: stable markets for waste commodities

Government recognises that for the proposed waste collection and recycling measures to work effectively, stable markets for waste commodities need to be developed.

Government's view is that consistent collections by local authorities, with associated implementation of minimum service standards, and improved material quality, will give investors greater confidence that there will be a steady, sustained supply of quality recyclable materials to enable them to deliver required waste sorting and recycling infrastructure in the UK.

#### **Question 40: Please use this space to briefly explain any comments you have on this proposal.**

531 comments (including 99 group responses) were categorised into 15 substantive suggestions. The vast majority of these (241) were from local authorities.

Two particular issues were raised: 159 respondents felt it was important to ensure that government invests in businesses and infrastructure to have appropriate processing and infrastructure in place alongside the growth of stable markets. The need for sufficient capacity, and infrastructure to facilitate waste collection and recycling measures was seen as an integral element to enable the operational success of this proposal. In addition, 68 respondents stated the need to be more of a government incentive provided for pioneering technologies and businesses. Examples of specific incentives which were raised by

potential investors in the sector will be looking for additional support mechanisms such as reduced VAT rates, national insurance holidays, taxes on virgin materials etc to further support the business case for investment.

However, 109 responses agreed and welcomed the improvement which were outlined in the proposal, improved material quality, will give investors greater confidence that there will be a steady, sustained supply of quality recyclable materials to enable them to deliver required waste sorting and recycling infrastructure in the UK.

71 respondents emphasised that the current market is volatile and beholden to end users. A further 29 outlined a greater reassurance in households is needed so, that recycled material is being recycled appropriately. In order to achieve stable local markets ideally, they need to be in place before councils change the services. If residents are to have confidence that the materials they segregate are being appropriately recycled, end markets must be available. If no market is available for the recyclate, 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.

A further 33 respondents suggested the need for more prescriptive to establish stable markets e.g. using taxation to penalise companies / virgin materials. A common instrument which was predicted as acting as an effective tool is the proposed tax on plastic packaging has been expressed as more likely to have an impact on end market and sorting availability.

29 respondents agreed on the need to reduce reliance of exporting waste overseas which is not surprising when 28 respondents highlighted that cost is key driver as it was stated in some respondents that waste infrastructure requires significant financial investment and time as result there is still a strong reliance on exporting waste over-seas.

The need for more legislation was represented by 28 respondents, key messages which were highlighted, in order for the U.K to become self -sufficient accompanying policies need to be put in place to generate a stable market.

Alongside more legislation needed 28 respondents expressed that contamination was the main issue and education campaigns are vital to communicate to end users.

Harmonising all councils to collect under the same collection schemes as well simplifying the process was suggested by 23 respondents. A further 21 respondents concluded that there is need to regulate closely in order to provide higher recycling rates at a higher quality.

Other responses concluded that in order to stabilise markets and encourage investors there needs to be a collaboration with industry to provide a platform where government and industry can collectively work together. 5 respondents suggested that there is a need for research to find users for the recyclate and use these materials within the government services.

Lastly 2 respondents outlined that the packaging and recycling industry have shared this common thinking for years.

## Non-binding performance indicators

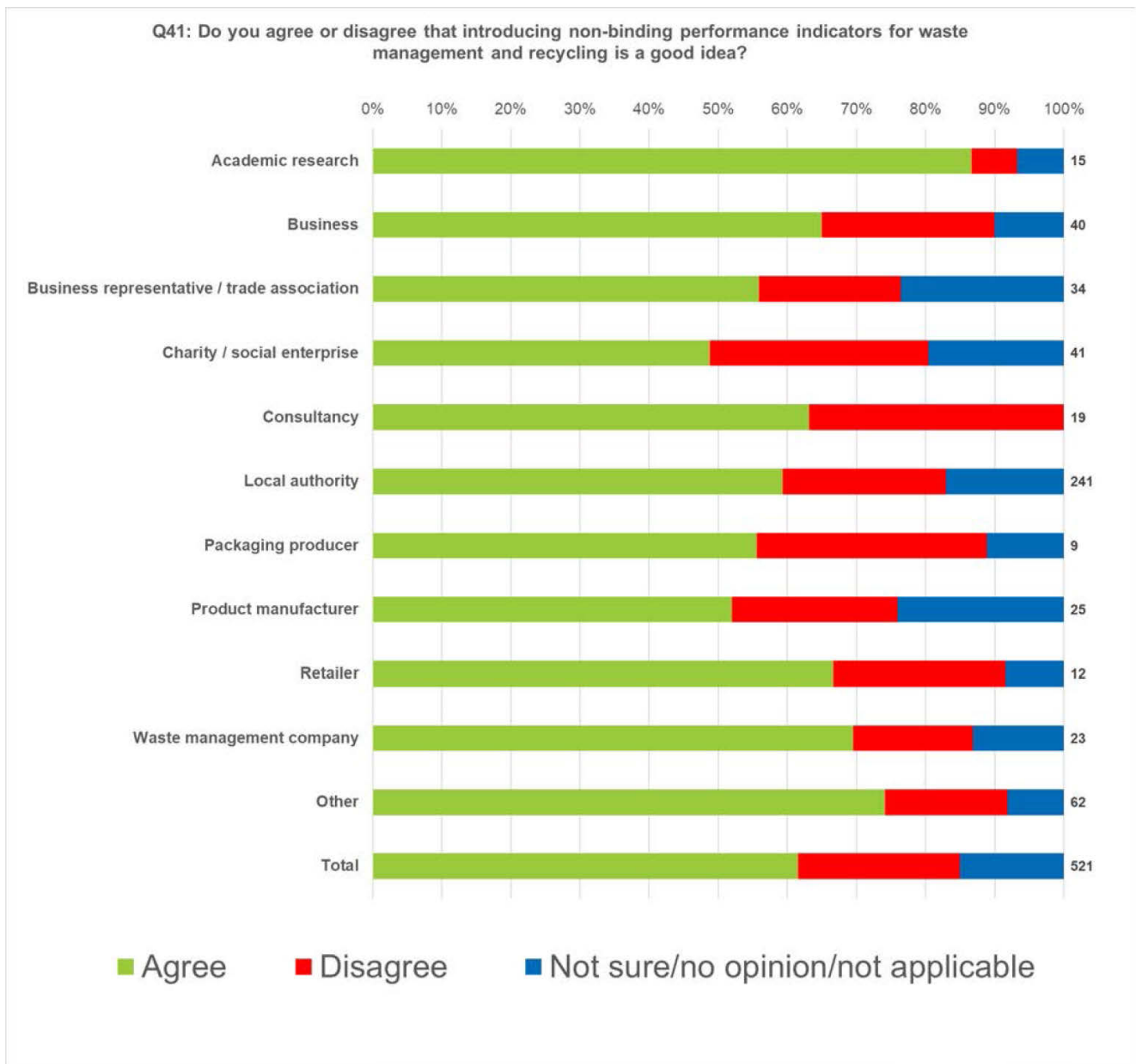
### Proposal 14: development of non-binding performance indicators for local authorities

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to deliver higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

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

- agree: **321 responses (60%)**
- disagree: **122 responses (23%)**
- not sure, don't have an opinion, not applicable: **78 responses (15%)**
- not answered: **10 responses (2%)**

In total and across each organisation type there is a general agreement towards the proposal. Figure 31 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered).



**Figure 31: Q41 analysis for answered responses**

Those that disagreed noted the following:

- why not make them binding? (83)
- targets might be used against Local Authorities (becomes binding in public eye) (13)
- local variation may make analysis and comparison difficult (13)
- need reassurance on what these performance indicators would be (10)
- proposed indicator information can already be easily compiled (9)
- waste of time and money (just more bureaucracy) (3)
- should fine for non-compliance (2)
- effectively only guidance (1)
- not needed with plastic and other material tax proposed (1)

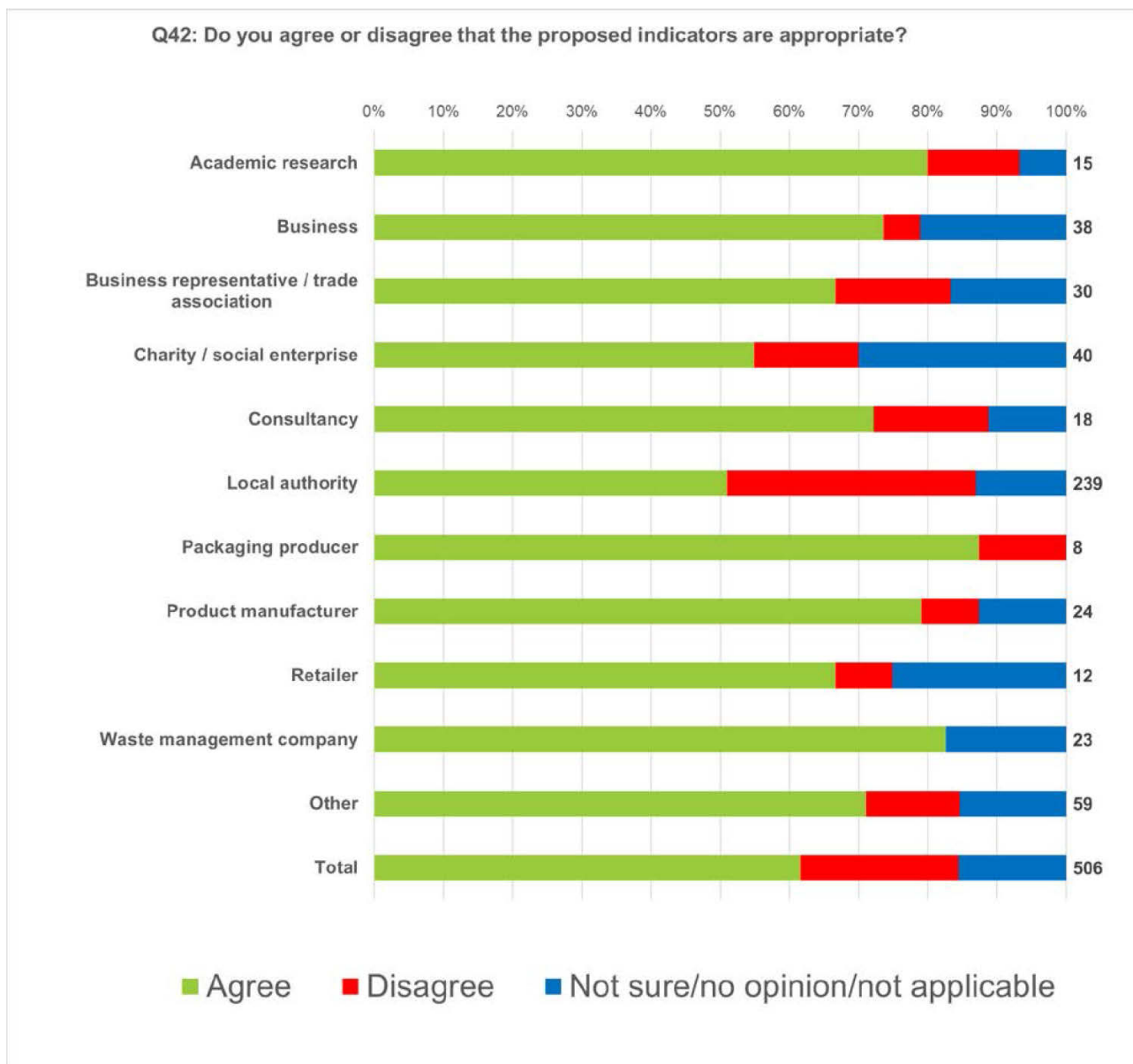


- needs to have additional funding (1)

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

- agree: **312 responses (59%)**
- disagree: **116 responses (22%)**
- not sure, no opinion, not applicable: **78 responses (15%)**
- not answered: **25 responses (5%)**

In total and across each organisation type there is a general agreement with the proposed indicators. Figure 32 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Local Authorities had the lowest level of agreement at 51%, with 36% disagreeing.



### Figure 32: Q42 analysis for answered responses

Those that disagreed noted the following:

- should not measure garden waste given the factors that influence the amount collected and environmental concerns (18)
- variation between authorities should be accounted for i.e. rurality, level of deprivation, etc (18)
- there should be an incentive to reduce waste (15)
- there should be less focus on weight/yield (12)
- results should take into consideration houses served or kg/head (12)
- waste generation should be considered (10)
- more indicators (re-use, total waste per household, specific materials) (9)
- too much emphasis on recycling and should consider other aspect of waste hierarchy (9)
- carbon based (6)
- not measure food waste as ideally want to reduce, also will be difficult to measure if mixed with garden (5)
- disagree with principle of the indicators (3)
- indicators for packaging waste stream (2)
- not based on % of diverted waste (2)
- additional indicators will be time consuming to monitor/report (2)
- measure for levels of contamination (1)
- designed to improve environment (1)
- need to know how much ends up as litter (1)
- fly tipping information is already published (1)
- not just for financial gain for achieving performance (1)
- should be developed locally (1)
- based on % recyclable collected and organic waste diverted (1)
- sometimes there is less control over how materials are handled i.e. bulky materials can change between recycling and recovery (1)
- % of school children actively engaged (1)

### Question 43: Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

288 respondents provided a wide range of responses to this question (155 substantive suggestions), providing numerous examples of indicators that could be used and often cross-referencing responses to question 46 of the consultation. The majority of respondents were from local authorities and many (often members of the same Partnership group of authorities) used a similar 'template' response with additional comments reflective of their own circumstances.

## **Data collation, reporting and governance**

Many respondents highlighted the existing (and previous) frameworks in place for reporting data and assessing performance and highlighted that these should continue to be used although with a refresh so that they are fit for purpose. Waste Data Flow in particular was highlighted by 47 respondents as a platform which could be reviewed and amended as it is unwieldy and has evolved beyond its original purpose. It was suggested by a number of respondents (11) that some previously used national binding indicators (NI) could be re-instated. It was felt by many that any new system introduced should not be a burden (27) and that there may need to be support for the cost of collecting and reporting on additional data (39).

The need for alignment across flows of data and performance systems related to packaging was a strong theme with 35 respondents, with 17 stating that metrics should specifically consider EPR. It was also suggested (19) that a single body with responsibility for EPR could be appointed to oversee all evidence gathering and data collation, including objectives, definitions and targets of (for example) Waste Data Flow, Fly Capture, the National Packaging Waste Database, and any new systems arising out of implementing packaging EPR proposals, and a potential GB or UK deposit return scheme. Some concerns were raised around ownership of material and focus on recycling. The introduction of EPR and DRS systems, focus on circular economy, waste prevention etc. may all mean that the amount of material available and in local authority ownership may change in the future, which could mean that recycling rates (if continued as a metric) may reduce. A suite or basket of metrics may be a suitable approach to balancing changing material flows.

Support for a residual waste indicator was put forward by 12 respondents with a number of others suggesting similar metrics to achieve waste minimisation (17) and a waste generation figure of kg/hh/yr or kg/hh/head (44). Aligned with this material quality was raised by 12 respondents with some highlighting contamination levels in biowaste as a specific concern.

There were contrasting views on whether indicators should be binding (11) or non-binding (14) and also that the proposal should be going further (25). A number of respondents (25) flagged that indicators should not be a mechanism for withholding funding if (for example), required performance standards are not achieved (12).

Requests for further information and clarity were raised by some respondents accompanied by offers to assist with the development of alternative indicators.

### **Alternative Indicators**

A large number of alternative indicators were proposed many with the caveat that additional research should be conducted. The most popular indicators nominated by respondents included nearest neighbour comparisons / benchmarking (9) and specific local targets to suit sociodemographic differences (9). Garden waste was also raised with

9 respondents stating that there should be no free green waste service and 9 stating no green waste targets

**Others** (all with less than 5 comments)

- cost of waste collection / treatment / disposal
- cost per tonne of material collected
- number of complaints received (although some were opposed to this target as it was felt to be subjective)
- missed bins
- end destinations (in accordance with the End Destination of Recycling Charter)
- tonnage of waste reused
- residual waste generation
- school children actively engaged in resource efficiency

## Alternatives to weight-based metrics

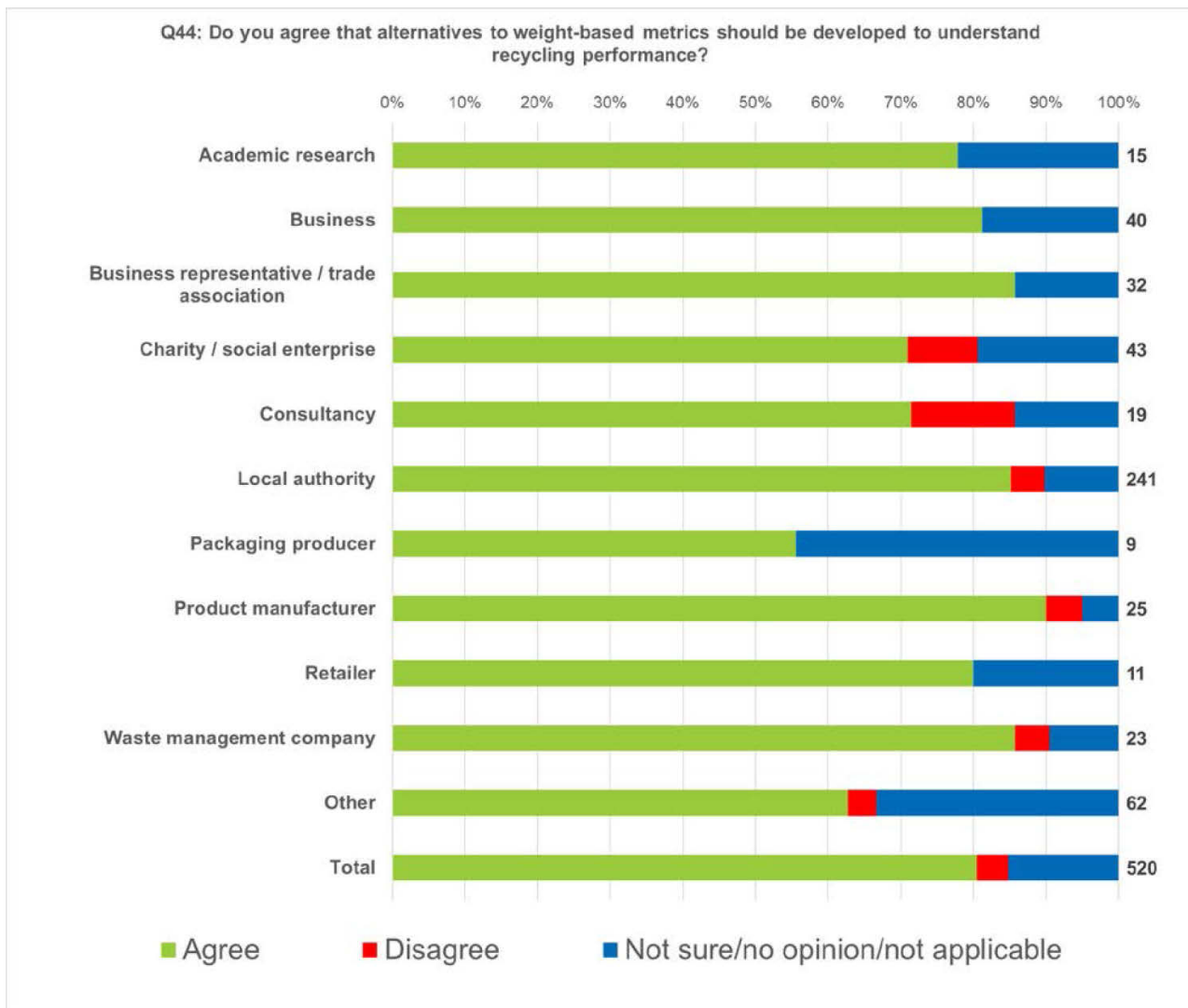
### Proposal 15: alternatives to weight-based metrics

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

**Question 44: Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?**

- agree: **371 responses (70%)**
- disagree: **20 responses (4%)**
- not sure, no opinion, not applicable: **70 responses (13%)**
- not answered: **70 responses (13%)**

In total and across each organisation type there is relatively high agreement that alternatives to weight-based metrics should be developed. Figure 33 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered).



**Figure 33: Q44 analysis for answered responses**

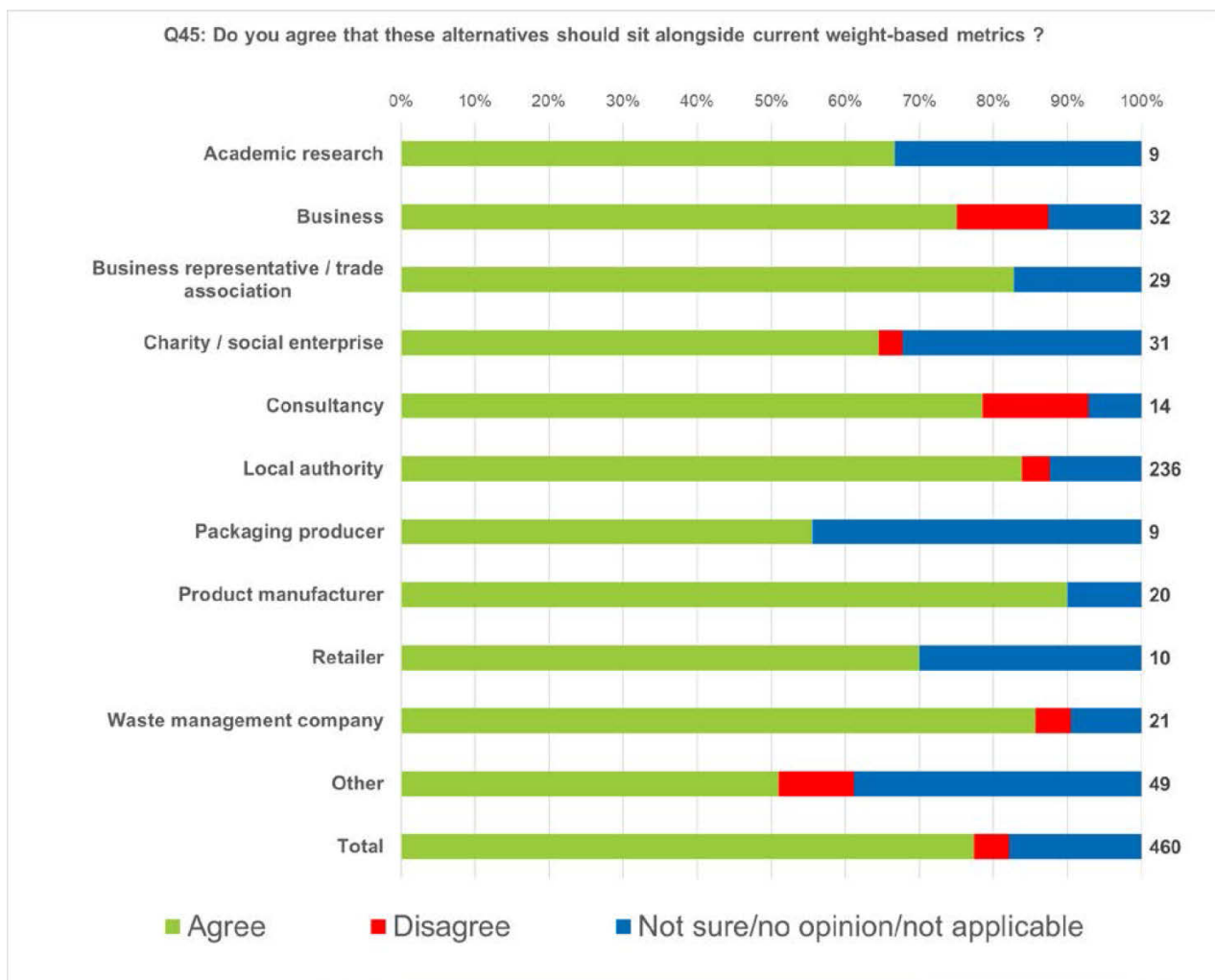
Those that disagreed noted the following:

- weight based most accurate/easy and should be retained (9)
- alternatives would add further expense (2)
- volume of material used could be a metric (2)
- proportional split expectations based on type of material and a standardised weight vs volume ratio (1)
- not seen metric to comment on (1)
- cost of collection (1)
- weight to carbon (1)
- Life Cycle Analysis methods should be used to assess the Environmental Impact Tax and the databases (Gabi, Ecoinvent and BRE's Ecopoints), are all based on weight (1)
- targets are for the public and thus should be kept simple (1)

## Question 45: Do you agree that these alternatives should sit alongside current weight-based metrics

- agree: **356 responses (67%)**
- disagree: **22 responses (4%)**
- not sure, no opinion, not applicable: **82 responses (15%)**
- not answered: **71 responses (14%)**

In total and across each organisation type there is relatively high agreement that these alternative metrics should sit alongside current weight-based metrics. Figure 34 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered).



**Figure 34: Q45 analysis for answered responses**

Those that disagreed noted the following:

- this would add further expense to the process (2)
- weight is the easiest and conforms with the rest of the world (2)

- sit alongside and then potentially evolve into more effective metrics as the system develops (1)
- it becomes too complex. It's unclear what we hope to achieve by adding further performance measures (1)
- the whole thing needs reviewing. It should not be as well, but an instead (1)
- if alternatives are shown to be more appropriate and relevant they should, over time, be adopted in favour of weight-based metrics. Pursuing tonnage purely for the sake of weight and purely because it is easy to measure may not lead to appropriate environmental outcomes (1)
- it would prove helpful if a standard converter for weight-based tonnages to carbon were produced to enable authorities to demonstrate the carbon savings being made (1)
- the alternatives should replace not sit alongside the current weight-based metric (1)
- needs to be new measures reflecting the short- and long-term damage certain materials cause the environment thus influencing their priorities within the waste strategy (1)
- we do not believe that alternative metrics should sit alongside the current weight-based metrics. This would be duplicating work and has no added benefit (1)
- keep to weight-based and only one set or the public will become confused and not give recycling sufficient focus (1)
- surely the point of a non-weight-based target is to encourage different outcomes – e.g. better environmental, social or economic. They could directly conflict. If we conclude the new non-weight-based target is better, we should replace the old weight-based one with it. However, the weight and non-weight-based indicators should be published alongside each other for a transitional period to allow comparisons to be made over time (1)

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

531 comments were categorised into 102 substantive suggestions. The vast majority of these (241) were from local authorities. 355 respondents agreed that there was a need to introduce alternative metrics to weight based targets. However, 37 respondents, mainly local authorities, emphasised the importance of aligning any new metrics with those currently used.

One metric was particularly highlighted: 182 respondents felt it was important to consider carbon related or greenhouse emissions metrics either as an alternative to, or in conjunction with, weight-based targets. Respondents suggested that carbon emissions be considered with respect to the types of waste material being collected. It was also suggested that the carbon savings (12), and impact (40) observed due to the recycling and reuse of waste materials be considered as well as any carbon savings made due to the use of new technology

73 respondents highlighted the wider environmental footprint (e.g. eutrophication, abiotic depletion) as important to be considered an alternative metric. A further 15 respondents suggested that the environmental impact of transportation used for waste and recycling collection should be considered as a suitable supporting metric.

33 respondents suggested that alternative metrics should encourage waste prevention, as well as recycling. Several respondents highlighted that the use of only weight-based metrics did not encourage waste prevention, as this metric often resulted in local authorities collecting heavier materials which would enable the achievement of targets rather than targeting materials which have the greatest environmental impact.

Social metrics such as the availability of local authority bulky waste collection services, reduced littering in local communities, number of jobs created by the industry, civic participation in recycling, the breakdown of the types of households engaging in reuse and recycling and number of shipments of UK waste to other countries were highlighted by respondents. 21 respondents suggested that financial savings from remanufacturing or avoiding landfill should be considered as a metric, while 16 emphasised the importance of measuring the amount of value/revenue generated through reuse and recycling of waste resources.

The need to develop metrics which would be practical and easy to measure was recommended by 19 respondents. 46 local authorities suggested that Waste Data Flow be updated to enable it to be used to calculate metrics or share information/guidance on calculating these metrics. In line with this, 26 respondents highlighted that the introduction of new metrics should not result in an increased reporting burden from local authorities. Finally, a need for further research and consultation was suggested by 16 respondents.

## Joint working

### Proposal 16: joint working

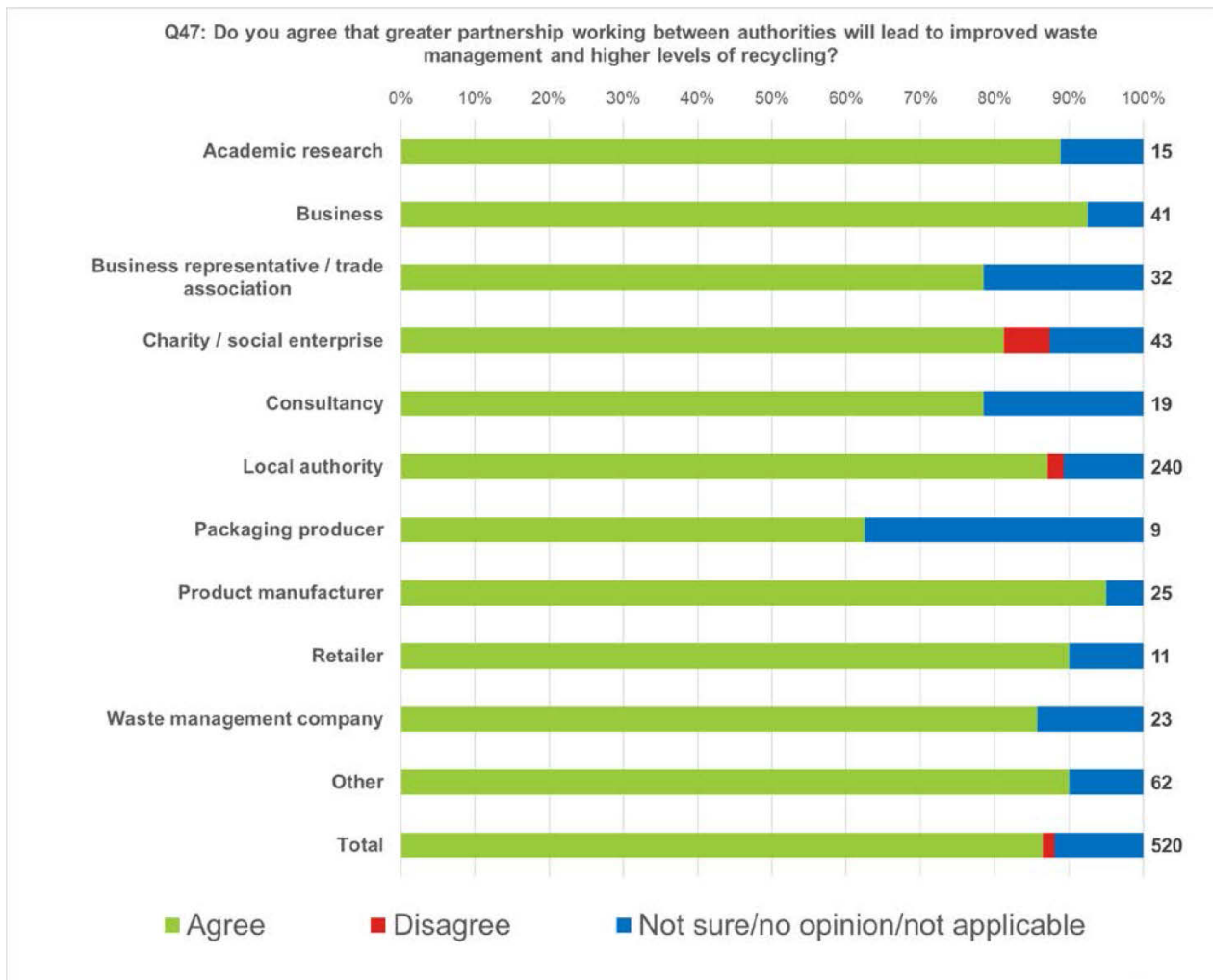
We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

**Question 47: Do you agree that greater partnership working between authorities will lead to improved waste management and higher levels of recycling?**

- agree: **392 responses (74%)**
- disagree: **7 responses (1%)**
- not sure, no opinion, not applicable: **54 responses (10%)**
- not answered: **78 responses (15%)**



There is strong agreement and minimal disagreement that greater partnership working between authorities will lead to improved waste management and higher levels of recycling. Figure 35 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There was broad agreement across all stakeholders.



**Figure 35: Q47 analysis for answered responses**

Those that disagreed noted the following:

- greater partnership working usually means a reduction in local resources where job roles are merged and shared. I'm not sure how this would improve waste management delivery (1)
- in a partnering situation, good practice can be shared, and systems rolled out to help improve performance of the least performing authority. There are minimum benefits for authorities who are performing well, have well-structured and efficient rounds, have worked on improving cost through procurement and have efficient structures (1)

- better savings and management can be achieved by collecting and processing locally, even down to town and parish level, particularly if the benefits can be seen and felt locally (1)
- reduced residual collection frequency and resources to engage residents on the doorstep to better sort waste are the two interventions that will do most to increase levels of recycling (1)
- partnership working has its place with respect to the joint procurement of disposal facilities/contracts etc. but my experience is that the generation of economies of scale in waste collection make the service more difficult to manage, more bureaucratic and less responsive to local needs. There is a tendency to focus on reducing costs rather than providing quality services (1)

### **Question 48: What are the key barriers to greater partnership working?**

531 respondents provided comments which were categorised into 26 specific barriers to greater partnership working.

The overwhelming problem identified as a barrier for authorities to collaborate was the various political/cultural/ideological differences (190). This was followed by three comparable issues raised by respondents which were considered as major obstructions. These were contractual implications e.g. lack of alignment on end dates or in house vs contract (146), the cost and or funding required to deliver collaboration, compounded by the different financial position of authorities (140) and the inequalities or difficulties in arrangements/decision making powers including lack of incentives e.g. in two-tier authorities or role of a partnership board (138).

There were then a number of obstacles raised by respondents which attracted a similar amount of comments. These were the differing priorities/vision/attitude to risk or lack of unity/commitment (79), fear of loss of control/need for sovereignty (77) and the difficulty of overcoming operational issues such as different collection/disposal methods (66).

In addition, a number of comments felt that the complexity of the process, including legislative/strategic barriers (53) were a difficulty, whilst the topography, demographics etc. of an Authority (47) was also raised as an issue including existing infrastructure e.g. proximity (28). Similarly, the different approaches to communications and enforcement (18) was a concern. The lack of consistency in service delivery (3) could be grouped within these concerns.

The lack of resources or experience (29 comments) within Authorities was also seen as a problem.

There were then a range of obstacles highlighted in single figure comments such as:

- the 'silo' mentality of Authorities (9)
- lack of central government guidance (9)
- competition from both private and public sector (7)

- difficult to prove benefits (7)
- lack of forum/network to promote ideas or lack of communication generally (6)
- lack of incentive (5)
- different performance (4)
- lack of trust/transparency (3)
- concern over job losses (2)
- need to modernise and adapt to modern transcendence of old boundaries (2)
- getting agreement on costing provisions (1)
- inability to change (1)
- not involving the community in the process (1)

### **Question 49: How might government help overcome these barriers?**

323 respondents provided 539 comments which were categorised into 30 specific suggestions or considerations. Local Authorities provided by far the most comments (371).

71 comments proposed that either incentives or unconditional financial support should be provided for local authorities to develop partnership working initiatives, including the pooling of resources and development of joint procurement methodologies. 38 comments suggested that existing partnerships should be assessed, with the visibility of these partnerships enhanced and opportunities to share best practice and highlight problem areas developed, either through consultancy support or government co-ordination.

37 comments suggested the development of centralised standards and practices for collaboration and partnership, including a space for debating and sharing knowledge, experience and expertise. 33 comments suggested that government fund and facilitate a knowledge area for collaboration guidance, including procurement support, a database of existing disposal and reprocessing contracts and a database of available reprocessors and disposal options, including location and capacity. 8 comments suggested the government fund regional bulking centres for the sorting and on-transport of waste materials.

25 comments suggested that government create and fund a mediation and best practice board, including representatives from local authority networks, producers and reprocessors and national government. 3 comments suggested the government should fund training in the aims of the implementation of the policy and incentivise participation.

38 comments suggested that existing partnership should be given more visibility and should be utilised to provide an opportunity to share best practice and identify constraints and issues.

33 comments suggested that the government introduce statutory legislation including a Duty to Co-operate, which should include a requirement for councils to publish relevant performance data. 20 comments suggested the government should benchmark each Council's performance and provide support to poor performers. Benchmarking should allow for socio-demographic influences.

9 comments suggested it should not be government's role to centralise, rather that partnering should happen organically. However, respondents felt a government template for acceptable partnerships would be useful, including commissioning studies of groups of authorities to assess partnership opportunities.

The issue of two-tier arrangements generated a range of opinions: 38 comments suggested that legislation should be revised to enable WDAs to also become County-wide WCAs, effectively becoming Joint Waste Authorities where appropriate. 45 comments suggested government-funded incentivisation to improve co-ordination between WCAs and WDAs. Conversely, 4 comments suggested that all WCAs should become WDAs, effectively Unitary waste authorities, but be permitted to work collaboratively with other authorities. 46 comments suggested enabling WCAs to work across current WDA borders to promote efficiency.

58 comments proposed a review and subsequent revision of the Disposal Credit scheme to better ensure sharing of costs and savings between two-tier authorities, with a whole system costs suggested to ensure savings are utilised to invest in services.

5 comments suggested the government provide funding to challenge the length of contracts being entered into (up to 25 years) and to assist councils in challenging existing contractual constraints. 8 comments suggested Sum of Arrange recognised centres for sorting/distributing of waste materials.

14 comments request that the government agree the core materials to be collected and provide clarity on the new burden funding; 13 comments suggest that harmonisation of collection services and associated data reporting will suffice to improve performance. 14 comments note that producers should also have a duty to co-operate, mainly through the EPR system.

Other comments were that Councils should focus on reuse and recycling only, leaving end-of-life disposal and reprocessing to others (1), collaboration should be prioritised over competition (1), packaging legislation should be designed to facilitate homogenous collection schemes (1), funding should be provided to assist fleet standardisation (1), the LGA should be the vehicle to promote, support and improve collaborative working (1), outsourcing of waste services should be limited to Community Interest Companies or similar (1), funding and support for communications should be provided (2), and current building design standards and enforcement of these need to be improved to ensure storage and collection of waste is always considered when planning dwellings (1).

11 comments suggested that partnership working would require the removal of the option for waste to be a local political decision, while 2 comments suggested that targets should be based on carbon reduction, which could also cover business innovation and housing design.

## **Question 50: Do you have any other comments to make about Proposal 16?**

148 respondents provided 183 comments which were categorised into 15 substantive suggestions. Most of these comments (156) were provided by local authorities.

54 (39%) respondents felt that partnership working between authorities does achieve savings and improve recycling and delivery of services and many highlighted that authorities are already doing a great deal of work in this area and are already achieving efficiency gains. 31 comments highlighted the various benefits of partnership working such as; cost savings, knowledge sharing, policy alignment and service improvements. 13 respondents highlighted that opportunities to realise benefits will be dependent on the “starting point” of the services, as many services are already achieving maximum efficiency based on the current design.

20 respondents emphasised some of the key conditions that ensure partnerships work, these included; a need for shared objectives, all partners need to be equal and the need to be flexible and able to adapt as service requirements change. There was also recognition that standardised service requirements may help facilitate agreement among partners as the various partners objectives will be further aligned.

27 comments (85% local authorities) highlighted the need for improvements in service financing particularly around ensuring Recycling Credit payments reach Waste Collection Authorities. There was recognition that it appears that there will be a significant amount of change to how much funding will be available and how it will be delivered in the future. Respondents noted that with any restructuring there will be a need to ensure that sufficient funds reach Waste Collection Authorities to pay for necessary enhancements to waste collection systems.

Other comments made included; recommendations that national government should provide capital funding for waste infrastructure (8), and concerns around politics in partnership working (6).

## **Business waste**

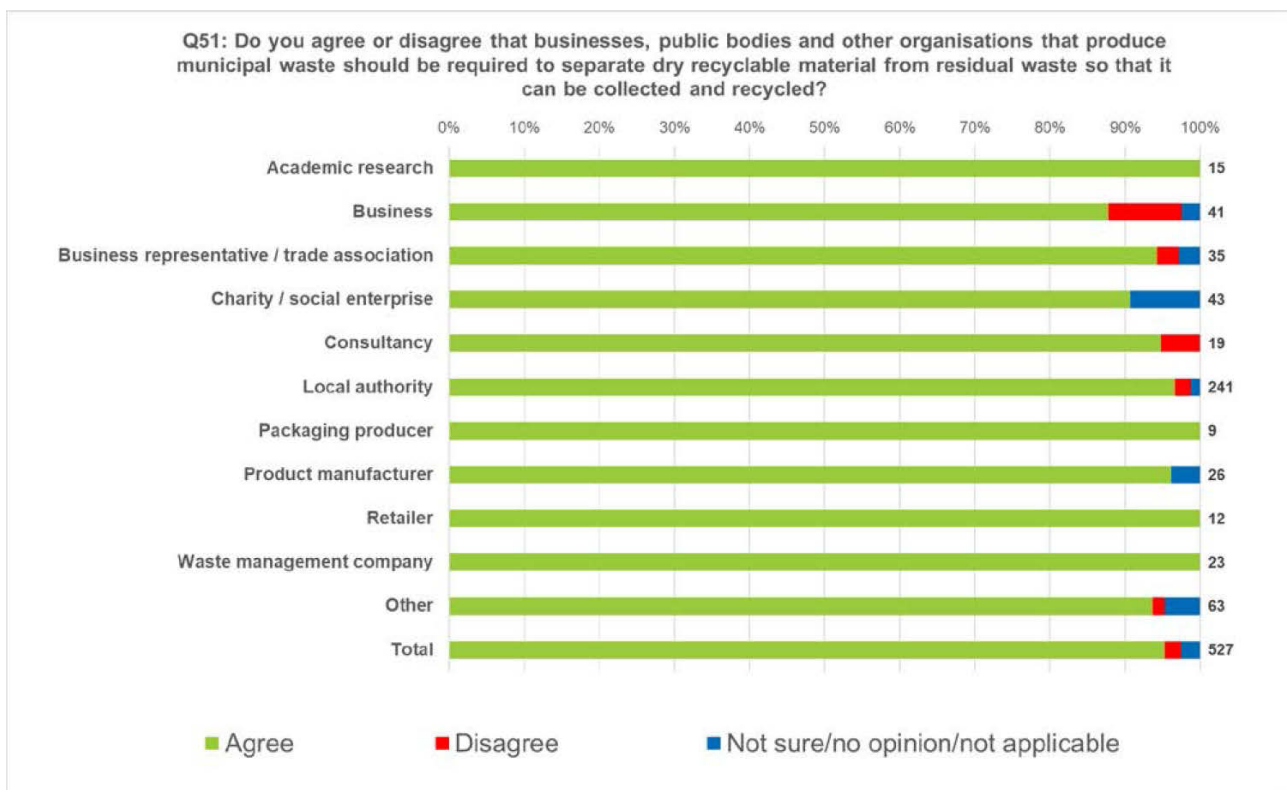
### **Proposal 17: segregation of dry recyclable waste for businesses**

We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

**Question 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: **502 responses (95%)**
- disagree: **12 responses (2%)**
- not sure, don't have an opinion, not applicable: **13 responses (2%)**
- not answered: **4 responses (1%)**

Figure 36 shows the split of responses is based on those who answered (i.e. excludes not answered) by organisation type. The majority of respondents disagreed that organisations producing municipal waste should be required to separate their dry recyclable materials. A small percentage (10%) of businesses disagreed.



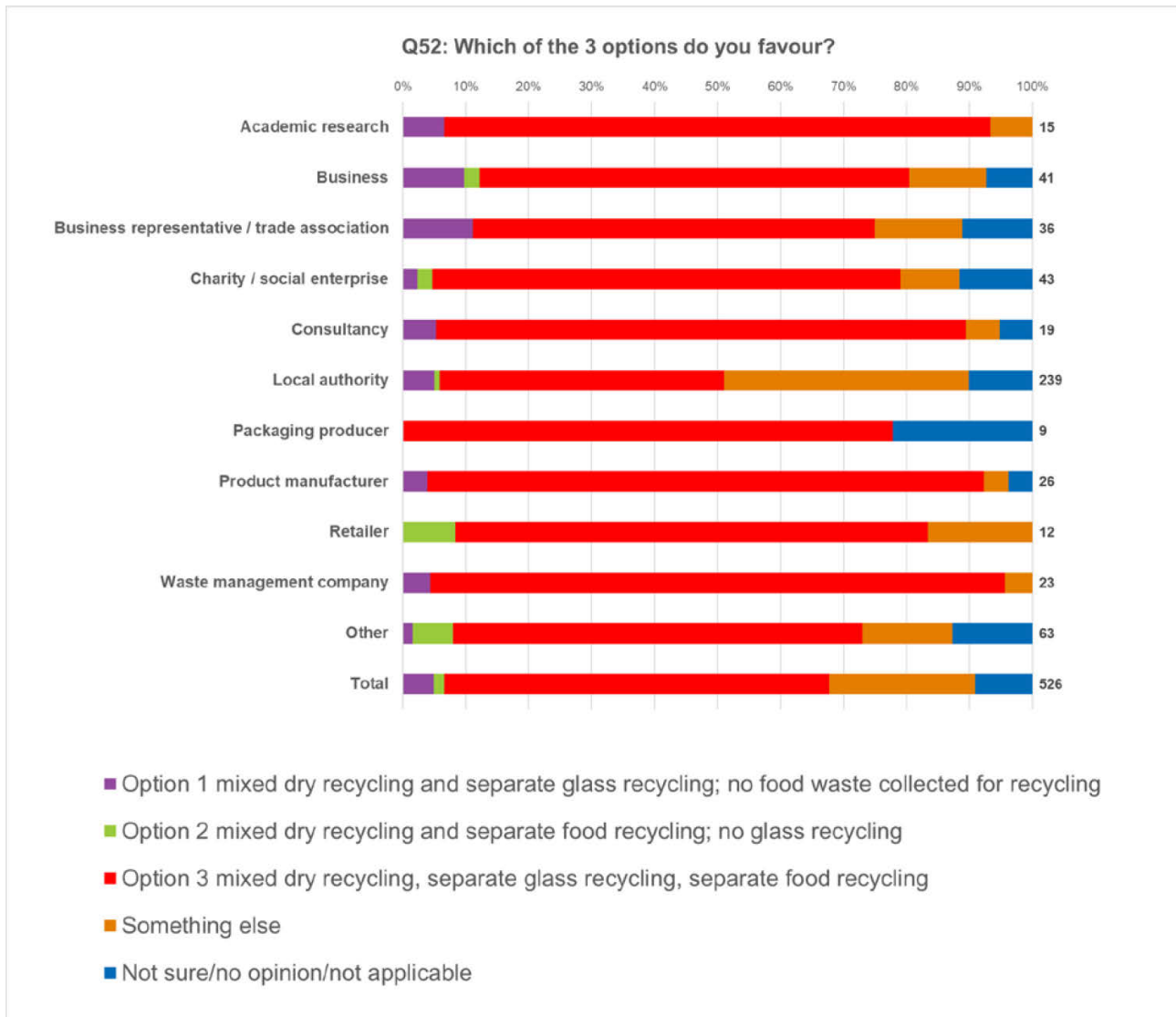
**Figure 36: Q51 analysis for answered responses**

**Question 52: Which of the 3 options do you favour?**

- option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling: **26 responses (5%)**
- option 2 mixed dry recycling and separate food recycling; no glass recycling: **9 responses (2%)**
- option 3 mixed dry recycling, separate glass recycling, separate food recycling: **321 responses (60%)**

- not sure, don't have an opinion, not applicable: **48 responses (9%)**
- something else (please expand): **122 responses (23%)**
- not answered: **5 responses (1%)**

Figure 37 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). The majority (60%) of stakeholders responding favoured option 3 (mixed dry recycling with separate glass and separate food recycling). Only 45% of Local Authorities agreed with option 3, with 39% stating they wanted something else (please see further commentary below).

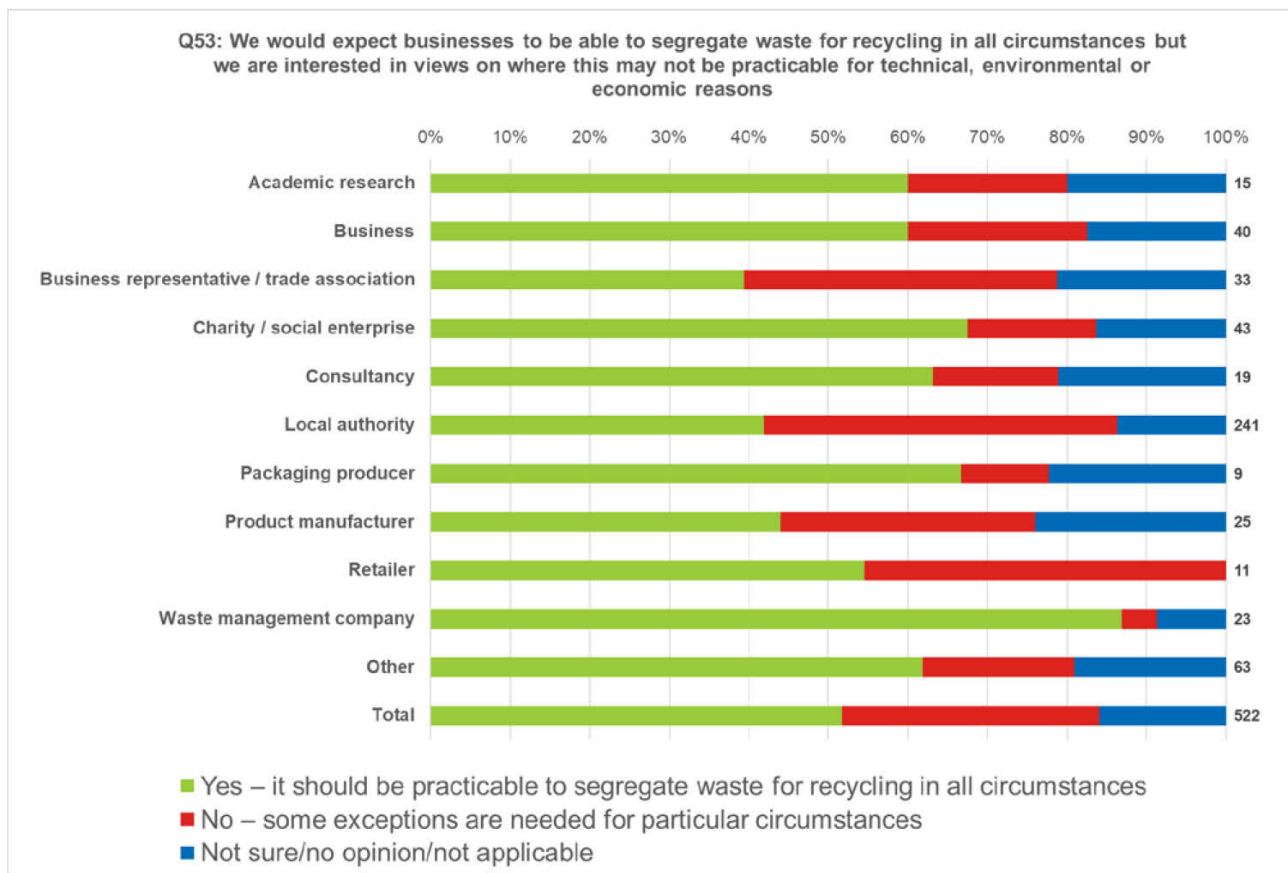


**Figure 37: Q52 analysis for answered responses**

**Question 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: **270 responses (51%)**
- no – some exceptions are needed for particular circumstances: **169 responses (32%)**
- not sure, don't have an opinion, not applicable: **83 responses (16%)**
- not answered: **9 responses (2%)**

Figure 38 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Over half of the total respondents stated that it should be practicable to segregate waste for recycling in all circumstances. Those stakeholders that stated that some exceptions were needed for particular circumstances included Local Authorities (44%), retailers (42%) and business representatives / trade associations (33%).



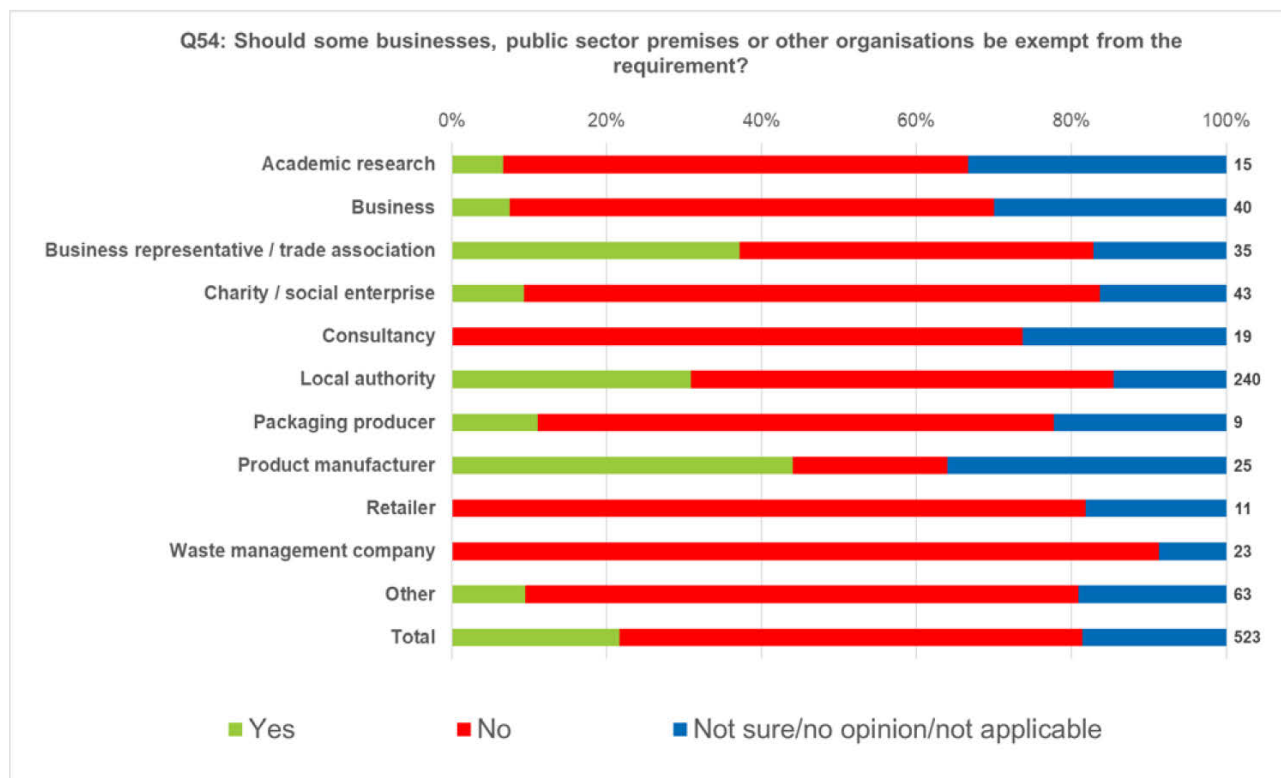


**Figure 38: Q53 analysis for answered responses**

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

- yes: **113 responses (21%)**
- no: **313 responses (59%)**
- not sure, don't have an opinion, not applicable: **97 responses (18%)**
- not answered: **8 responses (2%)**

Figure 39 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Just over half (59%) of the total respondents stated that some businesses, public sector premises or other organisations shouldn't be exempt from the requirement. A total of 21% of respondents stated that yes there should be exemptions, with 42% of Product manufacturers, 33% of business representatives / trade associations and 31% of Local Authorities agreeing with this.



**Figure 39: Q54 analysis for answered responses**

**Question 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?**

238 comments were categorised into 18 substantive subject areas. The vast majority of these (167) were from local authorities.

52 comments suggested that financial incentives could be used as an additional incentive, either through ensuring that the cost of recycling was lower than the cost of residual waste or other non-specified means. However, 21 comments suggested that fines for non-compliance would be most effective; it was, however, noted that this would require an effective enforcement regime.

8 comments suggested that enabling the public to assess each business's recycling commitment or performance, through a form of Trustmark scheme or similar publicity would act as a positive incentive.

8 comments proposed that exceptions to the proposed legislation should be granted where practicalities prevented the full range of recycling to be carried out, where space is too limited or costs are too high; it was also suggested that a TEEP exception in such cases would provide an option for co-mingled collections to be utilised to resolve practical issues of space or cost. 7 comments proposed that businesses located at multi-occupancy buildings and estates should be able to utilise communal recycling facilities to demonstrate collective responsibility for compliance.

17 comments noted the necessity for an improved collection infrastructure, with adaptations (such as sacks) for limited space areas to enable compliance. 5 comments noted that allowing businesses to utilise HWRCs or equivalent commercial facilities for their recyclate would be helpful. 7 comments noted that improvements to the current number and geographical spread of recycling and sorting facilities would be required to provide sufficient capacity and on-transport facilities for collected material.

29 comments suggested that commercial collections should meet the same consistency aims as household waste & recycling services, as this would enable common messaging to reflect recycling options at home and at work.

47 comments favoured the option of permitting and enabling co-collection of business waste and recycling with household recycling; however, concerns were raised regarding any additional reporting requirements which might impact on local authorities.

2 comments expressed concerns regarding the removal of local authorities' current VAT-free status and questioned the proposed range of the legislation, since the definition of municipal waste doesn't currently include industrial waste. This was a concern should the legislation retain the local authority duty to be the 'collector of last resort' upon request.

9 comments suggested that a review of the definitions of businesses would be required, particularly to remove confusion regarding certain categories, particularly Air BnB operations and static caravan sites. It was also emphasised that the legislation should also apply to waste brokers and outsourced waste handlers such as facilities management, estate management and contracted cleaning companies.

20 comments noted the importance of providing education and/or training to businesses and staff regarding the benefits of the new legislation, which should include waste minimisation and re-use activities.

Comments were also received regarding the need for improved capture of business recycling data (1), concerns regarding the possibility of contamination at businesses generating hazardous waste (2) and the need to follow a circular economy approach to minimise waste.

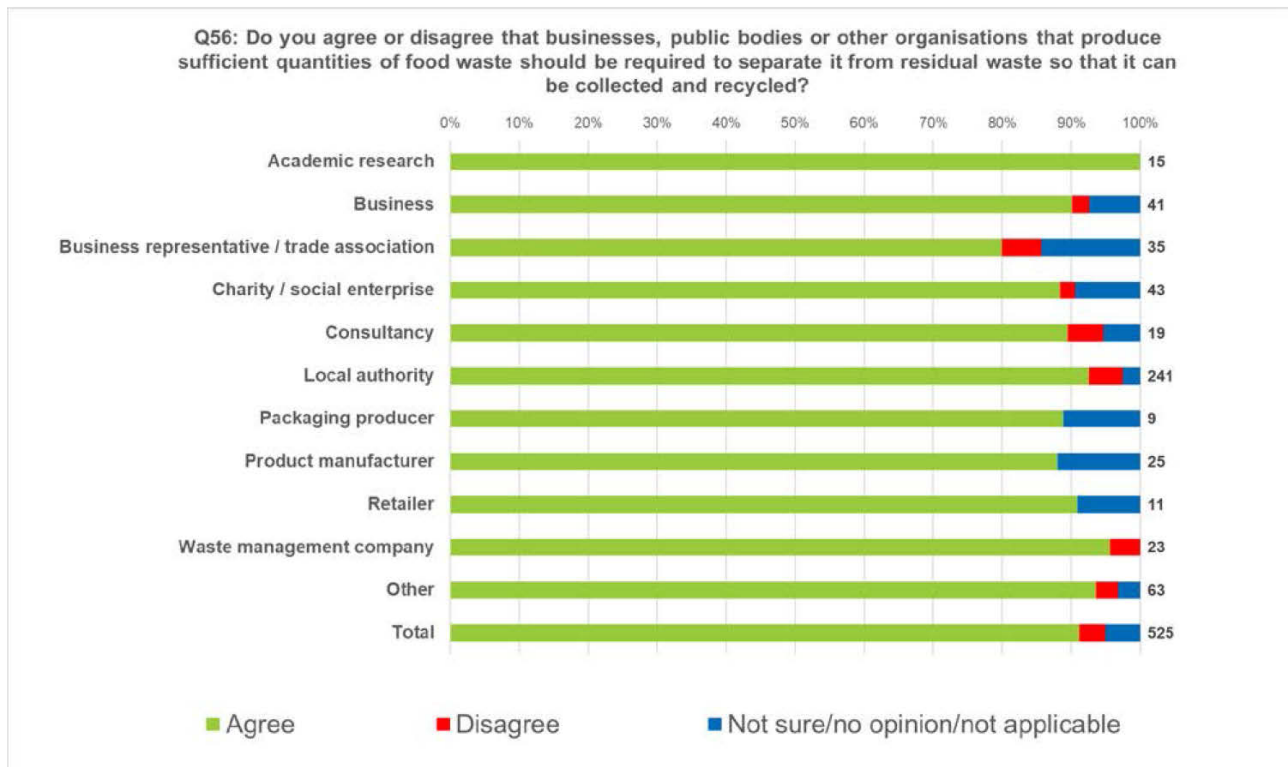
## Proposal 18: segregation of food waste for businesses

Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

**Question 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: **479 responses (90%)**
- disagree: **20 responses (4%)**
- not sure, don't have an opinion, not applicable: **26 responses (5%)**
- not answered: **6 responses (1%)**

Figure 40 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). A large majority (90%) of respondents agreed that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it for recycling.

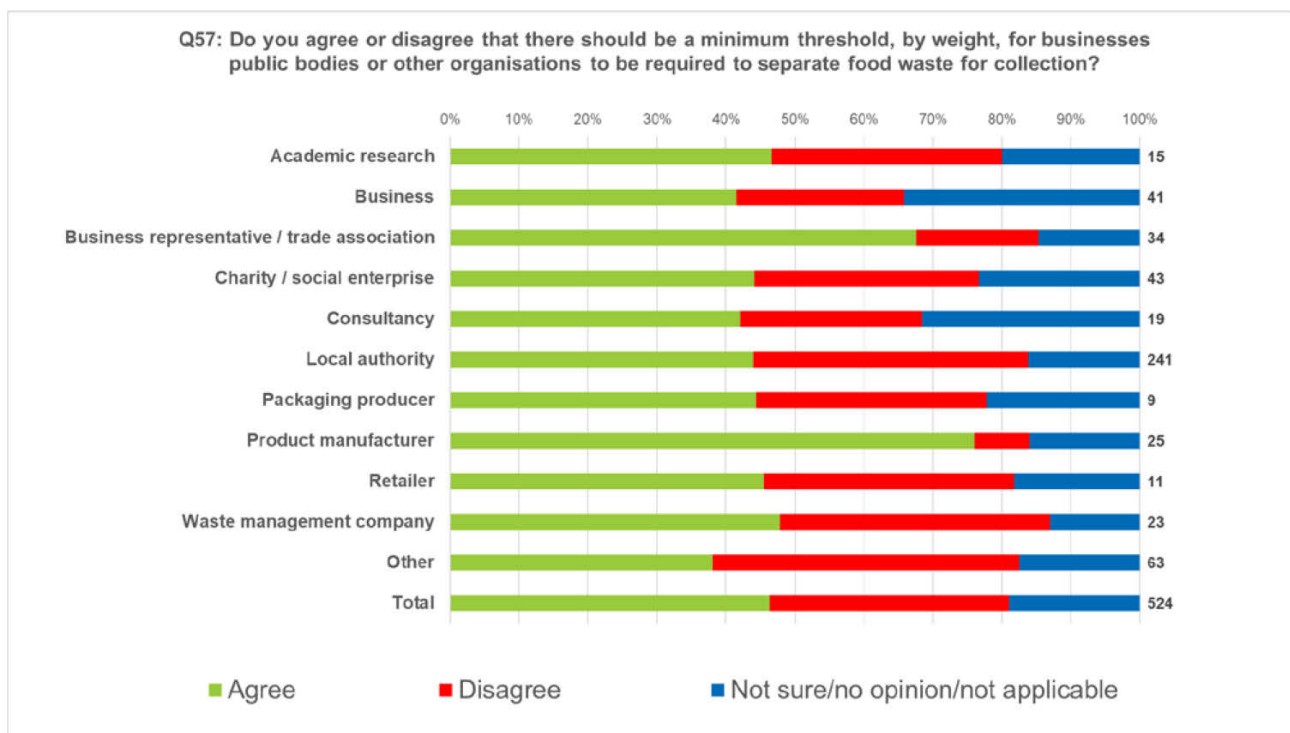


**Figure 40: Q56 analysis for answered responses**

**Question 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: **243 responses (46%)**
- disagree: **182 responses (34%)**
- not sure, don't have an opinion, not applicable: **99 responses (19%)**
- not answered: **7 responses (1%)**

Figure 41 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). There was a mixed response to this question, with 46% of total respondents agreeing, of which Product Manufacturers were in strong agreement (73%); and 34% overall disagreeing, with Local Authorities (40%) and other stakeholders (44%) providing the highest response.



**Figure 41: Q57 analysis for answered responses**

**Question 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?**

282 respondents (53%) provided 339 comments which were categorised into 38 substantive suggestions. Most of these comments (204) were provided by local authorities.

The response stated the most for defining 'sufficient' was to follow the systems and criteria set in place in Scotland, at above 5kg a week, stated by 46 (9%) of respondents. It was stated that this approach would lead to consistency across the UK.

42 respondents said that there should not be a minimal value of food waste, that all food waste produced should be deemed in scope of the regulations. Whilst 40 stated that any business that sells food or has canteen facilities should be within scope.

41 suggested that 'sufficient' should be deemed based on full cost/benefit analysis considering the environmental factors of collections. 27 believed the number of employees and size of the business should be factored into the decision. Whilst 21 commented that the definition should be based weight, and 24 respondents specified 'sufficient' should be based off food waste production levels.

The type of business was mentioned by 16 respondents, as an indicator of likely food waste levels produced.

Food waste levels above that of an average household was commented by 13 respondents. 8 respondents stated 'sufficient' should be defined as a minimum of 240 litres a week. Whilst a specific sum of 15kg a week was given by 7 respondents.

The need for the government to be conscious of how any sort of proportional based compliance regime would be implemented was highlighted by 7 respondents.

Further comments made are; 20kg a week (4), based off of yearly turnover (4), percentage of food intake (3), local authorities should be able to decide (3), should be based on business who have food hygiene inspections (3), definition of sufficient is not required (2), need to avoid loopholes or vague approaches (2), number of containers (2), minimum required for current technology (2), based on property type/size (2), above 25% (2) above 2kg (2).

Comments provided by only 1 respondent are; more than 4 times the average household level (1), 600 litre container a week (1), above 1kg (1), 10kg produced (1), 4kg a week (1), above 20kg a week (1), above 30kg a week (1), 50kg a week (1) same as average household levels (1), it would be wrong to penalise businesses (1), all business premises that pay business rates should be opted in (1), quantity should be set at a practical level (1), and that any threshold should be defined based on a limit to the percentage of total waste produced that does not comply with the scheme (1).

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

371 comments (with some responders providing more than one comment) were categorised into 22 substantive suggestions. The majority of these (235) were from local authorities.

The majority of comments (134) confirmed the respondents' view that this requirement should apply to any business or organisation that sells, distributes, makes or processes food.

However, other responders provided differing suggestions regarding the organisations to whom the proposal should apply; these included any business or organisation that generates food waste (45), food retailers (13), any business or organisation that generates over 50% of its revenue through selling, distributing or making/processing food (3), and larger companies only (definition unspecified) (5). 6 respondents felt the requirement should only apply to those producing, rather than packaging food.

2 comments suggested the requirement should be limited to businesses producing more than the domestic average proportion food waste, whilst 3 comments suggested that the requirement should be limited to businesses with above a minimum number of staff in the organisation (5 and 10 staff were suggested).

Respondents suggested a variety of methodologies for identifying organisations to whom the proposal should apply; these included businesses required to have a food hygiene rating (37), businesses governed by the Food Standards Authority (21), utilisation of the 'Food Waste Scotland' regulations (17) and use of Standard Industrial Classification (SIC) codes (7).

A high number of comments (64) suggested the proposal should apply to businesses where employees' own food is consumed on site, regardless of the nature of the business.

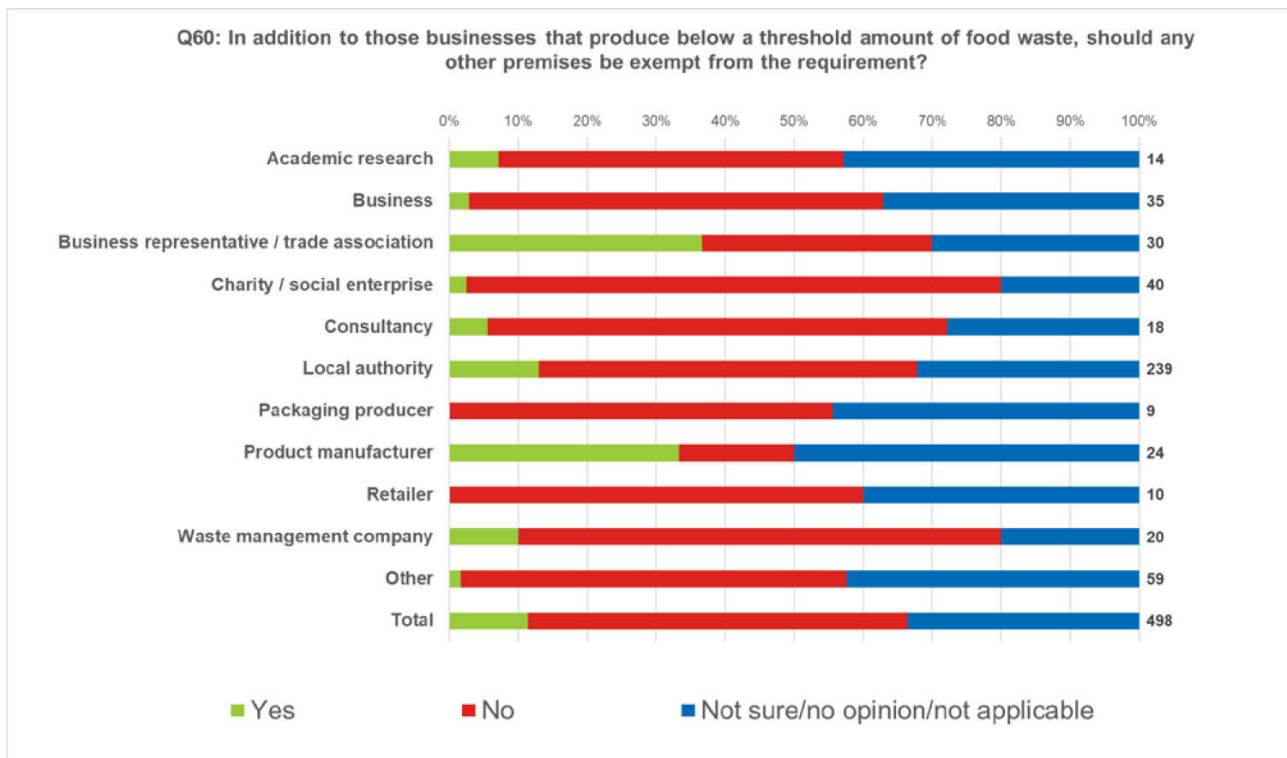
A suggested exclusion from the proposal were horticultural activities where food waste is part of, and inseparable from, plant waste (3).

The need for collective responsibility at multi-occupancy buildings and estates was suggested by 5 respondents.

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

- yes: **57 responses (11%)**
- no: **274 responses (52%)**
- not sure, don't have an opinion, not applicable: **167 responses (31%)**
- not answered: **33 responses (6%)**

Figure 42 shows the split of responses by organisation type and is based on those who answered (i.e. excludes not answered). Just over half (52%) of total respondents stated no, that no other premises should be exempt from the requirement. The highest proportion of 'no' responses came from charities (72%) and consultancies (63%). Almost one third of respondents were either not sure or didn't have an opinion on the question.



**Figure 42: Q60 analysis for answered responses**

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

138 comments were categorised into 21 substantive suggestions. The vast majority of these (104) were from local authorities.

Two particular issues were raised: 29 respondents felt it was important to ensure that appropriate processing and transport infrastructure would be in place before this requirement is enforced. The need for sufficient capacity, and a transport infrastructure to facilitate tipping and on-transport facilities for collected material was seen as an integral element to enable the operational success of this proposal.

However, 12 responses highlighted the potential negative impact on current disposal routes, noting the reliance of MBT plants on the biological content of waste, and the impact on EfW plants of changes in the calorific value of waste inputs.

26 respondents emphasised the importance of ensuring that the promotion of food waste avoidance was prioritised as preferable to recycling. A further 4 respondents suggested that redistribution of edible food should be considered as preferable to recycling.

Harmonising business and household collection schemes to simplify communication and education was suggested by 9 respondents, with a further 3 suggesting co-collection of these streams; a further 7 responses focussed on the need for education for businesses, with particular regard to contamination issues.

The need for appropriate funding for the collection infrastructure required was suggested by 13 respondents, with a further 7 focussing on the need for a combination of clear targets, appropriate reporting systems and meaningful enforcement being required. A further 5 responses considered that Duty of Care requirements should be enhanced to provide clarity.

Other responses considered the use of the 'Food Waste Scotland' regulations, or the Welsh or Northern Irish equivalents (3), and the need for collective responsibility at multi-occupancy buildings and estates (3). Finally, 4 responses highlighted the practical issues involved in de-packaging unsold food waste, with a further 4 suggesting exemptions may be appropriate where other regulations or requirements (such as ABPR) are already in place.

## **Proposal 19: supporting businesses to reduce costs**

If the measures at Proposal 18 are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the financial burden on small and micro businesses.

### **Question 62: What are your views on the options proposed to reduced costs?**

535 comments were categorised into 23 substantive suggestions. The most prevalent topics are summarised below. The vast majority of these (205) were from local authorities.

137 councils and businesses support the measures outlined in the document noting they are comprehensive and should provide adequate options to reduce the financial burdens faced by smaller businesses especially to ensure that the transition is feasible for small and micro businesses. They believe it is paramount for the model to work and that they should be considered realistically. There are so many costs to small and medium sized businesses, if this is mandatory, they need financial help. Some consideration should be given to reducing the burden on social and community enterprises

107 stakeholders supported the idea of working collaboratively. Agreeing on frameworks for collaborative procurement projects, commercial waste drop off points and shared collection zones. It was noted that users could be charged a nominal fee based on weight of the material or a standard flat rate. Furthermore, greater flexibility in waste contracts would be welcomed for firms to participate in the recycling stream such as pooled collection services. Zoning or waste franchising within local authority areas, appears to be the most likely option to reduce costs to businesses, especially small and micro-sized firms.

Polluter pays principle was raised by 19 stakeholders. Businesses should be considering this process to drive innovation and efficiency. A number of these believed that those who



demonstrate they are part of the circular economy or a zero waste business should be incentivised.

48 Stakeholders mentioned that they did not understand how the proposal could achieve cost savings or did not agree that it would. 37 stakeholders noted that without additional data and business knowledge they could not comment. For instance, how are councils able to calculate the waste flows from a business perspective. They felt government would be best to comment.

58 stakeholders noted that no new cost burdens should be imposed on local authorities.

Some of the proposals set out in the consultation document are unworkable as they stand. 8 stakeholders noted that major changes to existing UK contractual arrangements and procurement legislation will be required if these suggested measures are to be feasible.

Phased introduction and incentives for small and micro businesses were raised by 11 stakeholders. However, they feel that where businesses are being run from a household if the household waste collection service is to be used a small charge should be applied on a sliding scale depending on the business. This point was supported by the topic of segregating businesses dependant on their size which was also raised.

16 noted comments on local franchising suggesting it is unclear how this option would work and whether it would be anti-competitive although it has potential benefits more information is needed. 8 stakeholders suggested that the Extended Producer Responsibility (EPR) system may impact viability of any such recycling schemes and that EPR revenue should be used to collect packaging materials from household only.

### **Question 63: Are there other ways to reduce the cost burden that we have overlooked?**

130 comments were categorised into 18 substantive suggestions. The vast majority of these (100) were from local authorities.

Five suggestions were notable, receiving double digit support. The suggestion most common among responders (29 recommended) was that small and micro scale businesses should be permitted to use local authority household waste collection services for materials that are similar to household waste streams. A number of the local authority respondents recognised that many micro and small businesses use local authority services anyway, albeit illicitly and without paying. The majority of the respondents suggested that businesses should pay for the service, while a minority recommended the services should be free or business should only pay for material over the normal household container capacity.

23 responses recommended that some form of financial support or incentive should be considered to encourage participation or limit the burden on businesses, local authorities or waste collectors. Suggestions ranged widely from tax incentives to central government

supplying containers directly to businesses or reimbursing waste collection companies any net costs incurred for the extension of collection services to micro and small businesses. Separate to this, 7 of respondents proposed that the cost burden of higher levels of waste segregation should be recovered by placing a higher charge on the residual waste collection and disposal cost.

15% of respondents felt that there was a need for some form of education, training and technical support to businesses. Various suggestions have been put forth including advice on waste minimisation, waste auditing and business to business mentoring.

13 respondents emphasised the importance of allowing businesses to share collections and storage facilities. A further 5 respondents suggested that small and micro businesses should be allowed to use household waste and recycling facilities. .

The need for flexibility allowing businesses to store material for longer to reduce collection frequencies was also suggested by 12 respondents.

Other responders recommended a greater focus should be placed on extended producer responsibility and take back (5), and that the cost burden should be placed on the more polluting businesses (4).

### **Question 64: Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?**

302 comments were consolidated from 244 responders and categorised into 27 substantive suggestions. The vast majority of these (132) were from local authorities,

Three common recommendations in the received responses were evident; firstly 64 of the respondents highlighted the importance of education, communication and an associated feedback loop would be important factors in the adoption of the proposals. Various suggestions were put forward; however, a central theme was the role both central government and local authority should play in support to businesses. Furthermore, of these 11 responses noted that WRAP could play an important role in supporting businesses through guidance and communication programmes. 8 respondents noted that a web portal would support accessibility.

Secondly, 60 responses identified the need for some form of financial support to businesses and locally authorities. 25 of these responses identified that reforms of Extended Producer Responsibility regulations in England could assist through providing funds for local authority services.

Thirdly, 41 respondents agreed with the need to support businesses through the provision of guidance and advice to understand how to adopt the proposed changes. Key suggestions included guidance on how to assess their current baseline, the most appropriate options to enhance their waste recycling performance. A number of responses

also specifically highlighted the need for targeted advice on the management of food waste.

24 responses highlighted that incentives could play an important role in adoption. Examples noted included the reduction of taxes when a business's recycling performance reaches a certain level or making recycling services cheaper to businesses compared to residual waste collection and disposal.

Other respondents considered the inclusion of a transition periods as being important (13), and the need for collective responsibility at multi-occupancy buildings and estates (3). Finally, 9 responses highlighted the role planning rules and building regulations could play in ensuring suitable space within new developments for waste storage, with a further 8 suggesting that encouraging the establishment of shared waste storage facilities would be beneficial.

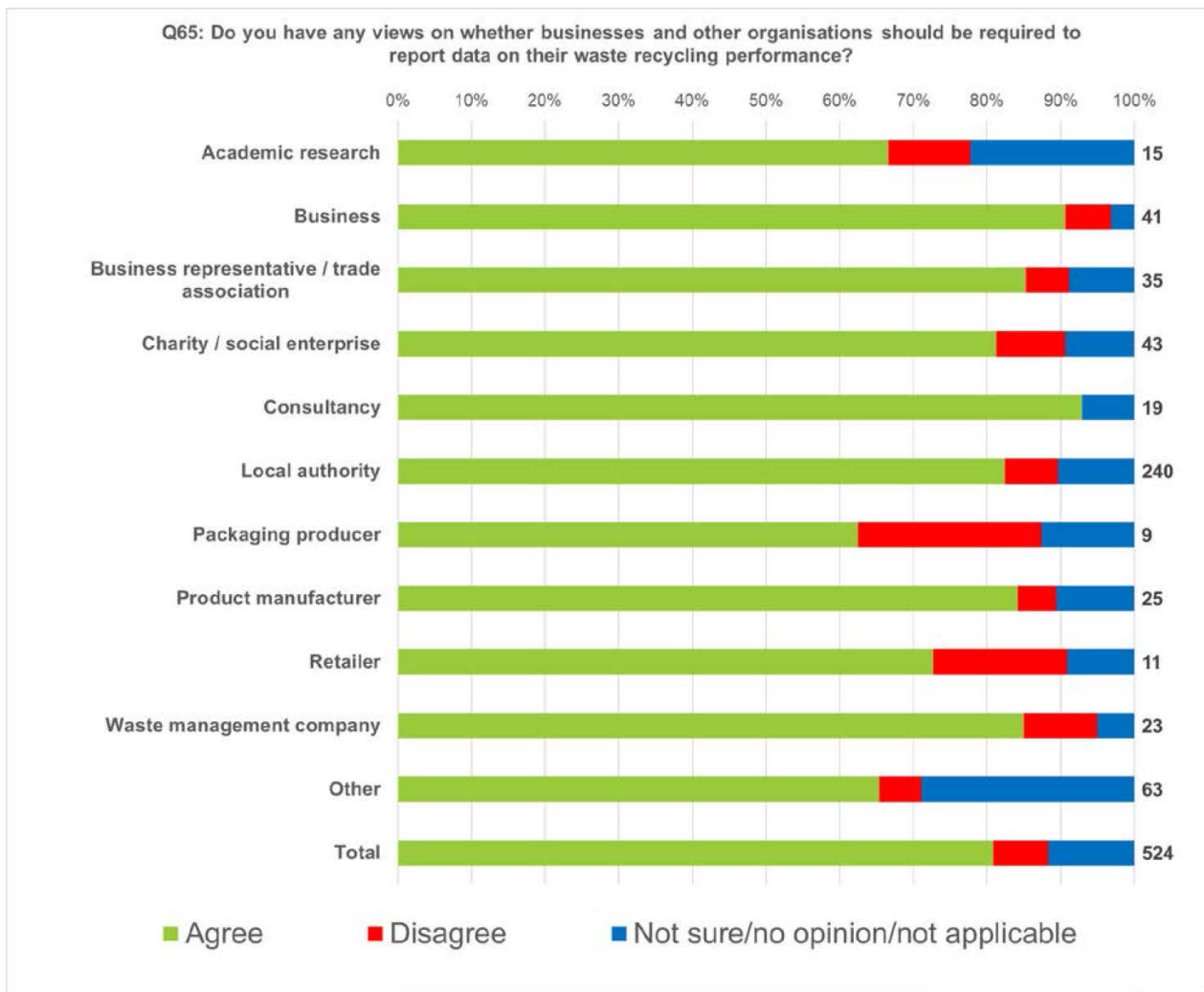
## Proposal 20: data reporting for businesses

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

### Question 65: Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- agree: **375 responses (71%)**
- disagree: **35 responses (7%)**
- not sure, no opinion, not applicable: **54 responses (10%)**
- not answered: **67 responses (12%)**

In total and across each organisation type there is relatively high agreement that businesses and other organisations should be required to report data on their waste recycling performance. Figure 43 shows the split of responses by organisation type and is based on those who answered (i.e. excludes Not Answered).



**Figure 43: Q65 analysis for answered responses**

Those that disagreed noted the following:

- administrative burden, especially for small businesses (11)
- reporting of data ensures that consumers are aware of the performance. We believe that there is an opportunity for the reporting to be tied into other schemes to reduce the workload of the local authority or business rather than operate as a separate, additional requirement (7)
- it will cost money for businesses to conform (3)
- we are not clear what purpose/benefit this activity would serve (2)
- businesses are paying for waste collection, so the burden should be placed on the waste carriers (2)
- waste of time and money (1)
- larger business only (1)
- reduction of environmental impact associated with resource management (1)
- it must be cost effective (1)
- challenge to collate data (1)
- greater technology required to help i.e. bin weighing (1)

- this will discourage recycling for the right reasons - it will only work if it is simple and hassle free (1)
- greater detail/clarification required (1)

### **Question 66: Do you have any other comment on Proposal 20?**

330 comments (with some responders providing more than one comment) were categorised into 33 substantive suggestions. The vast majority of these (77%) were from local authorities.

The most common comment (62) was general support for the proposal and a recognition of the need to capture data from commercial and industrial waste producers to provide a full picture of municipal waste generation in England. 26 respondents felt that reporting and data capture should be mandatory. A further 22 comments felt that the recorded data should be made public, reasons given included to ensure full transparency and enable customers to make more informed decisions based on a company's environmental performance.

54 comments highlighted that the system should align with local authority reporting requirements using existing data reporting mechanisms such as WasteDataFlow. 9 respondents identified the government's E-Doc system as a possible platform which could be upgraded for use. 19 respondents believed a new system may need to be developed. A further 23 comments highlighted the need for standardised and consistent approach. 4 respondents felt that a data capture and reporting requirement would be over bureaucratic for businesses.

20 comments emphasised the need to limit the burden on businesses by making the data capture and reporting requirements as simplistic as possible. 12 comments – all from local authorities - believe that there is an opportunity to integrate new reporting requirements into other existing schemes to reduce the workload of the local authority or business rather than operate as a separate requirement. Noted examples included the duty of care and environmental health checks.

15 comments identified waste collection contractors as best placed to capture waste data and report on behalf of businesses. 16 comments highlighted the need for smart solutions such as smart waste tracking (4 comments) or onboard weighing (12 comments). 5 respondents felt that onboard weighing should be mandatory and 7 recommended that central government would need to provide funding for onboard weighing to local authorities where they collected trade waste.

## Annex A – list of organisations who responded

Greater Manchester

ACS

ADBA

ALB

Alliance for Beverage Cartons and the Environment (ACE UK)

Alternatives to Plastic

Amtcor Ltd.

Amey plc

Andigestion Ltd

Animal Free Research

AQUAPAX (Just Drinking Water Ltd)

ARDEX UK LIMITED

Argent Energy

Artworks (Midlands) Ltd

Ashfield District Council

Ashford Borough Council

Askew Road Plastic Free group

Automatic Vending Association

Axion Polymers

Aylesbury Vale District Council (AVDC)

Ball Aerosol Packaging UK Ltd

Ball Beverage Packaging Europe

BAM Nuttall Ltd

Bangor University

Barnsley Metropolitan Borough Council

Barrowden PC

Basildon Borough Council  
Basingstoke and Deane Borough Council  
BCP  
BCP Council  
Beckenham  
Bedford Borough Council  
Benders Paper Cups  
Biffa  
Bio Products Laboratory  
Bio-Based and Biodegradable Industries Association (BBIA)  
Biogen  
Birmingham City Council  
Bishopthorpe Parish Council  
Blaby District Council  
BLACKBURN WITH DARWEN BOROUGH COUNCIL  
Blue Goose Coffee  
Borough Council of King's Lynn & West Norfolk  
Bournemouth, Christchurch & Poole Council  
Bracknell Forest, Reading and Wokingahm Borough Councils  
Braintree District Council  
Brighton and hove City Council  
British Aerosol Manufacturers' Association  
British Beer and Pub Association  
British Plastics Federation  
British Retail Consortium (BRC)  
British Soft Drinks Association (BSDA)  
British Toy & Hobby Association  
Broadland District Council  
Broadland District Council and South Norfolk District Council  
Bromsgrove District Council, Parkside, Market Street, Bromsgrove, B61 8DA

Broxtowe Borough Council  
Bryson Recycling  
Buckinghamshire County Council  
Bug housing cooperative  
BUILDING ADHESIVES LIMITED  
Bunzl Catering Supplies.  
Burnley Borough Council  
Bury MBC  
Cambridge City Council and South Cambridgeshire Council  
Cambridgeshire County Council  
Canford Magna Parish Church  
Canned Wildlife  
Cannock Chase Council  
Canterbury City Council  
Carlisle City Council  
Castle Point Borough Council  
Cedo Ltd  
Central Bedfordshire Council  
Charity - WRAP  
Charlie Trousdell Associates Ltd  
Charnwood Borough Council  
Chartered Institution of Wastes Management (CIWM)  
Chelmsford City Council  
Cherwell District Council  
Cheshire East Borough Council  
Cheshire West and Chester Council  
Chesterfield Borough Council  
Childbase Partnership  
Chiltern District Council  
Chiltern Railways



Chorley Borough Council  
Churchinford & District Community Shop  
City of Bradford Metropolitan District Council  
City of London Corporation  
Coca-Cola European Partners / Coca-Cola Great Britain (Joint Submission)  
Cofresco Foodservice  
Colchester Borough Council  
Colpac  
Combined Authority"  
Community R4C  
Comply Direct Ltd  
Confederation of Paper Industries (CPI)  
Consortium of Independent Recycling Companies  
Co-operative Food  
CooperVision  
Copeland Borough Council  
Cornwall Council  
Cory Riverside Energy  
Council of City of Wakefield  
Cranfield University  
Cransley Hotel  
Cumbria County Council  
Dacorum Borough Council (herein referred to as DBC)  
Danone UK&I  
Dart Products Europe (Dart)  
Daventry District Council  
David Rose Packaging Solutions  
Delaware North UK  
Deloitte digital  
Department for International Trade

Derbyshire County Council

Derbyshire Dales District Council

Devon Authorities Strategic Waste Committee – a partnership of local authorities comprising of Devon County Council, Torbay Council, East Devon District Council, Exeter City Council, Mid Devon District Council, North Devon Council, South Hams District Council, Teignbridge District Council, Torridge District Council and West Devon Borough Council.

Devon County Council

DNV GL

Doncaster Council

Dorset Council

Dover District Council

DP World London Gateway

Disposal Ltd

Dudley Metropolitan Borough Council

Durham County Council

Ealing Council

East Dorset Friends of the Earth local group

East London Waste Authority

East Riding of Yorkshire Council

East Staffordshire Borough Council

East Sussex County Council

Eastleigh Borough Council

Ecolateral

Ecosurety Ltd. Producer Compliance Scheme for Packaging, WEEE and Batteries

Ecover

Eden District Council

Ella's Kitchen

Elmbridge Borough Council.

Enlightenment Economics

Environmental Industries Commission

Environmental Packaging Solutions  
Environmental Services Association (ESA)  
Epping Forest District Council  
Epsom & Ewell Borough Council  
Essex County Council  
Eversden Village Hall  
Exeter City Council  
Extinction rebellion  
Faerch UK Ltd  
Fareham Borough Council  
Farplants Group (including Binsted Nursery, Walberton Nursery and Fleurie Nursery)  
FCC Environment  
Fenland District Council  
Folkestone & Hythe District Council  
Foodservice Packaging Association  
Fresh Produce Consortium  
Frith Resource Management Ltd  
FSB  
Futamura Chemical UK Limited  
Garden Blueprints  
GC Business Growth Hub  
Girlguiding  
Global Feedback  
Gloucester City Council  
Gloucestershire Joint Waste Committee comprising Cheltenham B.C, Cotswold D.C,  
Forest of Dean D.C, Gloucestershire C.C and Tewkesbury B.C.  
GNF Browning  
Gosport Borough Council  
GRAVESHAM BOROUGH COUNCIL  
Greater Anglia

Green Alliance  
Greenredeem Ltd  
Greggs  
G's Fresh Ltd  
Guildford Borough Council  
Haddenham Ely  
Hambleton District Council  
Hampshire County Council  
Harborough District Council  
Harlow Council  
Harrow U3A Sustainability Group  
Hart District Council  
Heath, safety and waste advisor  
Hertfordshire County Council  
Hertfordshire Waste Partnership  
Hertsmere Borough Council (HBC)  
High Peak BC  
Hinckley and Bosworth Borough Council  
Hixsons Business Enablers  
Horticultural Trades Association  
HSSMI Ltd.  
Hubbub Foundation UK  
Huhtamaki UK  
Hull City Council  
Huntingdonshire District Council  
I work for the Royal Borough of Windsor and Maidenhead- a unitary authority.  
ICELAND FOODS LTD, APPROX 1,000 STORES ACROSS THE UK  
independent waste consultant  
Industry Council for Packaging and the Environment - INCPEN  
Innocent drinks

Innovia Films

Islington Council

John Mills Ltd

Joint Waste Solutions (JWS).

Keep Britain Tidy

Kensington and Chelsea Council

Kent County Council

Kent Resouce Partnership

Kingsmen Consultants & Youlgrave Community Land Trust

Kingston Environment Centre and Green Futures Festivals Co Ltd

Kirklees Council

Klockner Pentaplast

Knowsley Metropolitan Borough Council

L.E.K. Consulting

Lancashire County Council

LARAC

LB Merton

Leeds City Council

Leicester City Council

Leicestershire County Council (Waste Disposal Authority)

Lemon Balm

Lewes District Council and Eastbourne Borough Council

Lincolnshire County Council

Lincolnshire Waste Partnership

Local Authority Partnership - The South Yorkshire Waste Partnership, an informal partnership of Barnsley MBC, Rotherham MBC, Doncaster MBC and Sheffield City Council

Local Authority Waste Management Partnership

Local Community - Sunray Community

Local government network; Association of Directors of Environment, Economy, Planning and Transportation (ADEPT)

London Borough of Barnet

London Borough of Camden  
London Borough of Enfield  
London Borough of Hackney  
London Borough of Haringey  
London Borough of Hounslow  
London Borough of Lambeth  
London Borough of Newham  
London Borough of Southwark  
London Borough of Sutton  
London Borough Of Tower Hamlets  
London Borough of Waltham Forest  
London Riverside Business Improvement District  
LUC  
Luton Council  
Lymphoma Action  
Malaby Biogas Ltd  
Maldon District Council  
Malvern Hills District Council  
Manchester City Council  
Manchester Metropolitan University  
Mansfield District Council  
Marble Hill Playcentres  
Marwell Wildlife  
Mcdonalds  
Medway Council  
MEL Research  
Melton Borough Council  
Member Council of the Kent Resource Partnership  
Merseyside and Halton Waste Partnership (MHWP). The partnership includes the statutory waste collection and disposal authorities of Halton Borough Council, Knowsley Council,

Liverpool City Council, Merseyside Recycling and Waste Authority (MRWA), Sefton Council, St Helens Council and Wirral Council.

Metal Packaging Manufacturers Association

Metropolitan Borough Council

Mid Sussex Wood Recycling

Middlesbrough Council

Mission HERU Ltd

Mole Valley District Council (MVDC)

Muller UK&I llp

National Association of Waste Disposal Officers

Natural Hydration Council

Neal's Yard Remedies

Nestle

Nestle Product Technology Centre

Nestlé UK & Ireland

New Forest District Council

Newark and Sherwood District Council

Newcastle City Council

Newcastle-under-Lyme Borough Council

Newland. Witney

Noorthaw and Cuffley Parish Council

Norfolk County Council

Norfolk Waste Partnership

Norledge

Norse Environmental Waste Services Ltd

North Devon Council

North East Lincolnshire Council

North Herts District Council and East Herts District Council – Joint waste service"

North London Waste Authority (NLWA)

North Norfolk District Council

North West Leicestershire District Council

North Yorkshire County Council

Northamptonshire Waste Partnership: Corby Borough Council, Daventry District Council, East Northamptonshire Council, Kettering Borough Council, Northampton Borough Council, Northamptonshire County Council, South Northamptonshire Council, Borough Council of Wellingborough

Northumberland County Council

Nottinghamshire County Council

Novamont SpA

Novelis UK Ltd - Reprocessor

Nuneaton and Bedworth Borough Council

Nupik-Flo UK Ltd

Oadby and Wigston Borough Council

Officer Response on behalf of Bath & North East Somerset Council

Olleco

OPRL

Orsted UK

Oxford City Council/ Oxford Direct Services

Oxfordshire County Council

Oxfordshire Environment Partnership

Packaging Compliance Scheme

Packaging Scheme Forum

Palm Recycling Ltd

Pam Nelson

Paper Cup Alliance

Pendle Borough Council

Penny Post Ltd

PepsiCo

Personal Touches

Peter Cox Associates

Peterborough City Council



Pets at Home Ltd

Plastic Free Aberporth (part of Surfers Against Sewage campaign)

Plastic Oceans UK

Plymouth City Council

Plymouth Community Homes

Policy Connect - Cross-party public policy think tank

Poole Flag Trust

Portsmouth City Council

Preston Plastics - Plastics Reprocessor

Provision Trade Federation

Raw material manufacturer of packaging steels

RECAP WASTE Partnership which consists of 6 WCA and 2 WDA in Cambridgeshire and Peterborough

RECOUP

Recycling Technologies - plastics reprocessor (feedstock recycling)

Redditch Borough Council, Town Hall, Walter Stranz Square, Redditch B98 8AH

Reigate & Banstead Borough Council (460 staff/60,000 households), part of The Surrey Environment Partnership (made up of the Borough's and Districts of Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Reigate and Banstead, Runnymede, Spelthorne, Surrey Heath, Tandridge, Waverley, Woking and Surrey County Council).

Renewi UK Services Ltd.

Reprocessor, Collector, Designer and Manufacturer

Resource Association

Revive Your Space

Ribble Valley Borough Council

Rochdale Borough Council

Rochford District Council

Rosendale Borough Council

Rotherham Metropolitan Borough Council

Royal Borough of Kingston Upon Thames

Royal Holloway Students' Union

Rushcliffe Borough Council  
Rushmoor Borough Council  
Rutland County Council (unitary)  
Sainsbury's Supermarkets Ltd  
Scarborough Borough Council  
Scoop Zero Waste  
Seda UK Ltd  
Sedgemoor District Council  
Sefton Council  
Sevenoaks District Council –Waste Collection Authority  
Severn Trent Green Power  
SGS  
Sheffield City Council  
Shropshire Council  
Single Use Alternatives Ltd.  
Sodexo UK&I; Service provider  
Solihull Metropolitan Borough Council  
Somerset County Council  
Somerset Waste Partnership  
Sorting Office  
South Gloucestershire Council  
South Hams District Council  
South Holland District Council  
South Kesteven District Council  
South Lakekand District Council  
South London Waste Partnership  
South Norfolk Council  
South Northamptonshire Council  
South Oxfordshire District Council  
South Ribble BC

South Ribble Borough Council

South Tyne and Wear Waste Management Partnership (STWWMP), comprising Gateshead, South Tyneside, and Sunderland City councils

Southampton City Council

St Augustine Community Centre

Stafford Borough Council

Staffordshire County Council

Staffordshire Moorlands DC

Stevenage Borough Council

Stockton Borough Council

Stoke-on-Trent City Council

SUEZ Recycling & Recovery UK

Surrey County Council are the Waste Disposal Authority for Surrey

Surrey Heath Borough Council (SHBC)

Surrey Heath Tree Wardens

Sustain: the alliance for better food and farming

Swillington Parish Council

Taylor's of Harrogate

Teignbridge District Council

Telford and Wrekin Council

Tesco PLC

Test Valley Borough Council

Tewkesbury Borough Council

The Association for Public Service Excellence

The Auckland Project

The Consortium of In-Vessel Composting Operators (CIVCO)

The constituents of the Kent Resource Partnership (KRP) are the twelve district councils (the Waste Collections Authorities: WCAs) and Kent County Council (the Waste Disposal Authority: WDA). These are, in alphabetical order: - Ashford BC, Canterbury CC, Dartford BC, Dover DC, Folkestone & Hythe DC, Gravesham BC, Kent CC, Maidstone BC, Sevenoaks DC, Swale BC, Thanet DC, Tonbridge & Malling BC and Tunbridge Wells BC.

The House of St Barnabas

The London Borough of Havering

The London Borough of Havering

The Natural History Museum

THE PACKAGING FEDERATION

The Paper Cup Recovery and Recycling Group

The Recycling Association

The Renewable Energy Association

The Searchlight

The Suffolk Waste Partnership

The Surrey Environment Partnership (made up of the Borough's and Districts of Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Reigate and Banstead, Runnymede, Spelthorne, Surrey Heath, Tandridge, Waverley, Woking and Surrey County Council).

The Tool Connection Ltd

The West Sussex Waste Partnership consists of West Sussex Council County as the Waste Disposal Authority and all of the Waste Collection Authorities in West Sussex – Adur District & Worthing Borough Councils; Arun District Council; Chichester District Council; Crawley Borough Council; Horsham District Council and Mid Sussex District Council.

Thinkstep Ltd

Three Rivers District Council

Thurrock Borough Council

Tilda Ltd

Tollard Court

Torbay Council

Trade Association

Trade Association - Cosmetic, Toiletry and Perfumery Association

Trafford Council

Transition Chesptow: Plastic Free Chepstow

Traverse

Travis Perkins plc

UK Cleaning Products Industry Association

UKRI staff

Unilever UK & Ireland

University of Bath

University of Exeter

University of Sheffield

University of Warwick, Warwick Manufacturing Group (WMG)

Uttlesford District Council

Vale of White Horse District Council

Valley Organics

Valpak Limited, Producer Compliance Scheme, approximately 150 employees

Vegware

Veolia UK

Viridor

Wainbody house

Warwickshire Waste Partnership – North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council, Warwickshire County Council. The 6 authorities have formed a partnership which is not a legal partnership but the authorities work together to progress the Warwickshire Joint Municipal Waste Management Strategy. Individual partners may also respond in their own right

Waste Collection Authority

Waste Treatment Technologies B.V.

Wastesavers

Watford Borough Council (WBC)

Watlington Parish Council

Waverley Borough Council is a waste collection authority in Surrey and a member of the Surrey Environment Partnership (made up of the Borough's and Districts of Elmbridge, Epsom and Ewell, Guildford, Mole Valley, Reigate and Banstead, Runnymede, Spelthorne, Tandridge, Surrey Heath, Waverley, Woking and Surrey County Council).

Way to Eco Ltd

Wealden District Council

Wealden District Council

Welwyn Hatfield Council

Wessex Water

West Berkshire Council  
West Devon Borough Council  
West Dorset Friends of the Earth  
West London Waste Authority (WLWA)  
West Lothian Council  
West Sussex County Council - Waste Disposal Authority  
Western Riverside Waste Authority  
White Moss Horticulture  
WI  
Wigan Council  
Wildlife & Countryside Link  
Wiltshire Council  
WinACC Waste Action Group  
Wooden Inspirations  
Woodrow and Greenlands Community Orchard  
Worcester City Council  
Worcestershire County Council  
World wise foods  
Wychavon District Council  
WYG  
Wyre Council  
Wyre Forest District Council  
Yeo Valley Production